

# Independent Reporting Mechanism

Results Report:  
Croatia 2022-2024

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Open  
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Independent  
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## Executive Summary

**Croatia's fourth OGP action plan resulted in notable improvements to lobbying transparency and to fiscal transparency. Most commitments were completed, but less than half led to early results. The co-creation and implementation processes were generally participatory, but civil society stakeholders have expressed less enthusiasm for participating in the OGP process.**

### Early Results

Croatia's fourth action plan contained 16 commitments. It mostly built on the previous action plan, with commitments around increasing transparency of parliament, financial information, civil society funding, publicly owned companies, and official documents. Other topics were whistleblower protection open data, improving consultation processes, and stimulating open government at the local and regional levels. New themes dealt with protection of personal data, and improving the transparency of state asset management.

The IRM Action Plan Review identified two commitments as promising: Commitment 12 on anti-corruption and Commitment 8 on media regulatory framework.<sup>1</sup>

Commitment 12 resulted in the implementation of activities from the 2021-2030 Anti-Corruption Strategy, including the passage of the Lobbying Act, Croatia's first legal regulations on lobbying. Commitment 8 achieved moderate early results owing to a milestone on fighting disinformation but did not lead to the passage of legislative changes. This commitment has remained incomplete since the third action plan (2018-2020).<sup>2</sup> Commitment 3 saw moderate early results in fiscal transparency through the timely publication of public spending data in open formats. Nine commitments had no notable results. In general, the commitments were less ambitious with fewer early results than in previous action plans, where three commitments resulted in major changes in opening government.<sup>3</sup>

### Completion

Croatia fully completed 10 commitments and substantially completed two commitments. The commitments with limited implementation suffered delays in drafting relevant legislation, including the Referenda Act (Commitment 5) and the Media Act (Commitment 8), or in relevant IT infrastructure (Commitment 6). In general, implementation was more successful in this action plan compared to the previous plan, as many milestones in the previous cycle were not completed because of the COVID-19 pandemic. Commitments that involved education, training, or technical modifications of existing systems or public services were mostly completed. In including activities linked to EU-funded projects, strategic plans and other activities (mostly

## IMPLEMENTATION AT A GLANCE

### LEVEL OF COMPLETION

**12/16**

Complete or substantially complete commitments

### EARLY RESULTS

**7/16**

Commitments with early results

**1/16**

Commitments with significant results

### COMPLIANCE WITH MINIMUM

**Not acting according to OGP process.**

involving training and education), the government opted to reduce the ambition of commitments.<sup>4</sup>

## Participation and Co-Creation

The Croatian Council for the OGP Initiative (OGP Council), counting 26 members representing state, local, and regional authorities, civil society organizations (CSOs), academia, and the media, is Croatia's multistakeholder forum.<sup>5</sup> The Government Office for Non-Governmental Organizations provides administrative support to the Council, in cooperation with the Ministry of Foreign and European Affairs, whose Secretary of State chairs it. The government engaged civil society in iterative dialogue throughout the co-creation process and engaged the public twice via the e-consultation portal. CSOs had opportunities to voice their opinions on commitment implementation and provide recommendations at OGP Council sessions, even though the sessions were less frequent than the minimum requirements under OGP's standard (two per year).<sup>6</sup> Government representatives were open to dialogue and collaboration during implementation and monitoring of the action plan, where there was opportunity for non-governmental stakeholders to affect the outcomes. Despite consensual decision-making and the good will of each member of the OGP Council, government and CSO representatives felt less enthusiasm for participation than in previous action plan cycles. Civil society stakeholders believe this could be remedied by increasing the ambitiousness of commitments in the future.

## Implementation in context

Implementation of the action plan was not significantly disturbed by the super-election year in 2024 (including parliamentary, European parliamentary and presidential elections). Negative influences on implementation of the action plan included the tying up of key governmental resources and having priority over other endeavors. The most significant factor that supported implementation of the action plan was achieving Organisation for Economic Co-operation and Development (OECD) standards. Croatia's accession into the OECD remains the main political priority for the current government.<sup>7</sup>

<sup>1</sup> Open Government Partnership, IRM Action Plan Review: Croatia 2022-2024, [https://www.opengovpartnership.org/wp-content/uploads/2023/01/Croatia\\_Action-Plan-Review\\_2022-2024\\_EN\\_for-public-comment.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/01/Croatia_Action-Plan-Review_2022-2024_EN_for-public-comment.pdf)

<sup>2</sup> Open Government Partnership, IRM Transitional Results Report: Croatia 2018-2020, p 13, [https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia\\_Transitional-Results\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf)

<sup>3</sup> Open Government Partnership, IRM Transitional Results Report: Croatia 2018-2020, [https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia\\_Transitional-Results\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2021/06/Croatia_Transitional-Results_Report_2018-2020_EN.pdf)

<sup>4</sup> According to stakeholders interviewed for the 2022-2023 Action Plan Review, [https://www.opengovpartnership.org/wp-content/uploads/2023/02/Croatia\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/02/Croatia_Action-Plan-Review_2022-2024_EN.pdf)

<sup>5</sup> Open Government Partnership Council, Savjet inicijative Partnerstvo za otvorenu vlast, 23 September 2024, <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>; Croatia's End-of-Term Self-Assessment Draft Report, September 2024; and Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.

<sup>6</sup> OGP Council session details are found at Government Office for Cooperation with NGOs, Savjet inicijative Partnerstvo za otvorenu vlast [Open Government Partnership Council], 23 September 2024, <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

<sup>7</sup> OECD, 7 September 2024, <https://www.oecd.org/en.html>

## Table of Contents

Section I: Key Observations .....	1
Section II: Implementation and Early Results .....	3
Section III. Participation and Co-Creation .....	12
Section IV. Methodology and IRM Indicators .....	16
Annex I. Commitment Data.....	18

## Section I: Key Observations

### **Observation 1: Commitments derived from existing practices, plans and projects offered fewer opportunities for civil society to influence their implementation.**

The government took many commitments in the action plan directly from existing practices, policies, and projects. This resulted in a high level of completion of commitments, but it offered fewer opportunities for civil society to influence implementation. Also, many milestones focused on ongoing education, training, or workshops. The fifth action plan could focus on commitments that use non-governmental experts in implementation or build on the areas that stakeholders originally prioritized for the fourth plan but were not included, such as:

- introducing deliberation procedures in decision-making (citizen assemblies, public hearings, etc.);
- improving media freedom and transparency (introducing an independent media council, prohibiting secret ownership of media outlets, adopting new media legislation, addressing SLAPP lawsuits, etc.);
- revitalizing the framework to engage civil society (the Council for the Development of Civil Society, and a new national strategy);
- amending lobbying legislation by requiring public officials to disclose meetings with lobbyists;
- increasing financial literacy among citizens and civil servants;
- publishing working groups' composition when drafting legal and strategic acts;
- increasing judicial transparency and accountability (setting up a public database of all judicial decisions, strengthening the public prosecution office to combat corruption).

The OGP Resources Tool can help with shaping commitments in the next action plan.<sup>8</sup> Also, for higher levels of ambition, Croatia could link OGP commitments to relevant external efforts. One example is introducing citizen assemblies in the public consultation process, which some CSO stakeholders already have experience in.<sup>9</sup>

### **Observation 2: Collaboration with subnational governments led to notable achievements in opening government.**

The national government's collaboration with counties, cities, and municipalities in implementing open government reforms gained traction during this implementation period. This collaboration achieved notable successes, including the adoption of budget transparency among local units and the development of open data portals by cities like Rijeka and Zagreb. This trend is an improvement compared to previous action plans. Despite varying levels of implementation across local units, these efforts underscore the potential for subnational governments to drive meaningful advancements in openness, accountability, and citizen engagement. This national-local collaboration could be expanded during the fifth action plan.

### **Observation 3. Time and resource constraints have led civil society and government ministries to deprioritize the OGP process.**

Although the level of engagement among civil society stakeholders remained high during this action plan, stakeholders commented that they felt they were expending their resources on a process that lacked the full support of the government.<sup>10</sup> Besides the difficulty of committing to major reforms within a two-year timeframe, government representatives are constrained by the

need to follow legal procedures and limited human and financial resources. Nonetheless, civil society expressed appreciation for the good will of all government representatives involved in the OGP process to implement their commitments. At the same time, state representatives expressed dissatisfaction with CSO participation. For example, some organizations have repeatedly failed to participate in OGP Council meetings, failed to name new representatives after management changes, or have not participated in activities for which they were co-implementers.<sup>11</sup> There have been several changes in OGP Council membership since 2022, leading some CSOs to opt out of participating in it. The next action plan could benefit from enhanced communication and collaboration tools and regular updates to stakeholders, especially during implementation.

**Observation 4: Croatia's accession into the OECD is an opportunity to improve anti-corruption standards and evidence-based policy-making.**

Croatia became a candidate for accession to the Organisation for Economic Co-operation and Development (OECD).<sup>12</sup> Candidate countries must adhere to standards spanning a multitude of policy areas.<sup>13</sup> During the fourth action plan, Croatia fulfilled 49 out of 247 legal instruments for OECD membership.<sup>14</sup> Croatia's OECD candidate status affected several commitments in the fourth action plan. Croatia adopted OECD's Anti-Bribery Convention in January 2024.<sup>15</sup> It has also prepared for OECD standards of corporate governance by drafting the new Law on Legal Entities Owned by the Republic of Croatia (Commitment 7). The new legal framework provides clear financial and non-financial goals for the government to contribute to the professionalization of supervisory and management boards of over 900 enterprises.<sup>16</sup>

Croatia intends to achieve OECD membership by 2026. This could provide an opportunity for including ambitious commitments in the next action plan in line with OECD standards. Croatia could also commit to summarizing the OECD's recommendations in one easily accessible place (e.g. the government website), as civil society stakeholders have remarked on having to sift through various sources to track the accession process.<sup>17</sup>

<sup>8</sup> Open Government Partnership, The OGP Resources Tool, 8 September 2024, <https://www.opengovpartnership.org/resources/>

<sup>9</sup> Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024; Melisa Skender (HND), interview by the IRM, 13 September 2024; and Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024. Ms Ivković Novokmet in particular participated in OGP Local's education program in Brussels recently, focusing on citizen participation in particular.

<sup>10</sup> Ott and Bronić (Institute of Public Finance), correspondence with the IRM, 13 November 2020; Berković and Skender (GONG), interview by the IRM, 13 November 2020.

<sup>11</sup> Darija Marić (Government Office for Cooperation with Non-Governmental Organizations), interview by the IRM, 9 November 2020.

<sup>12</sup> OECD, Accession Croatia, 7 September 2024, <https://www.oecd.org/en/countries/croatia.html>

<sup>13</sup> OECD Legal instruments, 7 September 2024, <https://legalinstruments.oecd.org/en/about>

<sup>14</sup> Tportal, Hrvatska ispunila tek petinu kriterija OECD-a, Grlić Radman tvrdi drugačije, 3 January 2024, <https://www.tportal.hr/biznis/clanak/hrvatska-ispunila-tek-petinu-kriterija-oecd-a-grlica-radmana-to-ne-brine-foto-20240103>

<sup>15</sup> OECD Legal Instruments, Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 2024, <https://legalinstruments.oecd.org/public/doc/205/205.en.pdf>

<sup>16</sup> E-Savjetovanja, This includes the proposal for the Law on Legal Entities Owned by the Republic of Croatia and the proposal for the Law on the Center for Restructuring and Sale (CERP), which were submitted for public consultation on 20 December 2024, <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=29413> and <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=29415>. Croatia has a majority ownership of more than 900 companies, with 800 under the jurisdiction of counties, cities, and municipalities, 10 in the CERP portfolio, with an additional 36 companies of special interest, which are the focus of these reform interventions.

<sup>17</sup> Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

## Section II: Implementation and Early Results

The following section looks at the two commitments or clusters that the IRM identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments or clusters identified as promising in the Action Plan Review as a starting point. After verification of completion evidence, the IRM also took into account commitments or clusters that were not determined as promising but that, as implemented, yielded predominantly positive or significant results.

