

GAP ANALYSIS



EUROPEAN COMMISSION'S RULE OF LAW REPORT

2026

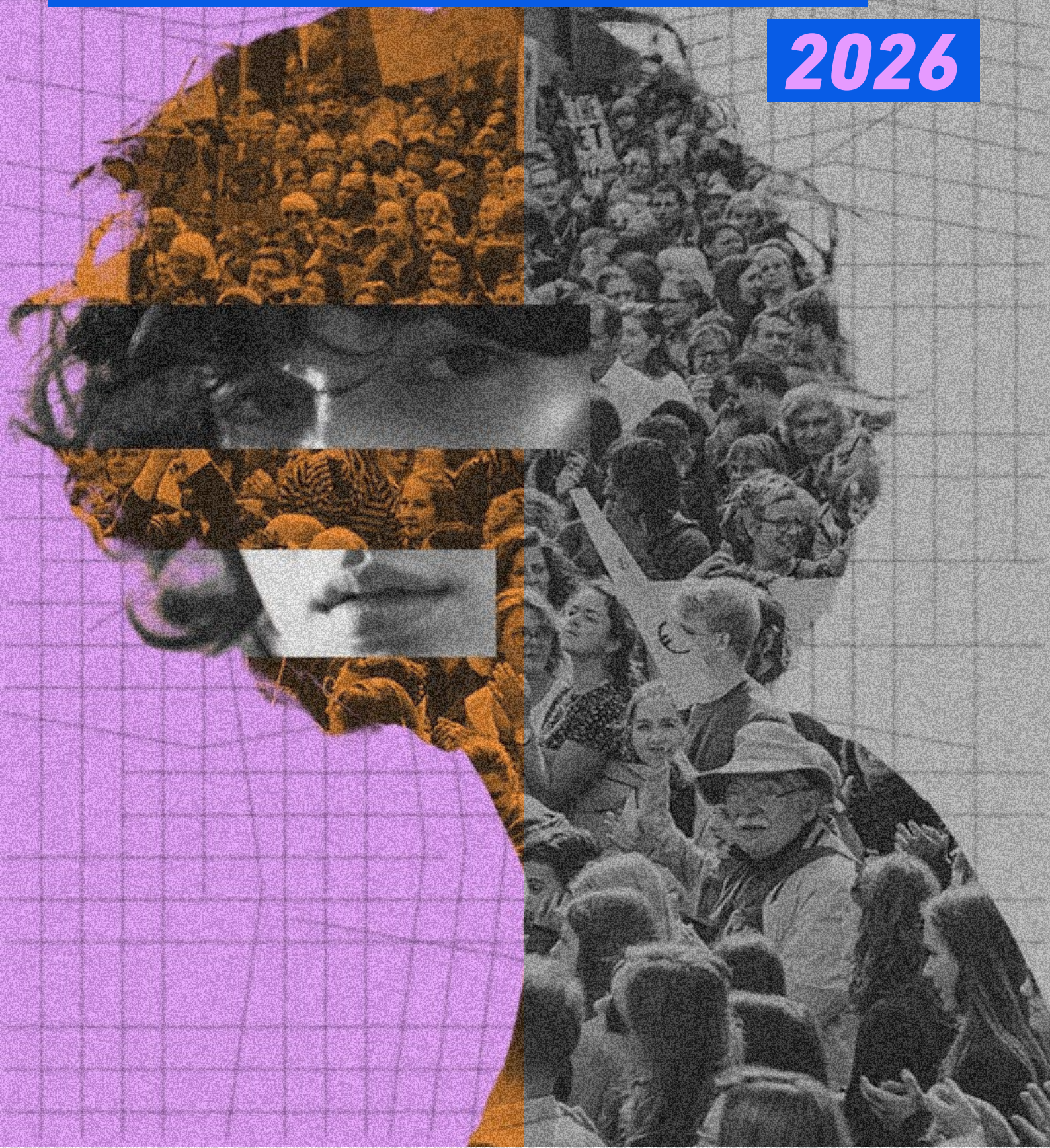


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Executive summary

Now in its seventh year, the European Commission's annual Rule of Law Report is an important assessment of the state of the rule of law across the Union. This was the second Report under the new Commission and the leadership of Commissioner Michael McGrath, and the fifth to include recommendations. At a moment of profound instability and need for principled global leadership, this year's Report should serve as a compass, providing sufficient guidance and forewarning to Member States.