### **Commitment 3: Fiscal Transparency** (Ministry of Finance)

#### **Context and Objectives:**

Under this commitment, the Ministry of Finance aimed to regularly publish accurate information on fiscal data and make this data available for download.<sup>18</sup> The milestones included increasing the visibility and use of the database on payments made from the single State Budget Account; publishing the State Budget proposal with explanations in open format (Excel and Word) in a timely manner; promoting transparent publishing of budget data; publishing a monthly series of revenues and expenditures of the State Budget according to the national methodology, publishing quarterly reports on revenues and expenditures of extra-budgetary beneficiaries and quarterly data for general government according to the new Government Finance Statistics (GFS) 2014 methodology; and publishing information on the spending of local and regional self-government units, budgetary, and extra-budgetary beneficiaries. It built on commitments from Croatia's first three action plans.

#### **Early Results: Moderate Results**

The commitment achieved moderate early results. However, due to the importance of opening data about public (national, subnational, budgetary, and extra-budgetary beneficiaries) budgeting and spending for transparency and accountability, these results are meaningful. Stakeholders commended the Ministry of Finance's efforts to publish public spending data in a timely manner, using open formats.<sup>19</sup> The commitment built on previous action plans by increasing the scope of budgetary data (including the type of data, its searchability, and frequency of publication) and the breadth of public institutions included in data opening in each iteration (national government, state budgetary and extra-budgetary beneficiaries, and regional and local budgets). The commitment was also the best example in Croatia's fourth action plan of collaboration between government and non-government stakeholders – the Institute for Public Finance and the Ministry of Finance, the Croatian Union of Counties, and the Association of Cities and the Croatian Union of Municipalities – to improve existing practices and policies.<sup>20</sup> Increasing fiscal transparency allows citizens to participate more easily in budget processes, resulting in more efficient public services. Since Croatian citizens have historically had low levels of participation in budgetary processes, evidence is still sporadic and more easily found at local levels,<sup>21</sup> but opening data is a step in the right direction.<sup>22</sup>

The first milestone was fully completed. The Ministry of Finance launched a new web application, replacing the "Inquiry by suppliers" application based on the Ministry of Finance's 2023 official instructions on publishing data.<sup>23</sup> The new application provides more options for searching state payments and configuring data.<sup>24</sup> Users can search data on state payments by recipients (legal entities, natural persons, and recipients of funds outside of Croatia), by the



payer (budgetary and extrabudgetary user who gave the payment order), and by type of expense. The application allows combining search parameters and exporting data in a machine-readable form. Classified data is not published. Data on payouts are updated every working day and can be searched by year or by month.<sup>25</sup> Entities that do not make payments from the state budget account are required to publish their data on their websites. According to experts, the application is an improvement on the previous one and led to positive results in fiscal transparency. While searchability is possible only from its launch (early 2024), an archive is available in the "Inquiry by suppliers" app for older data.<sup>26</sup>

For the second milestone, the Ministry of Finance now publishes the state budget proposal in Excel on its website.<sup>27</sup> The government published its budget in PDF,<sup>28</sup> while the parliament published it in both formats after adoption.<sup>29</sup> This milestone was almost fully completed, as the government did not include the Excel format of the draft budget on its website.

For the third milestone, data on payments and disbursements from the budget of all counties, 91 cities (out of 127) and 126 municipalities (out of 428) were published on the Open Counties website in a timely manner (in line with legal requirements) and in machine-readable formats.<sup>30</sup> There are minor issues with the data on the website, according to experts.<sup>31</sup> The Instruction obligates counties to publish data on spending. According to the data of the Institute for Public Finance (November 2022 – April 2023), all counties have published on their websites their reports on the annual execution of the budget for 2021, reports on the half-year execution of the budget for 2022, budget proposal for 2023, voted budget for 2023, and budget guide for citizens for 2023.<sup>32</sup> This milestone was substantially implemented.

For the fourth milestone, data on the monthly series of revenues and expenditures of the state budget according to the national methodology of the calculation plan are published up to March 2024;<sup>33</sup> reports on income and expenditure, and receipts and expenditure of non-budgetary users of the state budget are published quarterly<sup>34</sup>; for the general government, according to the new GFS 2014 methodology, data until 2022<sup>35</sup> are published.<sup>36</sup> This milestone was fully completed.

For the fifth milestone, data on payments by local and regional self-government units, budgetary and extra-budgetary entities are now available on the Ministry of Finance's new web application.<sup>37</sup> Article 144 of the Budget Act<sup>38</sup> obliges local and regional units to publish information on spending on their websites in an easily accessible, searchable, and machine-readable manner. As the application does not yet include data from all envisaged entities, the milestone was substantially completed.

This commitment has improved budget transparency in Croatia. Data of this sort were available prior to this commitment, but were often incomplete, inaccurate, and not published on time. Work still must be done on making these documents more understandable to citizens, although the government and most local and regional governments now publish citizen budgets.<sup>39</sup> While late in adopting its instruction on publication,<sup>40</sup> the Ministry of Finance introduced a precise guideline on fiscal transparency across the public sector. Citizens can now expect that the government, their city, and county or other public entity will publish all relevant budgetary information in a timely manner and in open formats, as there are sanctions for not fulfilling this requirement.<sup>41</sup> The Institute for Public Finance has conducted several research cycles on the budget transparency of all Croatian counties, cities, and municipalities. The average budget



transparency of all local units, expressed by the number of key budget documents published on their websites, is 4.6 (max possible is 5). Nineteen counties published all five, cities published an average of 4.83, and municipalities an average of 4.55 documents. Compared to the first research cycle in 2015, budget transparency increased from 1.8 to 4.6 in 2023. Changes are noticeable in all types of units for all documents, which is shown by the publication of the budget for citizens – increasing from only 1 percent to 84 percent in that period.<sup>42</sup>

### **Looking Ahead:**

The government intends to continue this commitment in the next action plan, though it is unclear what that will entail.<sup>43</sup> Civil society stakeholders<sup>44</sup> recommend encouraging greater participation of citizens, media, trade unions, politicians, and scientists.<sup>45</sup> The cities of Rijeka<sup>46</sup> and Zagreb offer good examples of such participation.<sup>47</sup> The government could also create engaging analyses and visualizations, enlisting the help of experts to help citizens understand complex budgetary documents, and enhancing financial literacy for both public employees and citizens. The IRM recommends any future commitment on fiscal transparency contain links to each item, to help citizens find information and determine whether something has been implemented or not.

### **Commitment 12: Improving Anti-Corruption Legislation** (Ministry of Justice, Public Administration and Digital Transformation)

#### **Context and Objectives:**

This commitment aimed to adopt and implement an action plan for the period 2022-2024 of Croatia's Anti-Corruption Strategy 2021-2030.<sup>48</sup> It also sought to introduce Croatia's first legal regulations around lobbying activities. A comparative analysis<sup>49</sup> produced during Croatia's 2014-2016 action plan informed the decision to draft a new law dedicated to lobbying.<sup>50</sup> The professional lobbying sector in Croatia is small but direct contacts between representatives of businesses and members of the government are common. The Group of States against Corruption (GRECO) reported in 2020 a lack of transparency of the interests and people influencing policies and government decisions.<sup>51</sup> Prompted by the GRECO report as well as the analysis,<sup>52</sup> stakeholder opinions during the co-creation process,<sup>53</sup> and IRM recommendations,<sup>54</sup> the Ministry of Justice and Public Administration decided to regulate lobbying.<sup>55</sup>

#### **Early Results: Significant Results**

The 2022-2024 action plan for the Anti-Corruption Strategy 2021-2030 was adopted immediately after Croatia submitted its OGP action plan.<sup>56</sup> It has measures and activities to implement the five goals of the Strategy to strengthen the institutional and normative anti-corruption framework, the transparency and openness of public authorities, the system of integrity and conflict of interest management, anti-corruption in public procurement, and public awareness.<sup>57</sup> This was Croatia's first anti-corruption strategy within the strategic planning regulatory framework, with clear indicators and milestones.<sup>58</sup> The regulatory framework has strict rules on monitoring, reporting, and evaluating progress, with bodies responsible for monitoring implementation of the Strategy and the action plan – one linked to the executive (Council for the Prevention of Corruption<sup>59</sup>), and the other to the legislative (National council for monitoring the implementation of the Anti-Corruption Strategy<sup>60</sup>). The envisaged activities were mostly being carried out according to plan.<sup>61</sup> Of the 42 activities for 2022, 69 percent were fully completed, and 19 percent were partially completed. In 2023, the percentages were similar – 60 percent of 43 activities fully implemented, and 19 percent partially completed. Civil society

participated in monitoring the implementation of the commitment, primarily through the work of the Council for the Prevention of Corruption.

One major activity was the publication of data from the Register of Beneficial Owners in open format from 30 September 2022.<sup>62</sup> GONG (a citizens' association) noted several deficiencies in the Register.<sup>63</sup> According to GONG, the Register does not include "secret members," wherein a secret society is created by a contract in which one person (secret member) invests property in the company of another person (entrepreneur) and gains the right to participate in the entrepreneur's profits and losses. The Prevention of Money Laundering and Financing of Terrorism Act does not mention secret societies or secret members, so legal entities are not obliged to enter information about a secret member in the Register of Beneficial Owners. That is, it should be stated in the Register of Beneficial Owners that a company has a secret owner if they own a controlling share, but their identity does not have to be stated if they own less and only participate in profit/loss and do not control the business. Several corruption cases in Croatia show that the total share in company ownership has no impact on underhanded dealings. GONG also notes that the data can only be accessed through the e-Citizen system (using the NIAS identification standards). This means that anyone searching for owners can be traced back by administration, and those citizens who, for whatever reason, do not have a NIAS credential, cannot access the Register.

Other prominent completed activities in 2022 and 2023 included the adoption of guidelines for the code of ethics at the local and regional level (for members of representative bodies),<sup>64</sup> amendments to the Law on the Government of the Republic of Croatia to restrict immunity for members of the government with regard to criminal offences in corruption,<sup>65</sup> a Code of Ethics for members of the State Commission for Control of Public Procurement Procedures and civil servants,<sup>66</sup> the Code of Conduct for Members of the Croatian Parliament,<sup>67</sup> and guidelines on the ethics and integrity of officials at the local level.<sup>68</sup> The Anti-Corruption Strategy is linked to the EU's structural and investment funds, and the National Recovery and Resilience Plan 2021-2026.<sup>69</sup> This means that the absorption of EU funds is directly linked to some of these achievements and there is strong indication that they will be continued in the future. It would have been useful if this commitment had been organized around specific activities from the Anti-Corruption Strategy's action plan, as with adopting the lobbying legislation.

The drafting of the Lobbying Act was also included in the Anti-Corruption Strategy's action plan.<sup>70</sup> Civil society have called for regulation of lobbying for many years.<sup>71</sup> Without clearly defined standards of behavior between lobbyists and government officials, professional lobbying has potential for corruption. Parliament adopted the Lobbying Act on 14 March 2024, and it entered into force on 1 October 2024.<sup>72</sup> The drafting was delayed by one year from the expected deadline (April 2023 to April 2024). The Act establishes for the first time lobbying activities as a transparent, legal, and legitimate profession with the possibility of monitoring and supervision.<sup>73</sup> The Act defines lobbying activities, the principles of lobbying, who is considered a lobbyist, the obligations of lobbyists and of persons being lobbied, the principles of communication with a lobbyist, reporting on lobbying activities, and details on the lobbyist register. The Act also prescribes the digitization of registration and removing a company from the register, and the possibility of public access to data from the future Register of Lobbyists – to be published in an open format, as well as informing citizens about the drafted normative framework. Professional lobbyists will also be held to legal and ethical standards and sanctioned for infractions.

Stakeholders warned that the Lobbying Act contains several important omissions.<sup>74</sup> For example, the Act does not oblige lobbyists to submit detailed reports on when and with whom they lobbied in real time, only once a year. It also does not mention whether these annual reports will be accessible to the public and does not make the persons being lobbied responsible for reporting anything. According to civil society, it is not enough to know who the lobbyists are, but also with whom, when, and exactly what they had meetings about. This disparity between lobbyists and lobbied officials is detrimental for two reasons. First, it ignores the experiences of some EU member states where lobbying laws also placed the burden of reporting solely on lobbyists.<sup>75</sup> Members of the European Parliament, the Council of the EU, and the European Commission are now obliged to report meetings with lobbyists from their side. Second, the government had enough time to recognize this pitfall and avoid it in the proposed legislation, as it was adopted five years after GRECO's report on Croatia from 2019,<sup>76</sup> and two years after the European Commission's report on the rule of law in Croatia from 2022,<sup>77</sup> which warned of the need for legal regulation of lobbying.<sup>78</sup>

As the Lobbying Act entered into force after the action plan period, and the Registry of Lobbyists is not yet operational, its practical results remain to be seen.<sup>79</sup> However, the Act explicitly requires the creation of the Register of Lobbyists, which is expected to provide public access to information on lobbying activities. It is also Croatia's first legal regulation of the lobbying sector. Therefore, the IRM considers the early results of this commitment to be significant, despite shortcomings in the Lobbying Act.

### Looking Ahead:

The activities implemented in the Anti-Corruption Strategy and the regulation of lobbying strengthen Croatia's anti-corruption environment and transparency. As the government begins to implement the Lobbying Act, it could consult reforms from Chile,<sup>80</sup> Latvia,<sup>81</sup> and Finland<sup>82</sup> on leveraging the OGP process to support lobbying reform, especially using open calendars and open data as monitoring mechanisms. As of October 2024, the Ministry of Judiciary, Public Administration and Digital Transformation, along with other ministries, is setting up an IT platform for the anti-corruption framework, containing six modules, one of which is the Register of Lobbyists.<sup>83</sup> The test phase was due to begin at the end of 2024 and the full operation is planned for mid-2025.<sup>84</sup> Access will be possible using the e-Citizen (NIAS) system. Also, the Ministry is conducting an information campaign on the issue and has prepared a guide on the lobbying legislation.<sup>85</sup> Likewise, the bylaw regulating the Register of Lobbyists is being prepared by the Commission for Resolution of Conflicts of Interest.<sup>86</sup>

The IRM recommends the government closely monitor the Lobbying Act and consider registering lobbying activities in real time, in addition to the annual report by the lobbyists. This would allow the Commission for Resolution of Conflicts of Interest to intervene in time if infractions are found. Also, the government could publish the annual reports automatically as part of the Register of Lobbyists (linked to the name of the lobbyist/lobbying company) and enable comparison with the reports on meetings held by public officials and representatives to achieve public accountability and transparency.

<sup>18</sup> Republic of Croatia, Action Plan for the Implementation of the Open Government Partnership Initiative in the Republic of Croatia for the period 2022-2023, [https://www.opengovpartnership.org/wp-content/uploads/2022/07/Croatia\\_Action-Plan\\_2022-2024\\_June\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/07/Croatia_Action-Plan_2022-2024_June_EN.pdf)

<sup>19</sup> Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024; Melisa Skender (HND), interview by the IRM, 13 September 2024.

<sup>20</sup> Institute for Public Finance, Provedba Akcijskog plana inicijative Partnerstvo za otvorenu vlast u Hrvatskoj: fiskalna transparentnost, 22 December 2023, <https://www.ijf.hr/hr/novosti/detalji/provedba-akcijskog-plana-inicijative-partnerstvo-za-otvorenu-vlast-u-hrvatskoj,3546.html>

<sup>21</sup> An analysis for the 2015-2020 period showed that local units with lower administrative capacity also had lower budget transparency, and vice versa. Although significant, fiscal capacity is not decisive, and even local units with lower fiscal capacity can achieve higher levels of transparency and participation. The results indicate the importance of administrative (but also fiscal) capacity for achieving higher levels of transparency, which could contribute to greater accountability of governments and better opportunities for public participation in local budget processes.

Bronić, M., Stanić, B. And Opačak, M., Fiskalni i administrativni kapacitet i proračunska transparentnost općina i gradova u Republici Hrvatskoj, Hanns-Seidel-Stiftung / Ekonomski institut Zagreb, 2022,

[https://www.eizg.hr/userdocsimages/publikacije/zbornik\\_prilika\\_ili\\_prijetnja.pdf](https://www.eizg.hr/userdocsimages/publikacije/zbornik_prilika_ili_prijetnja.pdf)

<sup>22</sup> The Ministry of Finance has been using a form for citizen participation in budget development, available online, for years. However, no information is available to ascertain if any comments were received nor how they were responded to, Participation of citizens in the process of planning the state budget, Ministry of Finance, 2024,

<https://mpudt.gov.hr/pristup-informacijama-6341/financijski-dokumenti-ministarstva-pravosudja-i-uprave/sudjelovanje-gradjana-u-procesu-planiranja-drzavnog-proracuna/24804?lang=en>

<sup>23</sup> Ministry of Finance, Naputak o okvirnom sadržaju, minimalnom skupu podataka te načinu javne objave informacija o trošenju sredstava na mrežnim stranicama jedinica lokalne i područne (regionalne) samouprave te proračunskih i izvanproračunskih korisnika državnog proračuna i jedinica lokalne i područne (regionalne) samouprave (Official Gazette, 59 /2023),

[https://narodne-novine.nn.hr/clanci/sluzbeni/2023\\_06\\_59\\_1003.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2023_06_59_1003.html)

<sup>24</sup> Ministry of Finance, Transparentnost državnog proračuna – nova aplikacija za pregled isplata, 20 February 2024,

<https://mfin.gov.hr/vijesti/transparentnost-drzavnog-proracuna-nova-aplikacija-za-pregled-isplata/3606>

<sup>25</sup> Annually, more than 1,350,000 transactions are carried out through the single account of the state budget, and the number of suppliers in the system of the single account of the state budget is greater than 230,000. 115 budget users of the state budget operate through the single account of the state budget, and around 98 percent of total revenues and receipts, i.e. expenditures and expenditures of the budget and budget users, are realized. Ministry of Finance, Transparentnost državnog proračuna – nova aplikacija za pregled isplata, 20 February 2024, <https://mfin.gov.hr/vijesti/transparentnost-drzavnog-proracuna-nova-aplikacija-za-pregled-isplata/3606>. This was confirmed by Mihaela Bronić (Institute for Public Finance), interview by the IRM, 3 October 2024.

<sup>26</sup> Ministry of Finance, Izvršenje po dobavljačima – arhiva, 11 October 2024, <https://mfin.gov.hr/istaknute-teme/drzavna-riznica/izvršenje-po-dobavljacima-arhiva/3248>

<sup>27</sup> [https://mfin.gov.hr/UserDocsImages/dokumenti/Informacije\\_za\\_gradane/NPZ%20DP%20RH%20za%202024-25-26.zip](https://mfin.gov.hr/UserDocsImages/dokumenti/Informacije_za_gradane/NPZ%20DP%20RH%20za%202024-25-26.zip)

<sup>28</sup> Government of the Republic of Croatia, 9 November 2023, <https://vlada.gov.hr/sjednice/262-sjednica-vlade-republike-hrvatske-39338/39338>

<sup>29</sup> <https://www.sabor.hr/hr/sjednice-sabora/prijedlog-drzavnog-proracuna-republike-hrvatske-za-2024-godinu-i-projekcija-za-2025?t=142291&tid=212269> and

<https://www.sabor.hr/sites/default/files/uploads/sabor/2023-11-09/202211/1.%20DPRH%20za%202024.zip> (Excel)

<sup>30</sup> The Croatian Union of Counties, a national association of all counties (20) and the City of Zagreb, continuously implements the Open Budget | Open Counties project, through which budget data is available for all counties and the City of Zagreb, with two main goals: through a simple application, in a unified way, to enable citizens and all interested participants to visualize county budgets by all budget classifications and the most important indicators of development (entrepreneurship, tourism, demography), as well as to provide county administrations with a detailed analysis and comparison of local and regional budgets, the most important economic, tourist, and demographic indicators. See <https://www.opencity.hr/hrvzz/>

<sup>31</sup> Mihaela Bronić (Institute for Public Finance), interview by the IRM, 3 October 2024. The issues are: when the first page of the application is opened (<https://www.opencity.hr/hrvzz/>), it is not clear to which year the data refer; when entering the part of the application that refers to the analysis (left menu) where it is possible to download documents, not every local/regional unit posted budget proposals and rebalancing in all formats (Excel, PDF); it is not immediately clear whether the downloadable documents in the left menu on annual data in a machine-readable format refer to the voted budget or budget execution.

<sup>32</sup> Institute of Public Finance, Local budget transparency, November 2022 – April 2023, <https://www.ijf.hr/en/transparency-2023/>. The average budget transparency of all Croatian counties is 5 (out of 5).

<sup>33</sup> <https://mfin.gov.hr/print.aspx?id=98&url=print>

[https://mfin.gov.hr/UserDocsImages/dokumenti/statistika\\_i\\_izvjesca/vremenske\\_serije\\_podataka/Najzna%C4%8Dajnije%20kat%20gorije%20prihoda%20dr%C5%BEavnog%20prora%C4%8Duna%20prema%20ra%C4%8Dunskom%20planu%20do%20studenti%202024.xlsx](https://mfin.gov.hr/UserDocsImages/dokumenti/statistika_i_izvjesca/vremenske_serije_podataka/Najzna%C4%8Dajnije%20kat%20gorije%20prihoda%20dr%C5%BEavnog%20prora%C4%8Duna%20prema%20ra%C4%8Dunskom%20planu%20do%20studenti%202024.xlsx)

[https://mfin.gov.hr/UserDocsImages/dokumenti/statistika\\_i\\_izvjesca/vremenske\\_serije\\_podataka/Najzna%C4%8Dajnije%20kategorije%20rashoda%20dr%C5%BEavnog%20prora%C4%8Duna%20prema%20ra%C4%8Dunskom%20planu%20do%20studenog%202024.xls](https://mfin.gov.hr/UserDocsImages/dokumenti/statistika_i_izvjesca/vremenske_serije_podataka/Najzna%C4%8Dajnije%20kategorije%20rashoda%20dr%C5%BEavnog%20prora%C4%8Duna%20prema%20ra%C4%8Dunskom%20planu%20do%20studenog%202024.xls)

<sup>34</sup> Ministry of Finance, Time series of data, <https://mfin.gov.hr/pristup-informacijama/statistika-i-izvjesca/vremenske-serije-podataka/98>

<sup>35</sup> Ministry of Finance, Time series of data, <https://mfin.gov.hr/pristup-informacijama/statistika-i-izvjesca/vremenske-serije-podataka/98>

<sup>36</sup> Mihaela Bronić (Institute for Public Finance), interview by the IRM, 3 October 2024.

<sup>37</sup> Ministry of Finance, Transparentnost državnog proračuna – nova aplikacija za pregled isplata, 20 February 2024, <https://mfin.gov.hr/vijesti/transparentnost-drzavnog-proracuna-nova-aplikacija-za-pregled-isplata/3606>

<sup>38</sup> Parliament of Croatia, Budget Act (Official Gazette, 144/2021), [https://narodne-novine.nn.hr/clanci/sluzbeni/full/2021\\_12\\_144\\_2457.html](https://narodne-novine.nn.hr/clanci/sluzbeni/full/2021_12_144_2457.html)

<sup>39</sup> See <https://www.opencity.hr/hrvzz/>

<sup>40</sup> The instruction was to be adopted by 30 June 2022, according to Croatia's action plan.

<sup>41</sup> Parliament of Croatia, Article 156 of the Budget Act (Official Gazette, 144/2021), [https://narodne-novine.nn.hr/clanci/sluzbeni/full/2021\\_12\\_144\\_2457.html](https://narodne-novine.nn.hr/clanci/sluzbeni/full/2021_12_144_2457.html)

<sup>42</sup> Lider, Institut za javne financije: Proračunska transparentnost jedinica lokalne samouprave na rekordnoj razini, 5 July 2023, <https://lidermedia.hr/financije/institut-za-javne-financije-proracunska-transparentnost-jedinica-lokalne-samouprave-na-rekordnoj-razini-151845>; Institute of Public Finance, Local budget transparency, November 2022 – April 2023, <https://www.ijf.hr/en/transparency-2023/>

<sup>43</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024; Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.

<sup>44</sup> Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024; Melisa Skender (HND), interview by the IRM, 13 September 2024; and Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024. Mihaela Bronić (Institute for Public Finance), interview by the IRM, 3 October 2024.