This Gap Analysis presents the third consecutive analysis by the Civil Liberties Union for Europe (Liberties) of the identified gaps between the Commission's reporting and the on-the-ground assessment of national civil society organisations. It draws on the annual Liberties Rule of Law Report, published every spring since 2020, analyses the European Commission's data and is informed by contributions from Liberties' members. It is supported by three case studies: two country-specific studies, one joint study on Denmark and Sweden analysing how the Report functions as an early warning system and one on restoring the rule of law in Hungary. The thematic case study examines the intersection between artificial intelligence and the rule of law.

This year's Gap Analysis again points to a significant implementation gap and a failure to surface and address critical issues, whether at the national level or cross-cutting issues that impact the rule of law across the Union. Three key areas require further attention:

1. Continued implementation gap

The implementation gap remains persistent and significant: at least 96% of recommendations have not been fully implemented, and 54% show no or only limited progress. The lack of implementation means that 96% of the recommendations issued in 2026 were repeated from previous years, with most tracing back to 2022. Only seven new recommendations were introduced this year. Particularly concerning is the consistently large 'no progress' category, which has held steady at 29–34% of all recommendations year on year. That roughly a third of recommendations see no movement points to one of two explanations: either Member States lack the willingness to engage fully with the process, or the underlying issues have become so entrenched that progress is effectively impossible.

The Commission's overly optimistic assessment, noting that "nearly 1 in 2 (47%) of the recommendations made in 2025 have since been addressed by Member States – either fully or partially", disguises a wide range of partial implementation and fails to unpack why some problems remain so entrenched. This links to the long-term call of Liberties and other organisations for timelines and benchmarks, which would help break down larger problems and target specific issues on the ground. Without this

granular assessment and guidance, systemic issues remain in a spiral of non-implementation with no clear direction and a failure to identify and address the underlying causes or blockages.

2. Inadequate preventive response

Linked to the above issues, the Report fails to surface the most critical issues with the scale and urgency they warrant. This shortfall is visible both in country-specific assessments and in cross-cutting thematic issues. The Denmark-Sweden case study highlights that while both countries remain near the top of global indexes measuring democracy and the rule of law, backsliding is evident, yet not sufficiently addressed in the recommendations. This is particularly prominent in the area of 'Checks and balances', where, without an imminent change of course, the opportunity for early intervention may be lost.

Similarly, the Reports have the potential to unpack cross-cutting issues and identify where new problems might be emerging across the region. For example, the risks posed by artificial intelligence and the threats to the rule of law. This year's Report provides only scant reference to artificial intelligence, yet it would be strategic to use the Reports to delve into specific issues and learn from the trends.

3. Fragmented toolbox

The EU's various rule of law instruments each serve a distinct purpose: infringement proceedings offer a more incisive response to specific breaches, while Article 7 is designed to address more systemic threats. What is missing is an overarching framework that ties these instruments together. The Rule of Law Report has the potential to provide that comprehensive overview, but risks instead becoming a 'leftover tool' — one that only picks up issues if unaddressed by the EU's other mechanisms. As things stand, it fails to offer a comprehensive picture of the problems at hand nor a clear pathway to recovery, as illustrated by the case study on Hungary. The decision to remove recommendations related to the European Media Freedom Act (EMFA) provides a stark example; while enforcement under the EMFA has greater teeth, only one infringement proceeding has been launched to date, despite widespread failures to adequately implement the Act.

The [plan](#) to link the Rule of Law Report recommendations to National and Regional Partnership Plans (NRPPs) under the new Multiannual Financial Framework (MFF) holds promise for great integration and potential implementation of recommendations. However, if there is no obligation to include the content of recommendations in the NRPPs, then the same issues of political will and stagnant implementation are likely to occur.¹

1 For a further elaboration of recommendations related to budget conditionality see the Liberties 2026 Rule of Law Report.

INTRODUCTION

European Commission Vice-President Henna Virkkunen unveiled the Commission's 2026 Rule of Law Report at a [press conference](#) on 17 July 2026 – yet again, a mid-summer Friday – by emphasising that “defending the rule of law is more than ever essential” given the rising threats of political polarisation and attacks on democratic values and institutions. Liberties could not agree more strongly with Vice-President Virkkunen, and considers the Rule of Law Report an important tool in safeguarding the rule of law, democracy, and fundamental rights in Europe.