<sup>45</sup> Institute for Public Finance, Provedba Akcijskog plana inicijative Partnerstvo za otvorenu vlast u Hrvatskoj: fiskalna transparentnost, 22 December 2023, <https://www.ijf.hr/hr/novosti/detalji/provedba-akcijskog-plana-inicijative-partnerstvo-za-otvorenu-vlast-u-hrvatskoj.3546.html>

<sup>46</sup> Grad Rijeka, Participativno budžetiranje, 19 December 2024, <https://www.rijeka.hr/teme-za-gradane/aktivno-gradanstvo/participativno-budzetiranje-ukljucivanje-gradana-odlucivanje-proracunu/>

<sup>47</sup> Grad Zagreb, e-Participativno budžetiranje, 19 December 2024, <https://eparticipativno.zagreb.hr/>

<sup>48</sup> Parliament of Croatia, 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](https://narodne-novine.nn.hr/clanci/sluzbeni/2021_11_120_2069.html)

<sup>49</sup> Republic of Croatia, Analiza za uređenje zakonskog okvira lobiranja, December 2016, [https://mpu.gov.hr/UserDocsImages/dokumenti/Antikorupcija/dokumenti/Analiza%20za%20ure%C4%91enje%20zakonskog%20okvira%20lobiranja\\_za%20web%20final\\_clean.docx](https://mpu.gov.hr/UserDocsImages/dokumenti/Antikorupcija/dokumenti/Analiza%20za%20ure%C4%91enje%20zakonskog%20okvira%20lobiranja_za%20web%20final_clean.docx)

<sup>50</sup> 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, Commitment 13, [https://www.opengovpartnership.org/wp-content/uploads/2019/06/Croatia-OGP-Action-plan\\_0.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/06/Croatia-OGP-Action-plan_0.pdf)

<sup>51</sup> GRECO, Fifth Evaluation Round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies, 24 March 2020, <https://rm.coe.int/fifth-round-evaluation-report-on-croatia-preventing-corruption-and-pro/16809cff22>; GRECO, Compliance Report, 22 December 2021, <https://rm.coe.int/fifth-evaluation-round-compliance-report-on-croatia-adopted-by-greco-a/1680a4f0f6>

<sup>52</sup> Ivan Odeljan (Ministry of Judiciary and Administration), interview by the IRM, 12 October 2022.

<sup>53</sup> The lobbying community, relevant experts, CSOs, and other stakeholders in Croatia have been 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.

<sup>54</sup> Open Government Partnership, General Recommendations, IRM Croatia Design Report 2018-2020, [https://www.opengovpartnership.org/wp-content/uploads/2019/12/Croatia\\_Design\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/12/Croatia_Design_Report_2018-2020_EN.pdf)

<sup>55</sup> Open Government Partnership, Action Plan for the Implementation of the Open Government Partnership Initiative in the Republic of Croatia for the period 2022-2023, Commitment 12, <https://www.opengovpartnership.org/documents/croatia-action-plan-2022-2024/>

<sup>56</sup> Ministry of Judiciary and Administration, Akcijski plan za razdoblje od 2022. do 2024. godine uz Strategiju sprječavanja korupcije za razdoblje od 2021. do 2030. godine, July 2022, <https://mpu.gov.hr/UserDocsImages/dokumenti/Antikorupcija/dokumenti/Akcijski%20planovi%20-%20Strategija%202022-2030/Akcijski%20plan%20-%202022-2024.pdf>



<sup>57</sup> Parliament of Croatia, 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](https://narodne-novine.nn.hr/clanci/sluzbeni/2021_11_120_2069.html)

<sup>58</sup> In line with the Law on the Strategic Planning and Development Management System (OG 123/2017), [https://narodne-novine.nn.hr/clanci/sluzbeni/2017\\_12\\_123\\_2798.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2017_12_123_2798.html) and its by-laws.

<sup>59</sup> The Council for the Prevention of Corruption is a working body of the Government of the Republic of Croatia 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](https://narodne-novine.nn.hr/clanci/sluzbeni/2017_04_31_697.html)

<sup>60</sup> The parliamentary body was established in 2006 (Parliament of Croatia, 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, monitors the data on the occurrences of corruption that are submitted at request by 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.

<sup>61</sup> Republic of Croatia, Izvješće o provedbi Akcijskog plana za razdoblje od 2022. do 2024. godine uz Strategiju sprječavanja korupcije za razdoblje od 2021. do 2030. godine, za 2022., <https://mpudt.gov.hr/UserDocsImages/dokumenti/Antikorupcija/Izvjescje%20o%20provedbi%20Akcijskog%20plana%20za%202022..pdf>; Republic of Croatia, Izvješće o provedbi Akcijskog plana za razdoblje od 2022. do 2024. godine uz Strategiju sprječavanja korupcije za razdoblje od 2021. do 2030. godine, za 2022., <https://mpudt.gov.hr/UserDocsImages/dokumenti/Antikorupcija/Izvjescje%20o%20provedbi%20Akcijskog%20plana%20za%202022..pdf>; Republic of Croatia, Izvješće o provedbi Akcijskog plana za razdoblje od 2022. do 2024. godine uz Strategiju sprječavanja korupcije za razdoblje od 2021. do 2030. godine, za 2022., <https://mpudt.gov.hr/UserDocsImages/dokumenti/Antikorupcija/Izvjescje%20o%20provedbi%20Akcijskog%20plana%20za%202022..pdf>

<sup>62</sup> Register of Beneficial Owners (gov.hr), <https://gov.hr/hr/registar-stvarnih-vlasnika/2170?lang=en>

<sup>63</sup> GONG, Tajna društva unatoč Registru stvarnih vlasnika, 19 November 2021, <https://gong.hr//2021/11/19/tajna-drustva-unatoc-registru-stvarnih-vlasnika/>; GONG, Ministarstvo financija zapravo vodi Registar nestvarnog vlasništva, 23 November 2021, <https://gong.hr/2021/11/23/ministarstvo-financija-zapravo-vodi-registar-nestvarnog-vlasnistva/>; GONG, Gongove preporuke za suzbijanje pranja novca, 21 January 2022, <https://gong.hr/2022/01/21/gongove-preporuke-za-suzbijanje-pranja-novca/>; GONG, Europska komisija mora se zauzeti za korporativnu transparentnost kroz novu direktivu protiv pranja novca, 8 May 2023, <https://gong.hr/2023/05/08/europska-komisija-mora-se-zauzeti-za-korporativnu-transparentnost-kroz-novu-direktivu-protiv-pranja-novca/>; Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>64</sup> Republic of Croatia, Smjernice za izradu Kodeksa ponašanja članova predstavničkih tijela JLP(R)S, <https://mpu.gov.hr/istaknute-teme/borba-protiv-korupcije/dokumenti21699/21699>

<sup>65</sup> Parliament of Croatia, Zakon o izmjenama i dopunama Zakona o Vladi Republike Hrvatske, (Official Gazette, 80/2022), [https://narodne-novine.nn.hr/clanci/sluzbeni/2022\\_07\\_80\\_1168.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2022_07_80_1168.html)

<sup>66</sup> DKOM Code of ethics, Etički kodeks, 24 May 2022, <https://www.dkom.hr/eticki-kodeks-dkom-a/33188>

<sup>67</sup> Parliament of Croatia, Kodeks o etičkom djelovanju zastupnika u Hrvatskom saboru, (Official Gazette, 140/2022), [https://narodne-novine.nn.hr/clanci/sluzbeni/2022\\_12\\_140\\_2113.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2022_12_140_2113.html)

<sup>68</sup> Smjernice i upute vezane za etiku i integritet dužnosnika na lokalnoj razini, (Commission for Resolution of Conflicts of Interest), <https://www.sukobinteresa.hr/hr/smjernice-upute/smjernica-uputa-vezana-za-integritet-etiku-duznosnika-na-lokalnoj-razini-mjernica-i-uputa-vezana-za-integritet-i-etiku-duznosnika-na-lokalnoj-razini.pdf>

<sup>69</sup> European Commission, National Recovery and Resilience Plan of the Republic of Croatia from 2021 to 2026, 6 October 2022, [https://ec.europa.eu/info/files/recovery-and-resilience-plan-croatia\\_en](https://ec.europa.eu/info/files/recovery-and-resilience-plan-croatia_en)

<sup>70</sup> Open Government Partnership, IRM Action Plan Review: Croatia 2022-2024, p 8, [https://www.opengovpartnership.org/wp-content/uploads/2023/01/Croatia\\_Action-Plan-Review\\_2022-2024\\_EN\\_for-public-comment.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/01/Croatia_Action-Plan-Review_2022-2024_EN_for-public-comment.pdf)

<sup>71</sup> Open Government Partnership, IRM Croatia 2014-2016 End-of-term Report, [https://www.opengovpartnership.org/wp-content/uploads/2019/07/Croatia\\_EOTR\\_2014-2016\\_for-pub-comment\\_ENG.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/07/Croatia_EOTR_2014-2016_for-pub-comment_ENG.pdf)

<sup>72</sup> Parliament of Croatia, Zakon o lobiranju, (Official Gazette, 36/2024), [https://narodne-novine.nn.hr/clanci/sluzbeni/2024\\_03\\_36\\_567.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2024_03_36_567.html)

<sup>73</sup> Parliament of Croatia, Zakon o lobiranju, (Official Gazette, 36/2024), [https://narodne-novine.nn.hr/clanci/sluzbeni/2024\\_03\\_36\\_567.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2024_03_36_567.html)

<sup>74</sup> Faktograf.hr, Zakon o lobiranju – strog prema lobistima, blag prema političarima, 13 November 2023, <https://faktograf.hr/2023/11/13/zakon-o-lobiranju-strog-prema-lobistima-blag-prema-politicarima/>; GONG, Novi zakon: Regulira se lobiranje, ali svejedno nećemo znati tko, kada točno i koga lobira, 1 February 2024,

<https://gong.hr/2024/02/01/novi-zakon-regulira-se-lobiranje-ali-svejedno-necemo-znati-ko-kada-tocno-i-koga-lobira/>;

Balkans.aljazeera.net, Novi hrvatski Zakon o lobiranju uvodi red u sivu zonu, 8 October 2024,

<https://balkans.aljazeera.net/teme/2024/10/8/novi-hrvatski-zakon-o-lobiranju-uvodi-red-u-sivu-zonu>. Melisa Skender (HND), interview by the IRM, 13 September 2024, and Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>75</sup> The Ministry of Justice and Administration rejected this proposal, stating that the Code of Conduct for State Officials in Executive Power Bodies (Kodeks ponašanja državnih dužnosnika u tijelima izvršne vlasti (Official Gazette, 54/2022)), [https://narodne-novine.nn.hr/clanci/sluzbeni/2022\\_05\\_54\\_701.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2022_05_54_701.html)], which stipulates that officials must take care not to bring themselves or others into a conflict of interest when contacting third parties, is sufficient. According to Oriana Ivković Novokmet (GONG), the ministry also refused the obligation to publish information about meetings with lobbyists because the public is informed about important meetings with third parties on the website of the body in which the official holds office, or through social networks. One of the obligations of lobbied officials and employees is the so-called *cooling-off period*, i.e. a ban on lobbying in relation to the legislative or executive body in which they worked for a period of 18 months after leaving office.

<sup>76</sup> GRECO, Fifth Evaluation Round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies, 24 March 2020, <https://rm.coe.int/fifth-round-evaluation-report-on-croatia-preventing-corruption-and-pro/16809cff22>; GRECO, Compliance Report, 22 December 2021, <https://rm.coe.int/fifth-evaluation-round-compliance-report-on-croatia-adopted-by-greco-a/1680a4f0f6>

<sup>77</sup> European Commission, 2022 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, [https://commission.europa.eu/document/download/a8d52e13-da5b-48b5-b93b-1201cc0b4bf9\\_en?filename=27\\_1\\_194032\\_coun\\_chap\\_croatia\\_en.pdf](https://commission.europa.eu/document/download/a8d52e13-da5b-48b5-b93b-1201cc0b4bf9_en?filename=27_1_194032_coun_chap_croatia_en.pdf)

<sup>78</sup> The representative of the Ministry of Judiciary, Public Administration and Digital Transformation states that the OECD and the European Commission evaluated the draft act positively. Ivan Odeljan (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 17 September 2024.

<sup>79</sup> Ivan Odeljan (Ministry of Judiciary and Administration), interview by the IRM, 12 October 2022.

<sup>80</sup> Open

Government Partnership, Jorge Sahd and Cristian Valenzuela, Lobby Law in Chile: Democratizing access to public authorities, December 2016, [https://www.opengovpartnership.org/wp-content/uploads/2001/01/report\\_Lobby-law-in-Chile.pdf](https://www.opengovpartnership.org/wp-content/uploads/2001/01/report_Lobby-law-in-Chile.pdf)

<sup>81</sup> Open Government Partnership, Latvia: Transparency in Lobbying, 2019, <https://www.opengovpartnership.org/members/latvia/commitments/LV0042>

<sup>82</sup> Open Government Partnership, Register of Government Decision-Making (FI0032), 2019, <https://www.opengovpartnership.org/members/finland/commitments/fi0032/>

<sup>83</sup> It also includes a system for reporting irregularities (whistleblowing), a new IT solution for entering information on company ownership and a module which will enable around 40 public authorities to integrate data. Ivan Odeljan (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 17 September 2024.

<sup>84</sup> Ivan Odeljan (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 17 September 2024.

<sup>85</sup> Ministry of Judiciary, Public Administration and Digital Transformation, Lobiranje – kratki vodič, 2024, [https://mpudt.gov.hr/UserDocsImages/slike/Istaknute%20teme/Lobiranje/Lobiranje%20-%20vodi%C4%8D\\_MPUDT.pdf](https://mpudt.gov.hr/UserDocsImages/slike/Istaknute%20teme/Lobiranje/Lobiranje%20-%20vodi%C4%8D_MPUDT.pdf)

<sup>86</sup> The Commission for Resolution of Conflicts of Interest will adopt the Rulebook on maintaining the Register of Lobbyists within 60 days. Its draft was included in e-consultation with the interested public by 2 October 2024, after which the final version will be published in the Official Gazette. The e-consultation results, <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=28265>



## Section III. Participation and Co-Creation

**Croatia's multi-stakeholder forum conducted several public consultations in developing the fourth action plan and built on existing initiatives and strategic documents. The consultations were generally participatory, with decisions made consensually, although most of the more ambitious proposals were changed to fit the government's workload and plans. Lead agencies engaged civil society during implementation but there were few opportunities for civil society to affect the outcomes of commitments linked to EU-funded projects.**

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.<sup>87</sup> The IRM assesses all countries that submitted action plans from 2022 onwards under the updated Standards. However, OGP instituted a 24-month grace period to ensure a fair and transparent transition. During this time, the IRM will assess countries' alignment with the Standards and compliance with the minimum requirements.<sup>88</sup> Therefore, countries will only be found to be acting contrary to OGP process if they do not meet the minimum requirements for submitted action plans to begin in 2024 and later.

The multi-stakeholder forum, the Open Government Partnership Initiative Council (the Council),<sup>89</sup> drafted the fourth action plan and monitored its implementation. The Council consisted of 26 members including representatives of state, local, and regional authorities, civil society organizations (CSOs), academia, and the media.<sup>90</sup> The Government Office for Non-Governmental Organizations provided expert and administrative support to the Council, along with the Ministry of Foreign and European Affairs, whose Secretary of State chairs the Council. There were several changes in the Council's membership during implementation, but they did not affect the government's ability to engage civil society.<sup>91</sup> A good practice in the Council is unanimous decision-making, where a consensus is usually reached.<sup>92</sup>

CSO representatives on the Council are nominated and elected through a transparent process involving the Civil Society Development Council.<sup>93</sup> The Council has rules of procedure.<sup>94</sup> Its government members are high-level officials, so it met in Zagreb, but representatives from other parts of Croatia attended the meetings. The Council met online and in hybrid sessions during the COVID-19 pandemic (2020 and 2021). Compared to previous action plans, there was an increase in membership and more diverse representation of CSOs in the Council during the fourth action plan. For example, the Croatian Employers' Association<sup>95</sup> was represented for the first time and was active in all meetings.<sup>96</sup> The government engaged CSOs in iterative dialogue throughout the co-creation phase, although most of the more ambitious commitment proposals were changed to fit the government's workload and plans.<sup>97</sup> During the co-creation process, the Council engaged the public twice via the e-consultation portal: to gauge the priorities in the action plan and to receive feedback on the draft action plan.<sup>98</sup>

During implementation, the Council held four sessions: one online and three at the premises of the Ministry of Foreign and European Affairs. Communication among members of the Council between sessions was via email. CSOs were able to voice their opinions and recommendations on implementation at the Council's sessions.<sup>99</sup> The government also organized two conferences on open governance, in December 2022 and 2023.<sup>100</sup> The government representatives were

mostly open to dialogue and collaboration during implementation and monitoring. However, there was limited opportunity for civil society to affect the outcomes of commitments linked to EU-funded projects<sup>101</sup> as they required legislative changes or other processes with rigid guidelines. In such cases, the government provided a response. As the final commitment selection largely did not respond to stakeholders' policy priorities, stakeholders were less involved in the implementation process.

The government was constrained by time-management, legal procedures, and limited human and financial resources. Despite these constraints, civil society stakeholders commented on the good will of all government representatives involved in the OGP process. However, during the co-creation process, CSOs commented that they felt they were using their resources on a process that lacked the full support of the government.<sup>102</sup> State representatives also expressed dissatisfaction with CSO participation in the process.<sup>103</sup> For example, some organizations have repeatedly failed to participate in OGP Council meetings, failed to name new representatives after management changes, or have not participated in activities for which they were co-implementers. Similar sentiments were mentioned by stakeholders during implementation. A potential solution could be setting more ambitious commitments to bolster enthusiasm from both sides.<sup>104</sup>

Future action plans could benefit from additional communication and collaboration tools (e.g. digital platforms) and offering regular updates to stakeholders, especially in the implementation phase. To increase stakeholder engagement and commitment ambition, the Council could allow stakeholders to engage in specific activities and projects based on their expertise and interest, during co-creation and implementation. In addition, Croatia did not comply with three minimum requirements under OGP's Participation and Co-creation Standards during the co-creation process and two minimum standards during implementation (see Table 1). For the next action plan, Croatia should aim to fully comply with all minimum requirements during the co-creation and implementation phases.

**Table 1. Compliance with minimum requirements**

Minimum requirement	Met during co-creation?	Met during implementation?
<b>1.1 Space for dialogue:</b> The Council for the Open Government Partnership Initiative of the Government of the Republic of Croatia (the Council) serves as Croatia's multi-stakeholder forum. <sup>105</sup> The Council's meeting minutes and rules of operation are available on Croatia's OGP website. <sup>106</sup> The Council met four times to oversee implementation of this action plan, but only met once per year in 2022 and 2023. This fell short of OGP's requirement of meeting at least every six months. <sup>107</sup> However, two conferences on open governance were held in December 2022 and December 2023. <sup>108</sup>	No	No
<b>2.1 OGP website:</b> The Office for Cooperation with NGOs of the Government of Croatia maintains a publicly accessible website for Croatia's OGP process. <sup>109</sup> The website contains the latest action plan, details on the co-creation process for all action	Yes	Yes

plans, including minutes of meetings and links to public e-consultations. <sup>110</sup> It also includes news on activities related to the OGP process in Croatia. <sup>111</sup>		
<b>2.2 Repository:</b> The OGP website was updated regularly (several times a year) with information on co-creation and news related to the OGP process in Croatia. <sup>112</sup> However, there is no information on the website about the action plan's implementation. The website contains government self-assessment reports for previous action plans. <sup>113</sup>	Yes	No
<b>3.1 Advanced notice:</b> See IRM Action Plan Review. <sup>114</sup>	No	Not applicable
<b>3.2 Outreach:</b> See IRM Action Plan Review.	No	Not applicable
<b>3.3 Feedback mechanism:</b> See IRM Action Plan Review.	Yes	Not applicable
<b>4.1 Reasoned response:</b> See IRM Action Plan Review.	Yes	Not applicable
<b>5.1 Open implementation:</b> The Council met four times during implementation of the action plan to discuss progress on the commitments. There was opportunity for civil society to comment during the meetings, according to the meeting minutes. <sup>115</sup>	Not applicable	Yes

<sup>87</sup> Open Government Partnership, OGP Participation and Co-Creation Standards, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

<sup>88</sup> Open Government Partnership, Independent Reporting Mechanism, *Guidelines for the Assessment of OGP's Minimum Requirements*, May 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf)

<sup>89</sup> Open Government Partnership Council, Savjet inicijative Partnerstvo za otvorenu vlast, 23 September 2024, <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

<sup>90</sup> Croatia's End-of-Term Self-Assessment Draft Report, (September 2024; Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.

<sup>91</sup> Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.

<sup>92</sup> Open Government Partnership, IRM Design Report: Croatia 2018-2020, p 12, [https://www.opengovpartnership.org/wp-content/uploads/2019/12/Croatia\\_Design\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/12/Croatia_Design_Report_2018-2020_EN.pdf)

<sup>93</sup> Government Office for Cooperation with Non-Governmental Organizations, Civil Society Development Council, 23 September 2024, <https://udruga.gov.hr/savjet-za-razvoj-civilnoga-drustva/120>. The Civil Society Development Council is a special advisory body informing and collaborating with the government on all civil society matters, including nominating and selecting CSO representatives in committees. It can actively participate in discussions of the OGP Council meetings but cannot vote.

<sup>94</sup> Government Office for Cooperation with Non-Governmental Organizations, The Rules of Procedure of the OGP Council, 23 September 2024, [https://udruga.gov.hr/UserDocsImages/dokumenti/POV/Poslovnika%20Savjeta\\_izmjene%202020.pdf](https://udruga.gov.hr/UserDocsImages/dokumenti/POV/Poslovnika%20Savjeta_izmjene%202020.pdf)

<sup>95</sup> Hrvatska udruga poslodavaca, 23 September 2024, <https://www.hup.hr/>

<sup>96</sup> Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024; Arhiva zapisnika sa sjednica Savjeta inicijative Partnerstvo za otvorenu vlast (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

<sup>97</sup> According to stakeholders interviewed for the 2022-2023 Action Plan Review, [https://www.opengovpartnership.org/wp-content/uploads/2023/02/Croatia\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/02/Croatia_Action-Plan-Review_2022-2024_EN.pdf)

<sup>98</sup> 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>, and from 10 December 2021 to 3 January 2022, <https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=19426>

<sup>99</sup> OGP Council session details are found at Government Office for Cooperation with NGOs, Savjet inicijative Partnerstvo za otvorenu vlast [Open Government Partnership Council], 23 September 2024, <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

<sup>100</sup> The conference Open local and regional government – challenges and opportunities? was held on 14 December 2022 in a hybrid format, <https://udruga.gov.hr/vijesti/odrzana-konferencija-otvorena-lokalna-i-regionalna-vlast-izazovi-i-prilike/5606>, and the conference Open government in Croatia – a look into the future on 19 December 2023, <https://udruga.gov.hr/vijesti/konferencija-otvorena-vlast-u-hrvatskoj-pogled-u-buducnost/5750>. Both were organized by the Government Office for Cooperation with NGOs as a national contact point for the initiative Partnership for Open Government in Croatia.

<sup>101</sup> For example, these include activities under Commitments 9, 10, 13, 14, and 16.

<sup>102</sup> Ott and Brnić (Institute of Public Finance), correspondence with the IRM, 13 November 2020; Berković and Skender (GONG), interview by the IRM, 13 November 2020.

<sup>103</sup> Darija Marić (Government Office for Cooperation with Non-Governmental Organizations), interview by the IRM, 9 November 2020.

<sup>104</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024; Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>105</sup> Open Government Partnership Council, Savjet inicijative Partnerstvo za otvorenu vlast (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

<sup>106</sup> Open Government Partnership Council, Arhiva zapisnika sa sjednica Savjeta inicijative Partnerstvo za otvorenu vlast (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

<sup>107</sup> Open Government Partnership Council, Arhiva zapisnika sa sjednica Savjeta inicijative Partnerstvo za otvorenu vlast (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

<sup>108</sup> The conference Open local and regional government – challenges and opportunities? was held on 14 December 2022 in a hybrid format, <https://udruga.gov.hr/vijesti/odrzana-konferencija-otvorena-lokalna-i-regionalna-vlast-izazovi-i-prilike/5606>, and the conference Open government in Croatia – a look into the future on 19 December 2023, <https://udruga.gov.hr/vijesti/konferencija-otvorena-vlast-u-hrvatskoj-pogled-u-buducnost/5750>. Both were organized by the Government Office for Cooperation with NGOs as a national contact point for the initiative Partnership for Open Government in Croatia.