In an effort to help the Commission further strengthen the Report and make it even more effective in identifying and addressing threats, Liberties, together with our members, produces this Gap Analysis annually. It aims to provide feedback on the process and formulation of the Commission's Rule of Law Report in the hope that it will continue to evolve and become even more effective as both an early warning mechanism and a roadmap for correcting rule of law violations. [The Liberties 2026 Gap Analysis is our fourth assessment of the Commission's Rule of Law Report](#) and examines the continued issues around the implementation of recommendations, identifies gaps between the Commission's findings and the situation in EU Member States, and provides recommendations to close those gaps.

The Commission continues to describe the rule of law situation across the EU in far more glowing terms than Liberties and its members report. Executive Vice-President Virkkunen cited “significant reforms completed or underway across all areas”. In reality, Liberties' members identified very few significant reforms in our 2026 Rule of Law Report, with significant issues persisting and a clear lack of structural reform to address serious, often entrenched threats to the rule of law.

The 2026 Report also continues to have critical shortcomings that could otherwise be extremely constructive and help national governments improve their implementation records. Despite repeated, long-standing calls by Liberties and other civil society organisations for well-defined benchmarks and clear timelines to accompany the recommendations, the 2026 edition does not include these elements. This makes it extremely difficult to get an accurate picture of the true state of play, as the lack of benchmarks obscures the real issues and thus where intervention is needed.

As Vice-President Virkkunen said, defending the rule of law is more important now than ever before. That is why we urge the Commission to implement much-needed changes to the current Rule of Law Report. To make recommendations more meaningful and the Report more valuable, recommendations must be accompanied by clear benchmarks, timelines, and a longer-term view of the process that considers the process not only an early warning mechanism but a roadmap for implementing changes to correct rule of law backsliding and bolster protections for core EU values.

The Liberties 2026 Gap Analysis is based on our own assessment of the Commission's Rule of Law Report 2026, with a particular focus on the recommendations and their follow-up. It draws on the findings of our own Liberties Rule of Law Report 2026, released earlier in the spring, as well as a more recent assessment from our network of member organisations across the EU following the publication of the Commission's Report in July 2026.² While our annual Rule of Law Report covers primarily the 22 Member States where Liberties works with a member or partner organisation, the statistical component of this Gap Analysis examines the Commission's recommendations across all 27 Member States. The research for this report was carried out between July and September 2026.

To provide greater depth and address emerging issues, this Gap Analysis features several case studies: one on the rule of law in Denmark and Sweden, an in-depth look at efforts by the new Hungarian government to correct the erosion of the rule of law there, and a discussion on the intersection of the rule of law and artificial intelligence.

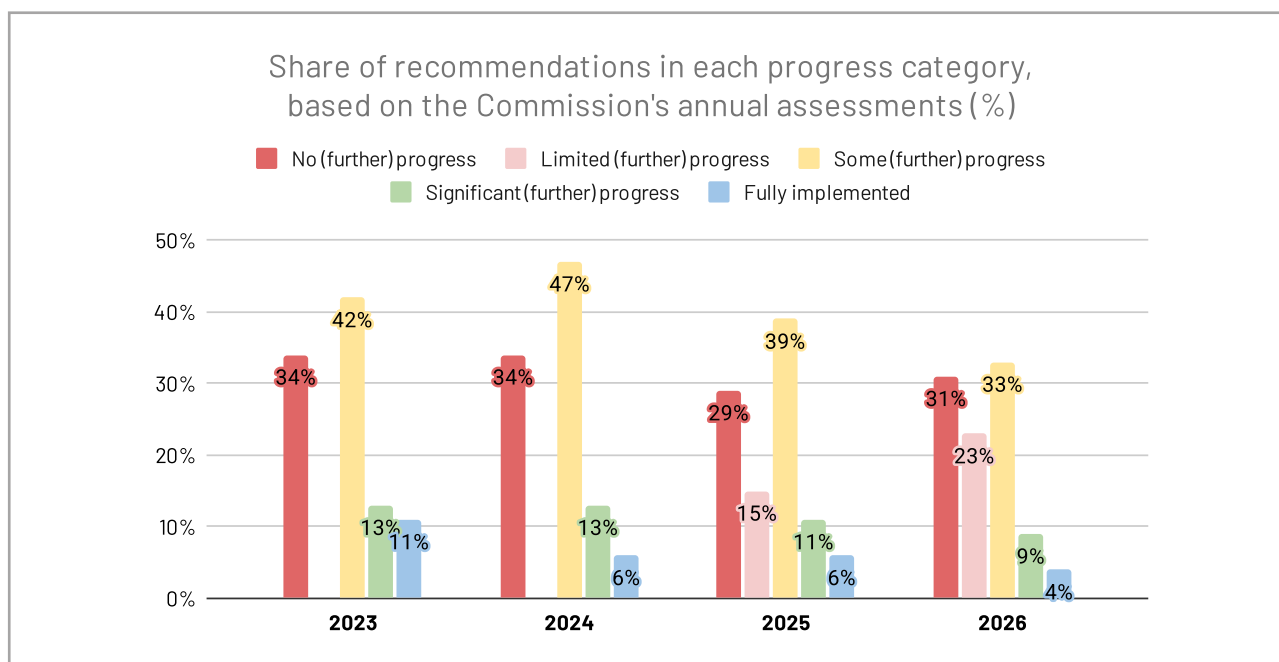
2 Liberties has members in Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, the Netherlands, Poland, Romania, Slovakia, Slovenia, Spain and Sweden.