<sup>109</sup> Partnerstvo za otvorenu vlast (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/271>

<sup>110</sup> Akcijski plan za provedbu inicijative Partnerstvo za otvorenu vlast za razdoblje 2022.-2023. godine (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/akcijski-plan-za-provedbu-inicijative-partnerstvo-za-otvorenu-vlast-za-razdoblje-2022-2023-godine/5165>

<sup>111</sup> Vijesti (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/vijesti/8?trazi=1&tip=&tip2=&tema=47&datumod=&datumdo=&pojam=&page=2>

<sup>112</sup> Partnerstvo za otvorenu vlast (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/271>

<sup>113</sup> Action Plan 2012-2013, <https://udruga.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>; Action Plan 2014-2016, <https://udruga.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>; Action Plan 2018-2020, <https://udruga.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>

<sup>114</sup> Open Government Partnership, Croatia Action Plan Review 2022-2023, <https://www.opengovpartnership.org/documents/croatia-action-plan-review-2022-2023/>

<sup>115</sup> Open Government Partnership Council, Arhiva zapisnika sa sjednica Savjeta inicijative Partnerstvo za otvorenu vlast (Ured za udruge Vlade Republike Hrvatske, 23 September 2024), <https://udruga.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289>

## Section IV. Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as promising or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle.<sup>116</sup> The IRM commenced the research process after the first year of implementation of the action plan with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP repository.<sup>117</sup>

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>118</sup> The level of completion for all commitments is assessed as one of the following:

- *No evidence available*
- *Not started*
- *Limited*
- *Substantial*
- *Complete*

### Early Results

The IRM assesses the level of results achieved from the implementation of commitments that have a clear open government lens, a high level of completion or show evidence of achieving early results (as defined below). It considers the expected aim of the commitment prior to its implementation, the specific country context in which the commitment was implemented, the specific policy area and the changes reported.

The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector,
  - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Ivona Mendeš Levak and was reviewed by Ernesto Velasco-Sánchez, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP).<sup>119</sup> For more information, refer to the "IRM Overview" section of the OGP website.<sup>120</sup> A glossary on IRM and OGP terms is available on the OGP website.<sup>121</sup>

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<sup>116</sup> For definitions of OGP terms, such as co-creation and promising commitments, see OGP Glossary, <https://www.opengovpartnership.org/glossary/>

<sup>117</sup> Croatia, OGP Repository, 15 September 2024, <https://udruga.gov.hr/partnerstvo-za-otvorenu-vlast-271/271>

<sup>118</sup> The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "potential for results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.

<sup>119</sup> Open Government Partnership, Independent Reporting Mechanism, *International Experts Panel*, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>

<sup>120</sup> Open Government Partnership, *IRM Overview*, <https://www.opengovpartnership.org/irm-guidance-overview/>

<sup>121</sup> Open Government Partnership, *OGP Glossary*, <https://www.opengovpartnership.org/glossary/>



## Annex I. Commitment Data<sup>122</sup>

### Commitment 1: Implementing Right to Information

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|--|---|

This commitment aimed to evaluate and improve the normative framework for the exercise of the right to access information and the reuse of information. It was fully completed.<sup>123</sup> The Information Commissioner's Office offered six online and in-person training programs for hundreds of participants to raise awareness among citizens, CSOs, and the media about the procedures of public authorities under the Right to Access Information Act.<sup>124</sup> Also, independent experts carried out an evaluation of the Act and published a report in 2023 with findings and recommendations.<sup>125</sup> However, there is insufficient evidence to assess whether these activities improved access to information in Croatia.

Civil society stakeholders noted that it is becoming increasingly difficult for citizens, CSOs, and other interested parties to access public information, compared to when the Act was introduced.<sup>126</sup> Stakeholders mentioned they need more practical guidance on how to request information and how to overcome the administrative barriers that some public offices use.<sup>127</sup> Stakeholders attribute problems in access to information to irregularities in the application of the normative framework, not to deficiencies in the framework.<sup>128</sup> Stakeholders also reported negative trends in the way public authorities handle requests for information (e.g. receiving and sending public information via postal service instead of electronically) and the share of requests that go unanswered.

### Commitment 2: Implementing Legislation on Personal Data Protection

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|--|---|

This commitment aimed to raise knowledge and competences about rights and obligations under the General Data Protection Regulation (GDPR).<sup>129</sup> It was fully completed.<sup>130</sup> According to its 2023 annual report, the Personal Data Protection Agency carried out 45 educational activities during the implementation period.<sup>131</sup> The Agency's communication activities in 2023 were aimed at students, managers, and processors from all sectors, data protection officers from the private and public sectors, state administration bodies and public authorities, professional associations, NGOs, and micro, small and medium-sized entrepreneurs. This commitment was a positive effort in raising awareness of rights and obligations under the GDPR. However, there is insufficient evidence to conclude that these activities have enhanced trust between citizens and the state.

### Commitment 3: Fiscal Transparency



<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Moderate Results</li> </ul>
This commitment is assessed in Section II above.	
<b>Commitment 4: Parliamentary Openness and Transparency</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Unclear</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>The commitment aimed to make the Parliament more open to students and citizens. It was fully implemented. The Parliament organized various activities for students, including visits to the Parliament, online quizzes, writing competitions, simulated parliament sessions, lectures, discussions, educational workshops, and meetings with Parliament members.<sup>132</sup> However, there is a lack of evidence to assess whether these activities have built trust between citizens and the Parliament.</p>	
<b>Commitment 5: Referenda Transparency</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>This commitment aimed to establish a Record of Referendum Initiatives under the State Electoral Commission, consisting of the collection, recording, and publication of information on local and national referenda. The Commission also planned to train persons involved in conducting referenda. These activities were postponed, as there were no changes to the Referenda Act during the implementation period. The Commission developed a guide on the rights and obligations of the organizing committees when financing referenda, intended for members of the referendum committees.<sup>133</sup> This guide has been updated in accordance with changes in legal regulations, e.g. to reflect the change in official currency (on 1 January 2023, the euro replaced the Croatian kuna).<sup>134</sup></p> <p>According to stakeholders, referenda legislation will probably be amended during the mandate of the current government. Opposition parties announced they would tie amendments to the Referenda Act to changes in abortion legislation, which has not been changed in several decades.<sup>135</sup></p>	
<b>Commitment 6: Transparency in Public Funding of CSO Programs/Projects</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>

With this commitment, the Government Office for Cooperation with NGOs<sup>136</sup> aimed to establish a new IT system to monitor and valorize the distribution of funds for programs and projects of public good implemented by CSOs.<sup>137</sup> It also aimed to update the public database on projects and programs implemented by CSOs, and deliver training on the criteria, standards, and procedures for financing and contracting these programs and projects. In addition, the commitment included training for leaders and employees of commercial companies in majority public ownership about the same criteria, standards, and procedures.

The commitment's completion was limited. The IT system took longer to create than expected and will be completed in 2025.<sup>138</sup> While some training was carried out, there is a lack of evidence to ascertain whether this improved transparency in public funding of CSO programs and projects. Stakeholders agreed that the new IT system will be a useful resource to show how CSOs are funded and which of them spend public funds in an agreed-upon manner.<sup>139</sup>

### **Commitment 7: Transparency and Accountability of Commercial Companies in Majority Ownership by Local and Regional Self-Government**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
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This commitment aimed to strengthen transparency in asset management of local and regional authorities. It entailed a training program for commercial companies with majority public ownership on the standards for awarding donations and sponsorships to CSOs. The Government Office for Cooperation with NGOs<sup>140</sup> conducted four workshops for 54 participants in 2022 and 2023, completing the only envisaged activity.<sup>141</sup>

Civil society stakeholders believe that future commitments on this topic could strengthen the ethical norms in corporate management and should be led by the Commission for Resolution of Conflicts of Interest.<sup>142</sup> They also recommend involving citizens and CSOs in public companies' supervisory boards.<sup>143</sup> Croatia's accession for OECD membership could provide a push toward responsible corporate management, especially in public companies.<sup>144</sup>

### **Commitment 8: Media Regulatory Framework**

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|---|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Substantial</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
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This commitment aimed to draft the new Media Act. It was carried over from Croatia's third action plan (2018-2020). The commitment was delayed. According to the government, the deviation from the deadline was due to work on the European Act on Freedom of the Media, which will be implemented partially through the Media Act.<sup>145</sup> According to the Croatian Journalists' Association (CJA),<sup>146</sup> there were two meetings of the working group established by the Ministry of Culture and Media (late 2020 and spring 2023). The draft law presented at the second meeting differed from the working group's proposals from the first meeting. As the draft received mainly negative feedback, the ministry rescinded it, stating it was not a draft

but “a proposal of a text for discussion.”<sup>147</sup> Civil society and watchdog groups have criticized the current reform of the Media Law, particularly the limited consultations during its development.<sup>148</sup> These groups contested certain provisions in the previous draft, such as giving publishers undue influence over editorial lines and politicizing the appointment process of members of the Agency for Electronic Media. A new draft was expected in the fall of 2024, but this has not yet been communicated to relevant CSOs, such as the CJA.<sup>149</sup>

At the end of 2023, the Minister of Culture and Media mentioned that the new law will follow the National Culture and Media Development Plan,<sup>150</sup> and a new working group will be formed to begin drafting it.<sup>151</sup> A CJA representative fears that they will miss the public call for participation in the working group and be excluded from the drafting process.<sup>152</sup> The minister has proposed joining the Media Act and the Electronic Media Act into a single legislation, but that has yet to be confirmed.<sup>153</sup>

The only milestone that was partially completed was establishing a media fact-checking system. This system includes procedures, rules and registers, technological programs, platforms and systems of communication with the media, and other activities done by the Electronic Media Agency.<sup>154</sup> The system will be completed by mid-2026. A study on strengthening society’s resistance to disinformation<sup>155</sup> was prepared in May 2023, and two public calls for the selection of legal entities dealing with the verification of media information were conducted, with 21 fact-checking projects receiving funding.<sup>156</sup> Most of the started projects have established fact-checking platforms on an array of topics.<sup>157</sup> The Agency is also preparing a collaborative platform for the publication of verified facts and information from each of the 21 projects.

### Commitment 9: Improving the Central Catalogue of Official Documentation

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
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This commitment was linked to an EU-funded project.<sup>158</sup> It aimed to improve the reception, processing, and publication of official documents. It also involved educating persons handling official documents on delivery and use of the Central Catalogue of Official Documentation.<sup>159</sup> The commitment was fully implemented by July 2023. The improvements included increased availability of documents to end users, the development of a search engine for official documents as a recognizable Croatian product, and better information for civil servants on the legal obligations to proactively publish official documents in accordance with the Right to Access to Information Act.<sup>160</sup> The government intends to improve the search engine of the Central Catalogue by including local legislation in search requests.<sup>161</sup> The government also carried out educational programs and workshops for 883 civil servants, and produced four video materials on the Central Catalogue, the delivery of official documents, and search and review of collections.<sup>162</sup>

This commitment has improved openness and transparency of the public sector. However, stakeholders mentioned that they do not use this new search engine when searching for regulations, as they are used to using the Official Gazette<sup>163</sup> (public, mostly free of charge) or

the Zakon.hr website<sup>164</sup> (private, mostly requiring a fee).<sup>165</sup> They also commented that this type of data could be the basis for new initiatives, e.g. public tenders for businesses and CSOs to use this data in their work (research, analyses, developing apps, etc.). This could have multiplying effects, as these databases are currently mostly unused.<sup>166</sup>

### Commitment 10: Improving the Central Registry of State Assets

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
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This commitment, linked to an EU-funded project,<sup>167</sup> aimed to improve the Central Registry of State Assets.<sup>168</sup> It was fully implemented by December 2023. The system was upgraded with modules for real estate, movable property, rights, and financial assets.<sup>169</sup> The modules enable more precise tracking and retrieval of assets through integration with other core registries, including land registers, vehicles registers, court registries, and many others. According to the government, the accuracy and completeness of the data in the register depends on the timely entry and updating by the person obliged by the public body they work in. In case a public body fails to submit property information to the register without delay, and no later than within 60 days of the change, sanctions from the misdemeanor provisions of the Central Register of State Property Act (Article 8) apply.<sup>170</sup>

This commitment improved previous practices regarding state asset management. GONG published a study on the issue in 2022, some of whose concerns have been addressed by this latest upgrade of the register. For example, the register is no longer in its test phase.<sup>171</sup> However, the study noted that the register should contain, in addition to the description of the assets (land registry plot and cadastral municipality, area, location and address, ownership information) and its current user, the payment amounts for asset use, the act determining the user and amount, and any debt accumulated. If the asset is for sale, the register should publicly announce how the purchase price was determined. If it is a lease, rental or compensation for illegal use, acts determining the amounts should be publicly announced. GONG believes this type of information, if relevant data is fully available, would facilitate anti-corruption monitoring.<sup>172</sup> Future OGP action plans could address the deficiency of legal provisions on clear criteria for various forms of disposal of state assets.<sup>173</sup>

### Commitment 11: Protection of Persons Reporting Corruption

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
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This commitment aimed to train different groups on whistleblower protection, including judicial officials, persons in positions of trust, union representatives, and providers of free legal aid and their employees. It was fully completed. The Judicial Academy conducted five one-day workshops for 71 judicial officials and advisors in the judiciary on whistleblower protection.<sup>174</sup> The former Ministry of Justice and Public Administration held three trainings for 52 persons of trust and employees related to the implementation of the Whistleblower

Protection Act.<sup>175</sup> It also held a training for 12 representatives of legal entities owned by the state.<sup>176</sup> The Ministry of Justice, Public Administration and Digital Transformation is continuing its work on the issue by publishing guidelines for employers,<sup>177</sup> establishing an emotional support network for whistleblowers, conducting surveys, and analyzing implementation of the Whistleblower Protection Act in legal persons of special interest to the state in accordance with OECD recommendations on improving corporate management.<sup>178</sup> There is a lack of evidence to prove these activities achieved meaningful change in protecting whistleblowers.

Stakeholders believe that future commitments on whistleblower protection should include the State Ombudsman, which has legal competence in this area.<sup>179</sup> The State Ombudsman's report on whistleblower protection in 2023 states that the Ministry of Justice, Public Administration and Digital Transformation and the Judicial Academy should continue to train judicial officials on the application of the Whistleblower Protection Act.<sup>180</sup> Experts recommend changing the mindsets in organizations and the public, since at the moment only 22 percent of frauds in Croatia are discovered owing to whistleblowing, compared to over 40 percent globally.<sup>181</sup>

**Commitment 12: Improving Anti-Corruption Legislation**

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| <ul style="list-style-type: none"><li>• <b>Verifiable:</b> Yes</li><li>• <b>Does it have an open government lens?</b> Yes</li><li>• <b>Potential for results:</b> Substantial</li></ul> | <ul style="list-style-type: none"><li>• <b>Completion:</b> Complete</li><li>• <b>Early results:</b> Significant Results</li></ul> |
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This commitment is assessed in Section II above.

**Commitment 13: Ongoing Data Opening**

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| <ul style="list-style-type: none"><li>• <b>Verifiable:</b> Yes</li><li>• <b>Does it have an open government lens?</b> Yes</li><li>• <b>Potential for results:</b> Modest</li></ul> | <ul style="list-style-type: none"><li>• <b>Completion:</b> Complete</li><li>• <b>Early results:</b> Moderate Results</li></ul> |
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This commitment aimed to support public sector bodies in publishing open data to the open data portal.<sup>182</sup> It was fully completed.<sup>183</sup> According to government reports, 484 public bodies published 2,645 datasets on the portal (1 February 2024), an increase of 4 percent and 49 percent, respectively, compared to 2022. All requests for operational and technical support from public authorities sent from the portal are resolved on the same day, except in cases when the intervention of an external collaborator who maintains the portal is required.

The second milestone was modified so that instead of conducting two educational programs per year, materials have been uploaded to the Moodle system on the portal with user instructions on how to publish datasets. Within an EU-funded project,<sup>184</sup> 468 state and public officials participated in 18 workshops on how to upload data to the portal and fulfill the legal obligation to publish data. There are many officials involved in opening data, whose increased knowledge of publication practices could over time increase the publication of new and important datasets. The increase of the number of bodies that have published datasets indicate that the educational activities in the field of reuse and open data have improved proactive publication practices.

Beyond the commitment, the Ministry of Justice, Public Administration and Digital Transformation established a unique synchronization mechanism for improving the publication of open data including a centralized transformation service for publication of open data in machine-readable format; upgraded the open data portal component to the latest version of the Comprehensive Knowledge Archive Network (CKAN) platform; and supported automatic publication of open data from various sources and data formats on the portal – adaptation of sources/databases and integration with a unique service. The project also enabled the semi-automatic/automatic publication of datasets from eight public authorities.<sup>185</sup> Other bodies will also be able to adapt their information systems to automatically publish data on the portal.<sup>186</sup>

Although the government is encouraging the sharing of data of public authorities, civil society stakeholders noted there is little uptake of data by the private and civil sectors.<sup>187</sup> As in Commitment 9, stakeholders believe that this data could be the basis for new initiatives, such as public tenders for businesses and CSOs to use this data (apps, analyses, visualizations, etc.). Given the significant obligations of public authorities to prepare data for reuse, especially high-value datasets per the EU Open Data Directive, the ministry adopted a new Open Data Policy and Action Plan in 2023 in 2024 respectively.<sup>188</sup>

**Commitment 14: Improving Public Consultations**

<ul style="list-style-type: none"><li>• <b>Verifiable:</b> Yes</li><li>• <b>Does it have an open government lens?</b> Yes</li><li>• <b>Potential for results:</b> Modest</li></ul>	<ul style="list-style-type: none"><li>• <b>Completion:</b> Substantial</li><li>• <b>Early results:</b> No Notable Results</li></ul>
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This commitment aimed to improve Croatia’s e-consultations system and educate public officials on how to conduct online consultations. This commitment was influenced by the European Commission’s Better Regulations Guidelines.<sup>189</sup> Croatia adopted its own Better Regulations Policy Instruments Act<sup>190</sup> and accompanying ordinance which entered into force in early 2024.<sup>191</sup> These documents centralize regulations, including public consultations.

Of the five milestones, three were completed.<sup>192</sup> An EU-funded project which ended in December 2023 resulted in modernizing the interface, launching a mobile app version of the e-consultation system (responsive design), and integrating it with the National Identification and Authentication System (NIAS). The e-consultation system was also adapted for use by local and regional self-government units. However, only the City of Šibenik is using the system, as of October 2024. Other municipalities and cities in Croatia use their own public consultation systems, which are not integrated with the national system.<sup>193</sup>

CSOs have expressed skepticism over some of these changes, especially the integration with the NIAS.<sup>194</sup> Only persons that authorized to represent CSOs can comment on their behalf in the e-consultation system, which GONG sees an unnecessary administrative burden.<sup>195</sup> Over 40 CSOs petitioned the Ministry of Justice, Public Administration and Digital Transformation and the Information Commissioner to allow them to participate in e-consultations.<sup>196</sup> In order to use this service, citizens now have to register through the e-Citizens system using some form of identification through NIAS, such as a bank token or e-ID. In the beginning, a high security credential was required for CSOs.<sup>197</sup> This requirement was later reduced after CSOs



contested it as being complicated and administratively burdensome for citizens to participate in decision-making processes.<sup>198</sup> According to civil society, the earlier e-consultation system worked well, and the changes were unnecessary.

According to GONG, participation in e-consultations in Croatia has declined in recent years due to shortened durations of consultations, opening consultations during the summertime, and an excessive use of the phrase “acknowledged” in reply to comments, rather than a detailed response.<sup>199</sup> GONG suggested that for laws for which citizens express special interest, the government organizes public hearings where the proponent explains and defends the changes to citizens and answers their questions.<sup>200</sup> The Croatian Journalists’ Association has proposed commitments on citizen assemblies for the next OGP action plan.<sup>201</sup>

### Commitment 15: OGP at Local and Regional Levels

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
|--|--|

This commitment aimed to support the implementation of OGP goals at the local and regional levels, particularly in the areas of open data and public consultations. It had limited completion.<sup>202</sup> The first milestone focused on promoting OGP in municipalities, cities, and counties. The Government Office for Cooperation with NGOs organized several events in 2022 and 2023, where examples of OGP Local governments were presented.<sup>203</sup> As a result of these efforts, Zagreb became the first Croatian city to join the OGP Local program in April 2024, with GONG as its supporting partner. The other two milestones were less successful. Rijeka, Zagreb, Krk, Virovitica, Varaždin, Brod-Posavina County and Grožnjan implemented their first open data portals, but it is unclear whether these portals were the result of this commitment. In addition, the national e-consultation system was upgraded for use by local and regional authorities, as discussed in Commitment 14. Civil society stakeholders recommend introducing citizen assemblies at the local and regional levels for future action plans.<sup>204</sup>

### Commitment 16: OGP Sustainability

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|--|---|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
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This commitment was linked to an EU-funded project and aimed to add content related to OGP, transparency, and anti-corruption to school curricula. It mostly repeated from the previous action plan and was implemented. The Ministry of Regional Development and EU Funds organized for students at eight secondary schools education activities on civic monitoring of public finances, the use of publicly available (open) data, the activities of OGP, and visits to national, regional, and local institutions.<sup>205</sup> The fourth milestone involved adding OGP to the curricula for Civic Education, Politics and Economics, in teacher and support staff programs, and to competitions and festivals organized by the Education and Teacher Training Agency and through co-financing CSO projects in extra-institutional education of children and youth. There is a lack of evidence to show that the commitment achieved early results in



building trust between young people and public institutions.

<sup>122</sup> Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Croatia's action plan: <https://www.opengovpartnership.org/documents/croatia-action-plan-2022-2024-june/>
3. For more information on the assessment of the commitments' design, see Croatia's Action Plan Review: <https://www.opengovpartnership.org/documents/croatia-action-plan-review-2022-2023/>

<sup>123</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024.

<sup>124</sup> Zakon.hr, Right to Access Information Act, 25 September 2024, <https://www.zakon.hr/z/126/Zakon-o-pravu-na-pristup-informacijama>

<sup>125</sup> Izvještaj o vrednovanju učinaka Zakona o pravu na pristup informacijama, Zagreb, March 2023, <https://pristupinfo.hr/wp-content/uploads/2023/06/Sazetak-izvjestaja-o-vrednovanju-ucinka-ZPPI-FINAL-za-web.pdf?x78059>

<sup>126</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024; Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>127</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024.

<sup>128</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024.

<sup>129</sup> General Data Protection Regulation, 24 September 2024, <https://gdpr-info.eu/>

<sup>130</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024.

<sup>131</sup> Godišnje izvješće o radu Agencije za zaštitu osobnih podataka za razdoblje od 1. siječnja do 31. prosinca 2023. godine, March 2024, [https://sabor.hr/sites/default/files/uploads/sabor/2024-05-20/133902/GOD\\_IZVJ\\_AZOP\\_2023.pdf](https://sabor.hr/sites/default/files/uploads/sabor/2024-05-20/133902/GOD_IZVJ_AZOP_2023.pdf)

<sup>132</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024.

<sup>133</sup> Izbori.hr, 24 September 2024, <https://www.izbori.hr/online-edukacija/referendum/>

<sup>134</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024.

<sup>135</sup> Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>136</sup> Ured za udruge, 24 September 2024, <https://udruge.gov.hr/financiranje-programa-i-projekata-udruga-iz-javnih-izvora/2772>

<sup>137</sup> In accordance with Article 56 of the Regulation on the criteria, standards, and procedures of financing and contracting programs and projects of interest to the public good implemented by associations.

<sup>138</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024; Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.

<sup>139</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024; Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>140</sup> Ured za udruge, 24 September 2024, <https://udruge.gov.hr/financiranje-programa-i-projekata-udruga-iz-javnih-izvora/2772>

<sup>141</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024; Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.

<sup>142</sup> Povjerenstvo za odlučivanje o sukobu interesa, 24 September 2024, <https://www.sukobinteresa.hr/>

<sup>143</sup> Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>144</sup> Ministry of Finance, Corporate governance, 25 September 2024, <https://mfin.gov.hr/istaknute-teme/trgovacka-drustva-2566/korporativno-upravljanje/3523>. The OECD published a review on the corporate governance of state-owned enterprises in Croatia, June 2021, [https://www.oecd-ilibrary.org/finance-and-investment/oecd-review-of-the-corporate-governance-of-state-owned-enterprises-croatia\\_b4a46863-en](https://www.oecd-ilibrary.org/finance-and-investment/oecd-review-of-the-corporate-governance-of-state-owned-enterprises-croatia_b4a46863-en), which served as the basis for the Ministry of Finance's Action Plan, September 2021), [https://mfin.gov.hr/UserDocsImages//dokumenti/trg\\_dr//Akcijski%20plan%20za%20implementaciju%20preporuka%20OECD-a%20za%20korporativno%20unaprje%C4%91enja%20upravljanja%20u%20PO%20u%20vlasni%C5%A1tvu%20RH.pdf](https://mfin.gov.hr/UserDocsImages//dokumenti/trg_dr//Akcijski%20plan%20za%20implementaciju%20preporuka%20OECD-a%20za%20korporativno%20unaprje%C4%91enja%20upravljanja%20u%20PO%20u%20vlasni%C5%A1tvu%20RH.pdf)

<sup>145</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024).

<sup>146</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024.

<sup>147</sup> Index.hr, Ministarstvo o Zakonu o medijima: To nije konačan prijedlog, nismo numerirali članke, 20 July 2023, <https://www.index.hr/vijesti/clanak/ministarstvo-o-zakonu-o-medijima-to-nije-konacan-prijedlog-nismo-numerirali-clanke/2481138.aspx>

<sup>148</sup> Article 19, Croatia: Great challenges ahead to improve media freedom, 25 September 2024, <https://www.article19.org/resources/croatia-great-challenges-ahead-to-improve-media-freedom/>

<sup>149</sup> Article 19, Croatia: Great challenges ahead to improve media freedom 25 September 2024, <https://www.article19.org/resources/croatia-great-challenges-ahead-to-improve-media-freedom/>; Melisa Skender (HND), interview by the IRM, 13 September 2024.

<sup>150</sup> Nacionalni plan razvoja kulture i medija za razdoblje od 2023. do 2027. godine (Ministarstvo kulture i medija, 28 December 2023), <https://min->

[kulture.gov.hr/UserDocsImages/dokumenti/Nacionalni%20plan%20razvoja%20kulture%20i%20medija/Nacionalni%20plan\\_oba.pdf](https://kulture.gov.hr/UserDocsImages/dokumenti/Nacionalni%20plan%20razvoja%20kulture%20i%20medija/Nacionalni%20plan_oba.pdf)

<sup>151</sup> Index.hr, Ministrica: U novi zakon možda bude uključen i zakon o elektroničkim medijima, 11 September 2024, [https://www.index.hr/vijesti/clanak/ministrica-zakon-o-medijima-se-mora-donijeti-uskoro-se-formira-radna-skupina/2597471.aspx?index\\_tid=563031&index\\_ref=naslovnica\\_vijesti\\_najnovije\\_d](https://www.index.hr/vijesti/clanak/ministrica-zakon-o-medijima-se-mora-donijeti-uskoro-se-formira-radna-skupina/2597471.aspx?index_tid=563031&index_ref=naslovnica_vijesti_najnovije_d)

<sup>152</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024.

<sup>153</sup> Index.hr, Ministrica: U novi zakon možda bude uključen i zakon o elektroničkim medijima, 11 September 2024, [https://www.index.hr/vijesti/clanak/ministrica-zakon-o-medijima-se-mora-donijeti-uskoro-se-formira-radna-skupina/2597471.aspx?index\\_tid=563031&index\\_ref=naslovnica\\_vijesti\\_najnovije\\_d](https://www.index.hr/vijesti/clanak/ministrica-zakon-o-medijima-se-mora-donijeti-uskoro-se-formira-radna-skupina/2597471.aspx?index_tid=563031&index_ref=naslovnica_vijesti_najnovije_d)

<sup>154</sup> Agencija za elektroničke medije, 2 October 2024, <https://www.aem.hr/>

<sup>155</sup> Electronic Media Agency, Marijana Grbeša Zenznerović, Iva Nenadić: Strengthening Resilience to Disinformation: The State of Affairs and Guidelines for Action, May 2023, [https://npoo.aem.hr/wp-content/uploads/sites/2/2023/05/Study\\_Disinformation\\_eng.pdf](https://npoo.aem.hr/wp-content/uploads/sites/2/2023/05/Study_Disinformation_eng.pdf)

<sup>156</sup> All information on establishing a media fact-checking system, <https://npoo.aem.hr/>

<sup>157</sup> Some of the projects' fact-checking platforms, <https://npoo.aem.hr/projekti/>

<sup>158</sup> Uspostava integralnog sustava za upravljanje službenom dokumentacijom Republike Hrvatske, 25 September 2024, <https://rdd.gov.hr/projekti-i-eu-projekti/eu-projekti/ustpostava-integralnog-sustava-za-upravljanje-sluzbenom-dokumentacijom-republike-hrvatske/330>

<sup>159</sup> Središnji katalog službenih dokumenata RH, 25 September 2024, <https://sredisnjikatalogrh.gov.hr/sredisnji-katalog/pravni-propisi>

<sup>160</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024; Lidija Suman (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 3 October 2024.

<sup>161</sup> Lidija Suman (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 3 October 2024.

<sup>162</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024.

<sup>163</sup> Narodne novine, 4 October 2024, <https://narodne-novine.nn.hr/>

<sup>164</sup> Zakon.hr, 4 October 2024, <https://www.zakon.hr/>

<sup>165</sup> Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024; Melisa Skender (HND), interview by the IRM, 13 September 2024; and Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>166</sup> Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>167</sup> Unaprjeđenje sustava evidencije i upravljanja državne imovine, 25 September 2024, <https://rdd.gov.hr/projekti-i-eu-projekti/eu-projekti/unaprijedjenje-sustava-evidencije-i-upravljanja-drzavne-imovine/1460>

<sup>168</sup> Središnji registar državne imovine, 27 September 2024, <https://registarimovine.gov.hr/web/guest/javni-preglednik>

<sup>169</sup> Lidija Suman (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 3 October 2024.

<sup>170</sup> Lidija Suman (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 3 October 2024.

<sup>171</sup> GONG, Maja Đerek: (Ne)upravljanje državnim nekretninama – netransparentnost, potencijal i preporuke, 2022, <https://gong.hr/wp-content/uploads/2022/10/Neupravljanje-drzavnim-nekretninama-Netransparentnost-potencijal-i-preporuke-1.pdf>

<sup>172</sup> Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.

<sup>173</sup> GONG, Maja Đerek: (Ne)upravljanje državnim nekretninama – netransparentnost, potencijal i preporuke, 2022, p 10, <https://gong.hr/wp-content/uploads/2022/10/Neupravljanje-drzavnim-nekretninama-Netransparentnost-potencijal-i-preporuke-1.pdf>

<sup>174</sup> Pravosuđna akademija, 24 September 2024, <https://www.pak.hr/>

<sup>175</sup> Ministarstvo pravosuđa, uprave i digitalne transformacije, 24 September 2024, <https://mpudt.gov.hr/>

<sup>176</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024.

<sup>177</sup> Podsjetnik za primjenu za poslodavce, Zakon o zaštiti prijavitelja nepravilnosti (Ministarstvo pravosuđa i uprave, 2022), <https://mpudt.gov.hr/UserDocsImages/dokumenti/Podsjetnik%20za%20primjenu%20za%20poslodavce,%20Zakon%20o%20za%C5%A1titi%20prijavitelja%20nepravilnosti.pdf>

<sup>178</sup> Ivan Odeljan (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 17 September 2024.

<sup>179</sup> Pučka pravobraniteljica, 24 September 2024, <https://www.ombudsman.hr/hr/>; Melisa Skender (HND), interview by the IRM, 13 September 2024.

<sup>180</sup> Izvješće Pučke pravobraniteljice za 2023. godinu (Pučka pravobraniteljica, 2024), <https://www.ombudsman.hr/hr/interaktivno-izvjescje-za-2023/>; Chapter on whistleblower protection, <https://www.ombudsman.hr/hr/zastita-prijavitelja-nepravilnosti-2023/>

<sup>181</sup> Suzana Varošaneć: Zakon o zviždačima – žrtva našeg mentalnog sklopa (Poslovni.hr, 26 February 2023), <https://www.poslovni.hr/hrvatska/zakon-o-zvizdacima-%E2%80%92-zrtva-naseg-mentalnog-sklopa-4378315>

<sup>182</sup> Portal otvorenih podataka, 30 September 2024, <https://data.gov.hr/>

<sup>183</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024.

- <sup>184</sup> Prilagodba informacijskih sustava tijela javnog sektora Portalu otvorenih podataka (Open Data), 30 September 2024, <https://rdd.gov.hr/projekti-i-eu-projekti/eu-projekti/prilagodba-informacijskih-sustava-tijela-javnog-sektora-portal-otvorenih-podataka-open-data/374>
- <sup>185</sup> The City of Zagreb, State Geodetic Administration, Ministry of Justice and Administration, Municipality of Legrad, Zagreb County, Ministry of Science, Ministry of Culture and Media, HAKOM.
- <sup>186</sup> Lidija Suman (Ministry of Judiciary, Public Administration and Digital Transformation), interview by the IRM, 3 October 2024.
- <sup>187</sup> Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024; Melisa Skender (HND), interview by the IRM, 13 September 2024; and Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.
- <sup>188</sup> Izvješće o provedbi Zakona o pravu na pristup informacijama za 2023. godinu (Povjerenik za informiranje, March 2024), <https://pristupinfo.hr/wp-content/uploads/2024/03/Izvjesce-o-provedbi-ZPPI-za-2023.pdf?x80257>
- <sup>189</sup> European Commission, Better Regulation Guidelines, 2021, [https://commission.europa.eu/system/files/2021-11/swd2021\\_305\\_en.pdf](https://commission.europa.eu/system/files/2021-11/swd2021_305_en.pdf)
- <sup>190</sup> Parliament of Croatia, Zakon o instrumentima politike boljih propisa (Official Gazette, 155/23), [https://narodne-novine.nn.hr/clanci/sluzbeni/2023\\_12\\_155\\_2360.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2023_12_155_2360.html)
- <sup>191</sup> Government of the Republic of Croatia, Uredba o metodologiji i postupku provedbe instrumenata politike boljih propisa (Official Gazette, 155/23), [https://narodne-novine.nn.hr/clanci/sluzbeni/2024\\_02\\_19\\_303.html](https://narodne-novine.nn.hr/clanci/sluzbeni/2024_02_19_303.html)
- <sup>192</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024; Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.
- <sup>193</sup> e-Savjetovanja, 30 September 2024, <https://esavjetovanja.gov.hr/ECon/Dashboard>
- <sup>194</sup> Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.
- <sup>195</sup> GONG, Javne rasprave u Hrvatskoj: Tko izdrži, sudjelovat će, 17 September 2024. <https://gong.hr/2024/09/17/javne-rasprave-u-hrvatskoj-tko-izdrzi-sudjelovat-ce/>
- <sup>196</sup> GONG, Digitalnim barijerama protiv sudjelovanja javnosti: Više od 40 udruga traži od Ministarstva uprave da im omogući komentiranje zakona, 7 June 2024, <https://gong.hr/2024/06/07/digitalnim-barijerama-protiv-sudjelovanja-javnosti-vise-od-40-udruga-trazi-od-ministarstva-uprave-da-im-omoguci-komentiranje-zakona/>
- <sup>197</sup> The authorized representative must activate an electronic ID card with the Ministry of Interior, install and use a special application on their mobile phone, use a reader or a crypto-device just to be able to access the e-Citizens system at all.
- <sup>198</sup> GONG, Javne rasprave u Hrvatskoj: Tko izdrži, sudjelovat će, 17 September 2024, <https://gong.hr/2024/09/17/javne-rasprave-u-hrvatskoj-tko-izdrzi-sudjelovat-ce/>
- <sup>199</sup> GONG, Javne rasprave u Hrvatskoj: Tko izdrži, sudjelovat će, 17 September 2024, <https://gong.hr/2024/09/17/javne-rasprave-u-hrvatskoj-tko-izdrzi-sudjelovat-ce/>
- <sup>200</sup> Ibid.
- <sup>201</sup> Melisa Skender (HND), interview by the IRM, 13 September 2024.
- <sup>202</sup> Croatia's End-of-Term Self-Assessment Draft Report, September 2024; Saša Šegrt (Government Office for Cooperation with NGOs), interview by the IRM, 31 July 2024.
- <sup>203</sup> E.g., in Madrid (Spain), Buenos Aires (Argentina), Austin (USA), and Kaduna State (Nigeria).
- <sup>204</sup> Oriana Ivković Novokmet (GONG), interview by the IRM, 17 September 2024.
- <sup>205</sup> U školi otvorene kohezije, ASOC (MRREUF), <https://razvoj.gov.hr/vijesti/urucena-priznanja-za-uspjesno-sudjelovanje-u-projektu-asoc-at-school-of-open-cohesion/5466>