THE COMMISSION'S 2026 RULE OF LAW REPORT: ASSESSING THE CHANGES AND REMAINING CHALLENGES

The growing implementation gap

At least 96% of the recommendations remain unimplemented. 54% show no or only limited progress, pointing to a persistent and significant implementation gap.

The growing implementation gap remains the primary concern for the effectiveness of the Commission's Rule of Law Report. **By 2026, more than half of the recommendations (54%) showed no or only limited progress.**³ The share of recommendations showing 'no (further) progress' remained



Full version of the table available in Annex, Table 1.

3 These and other figures presented further in this analysis count each separate Commission assessment of a recommendation or part thereof. Where a single bullet-point recommendation contains several elements and the Commission assigns different implementation statuses to those elements, each assessment is counted separately. As a result, the number of recommendations assessed for implementation may exceed the number of recommendations counted at bullet-point level. This approach provides a more precise picture of implementation progress, particularly for multi-part recommendations (see Liberties' 2025 Gap Analysis, section 'Multi-part recommendations'). For comparison, based on the Commission's assessments in the 2026 Rule of Law Report, if recommendations are counted only at bullet-point level, without separately counting the additional assessments of individual elements, 98% remain unimplemented: 29% show 'no (further) progress', 24% 'limited (further) progress', 35% 'some (further) progress', 10% 'significant (further) progress', and only 2% are assessed as 'fully implemented'.

relatively stable, fluctuating between 29% and 34% over the four years. Most concerning is the **steady decline in recommendations showing significant progress or reaching full implementation**. Their combined share fell from 24% in 2023 to 13% in 2026. The decline in full implementation is particularly notable, falling from 11% in 2023 to just 4% in 2026.

The fact that **very few recommendations have been fully implemented** points to a failure in follow-up and a lack of political will to actively address the issues raised. The Commission has explained the decline, noting that some earlier recommendations might have been relatively easy to address, leaving recommendations that cover more difficult, systemic issues. This might be partially true, but there is no supporting analysis, and even the highest levels of full implementation were only ever at a very low level of 11%.

A host of **inaction is obscured by broad categories** of 'some (further) progress' and 'limited (further) progress' accounting for 56% of all recommendations. Of great concern is the consistent bottom category where between 29-34% of recommendations remain stubbornly unimplemented. **The fact that there is no progress on approximately one-third of all recommendations** indicates either a lack of willingness to engage fully with the process or a level of entrenchment of issues that makes progress impossible, and recommendations are not sufficiently adapted to the conditions.

In all of these categories, the **lack of timelines and benchmarks** associated with the recommendations contributes to the problem of implementation and a limited understanding of where the issues and blockages lie. Clear timelines and benchmarks would help guide implementation and build a more complete understanding of the steps required.

Examples of persistent lack of progress due to insufficient political will

Germany: The 2026 Rule of Law Report finds that there has been 'no progress' made to reform the framework governing the tax-exempt status of non-profit organisations, a recommendation first issued in 2022 and consistently assessed as showing 'no progress'. The Report further indicates that, as of 2026, the German authorities have no intention of reforming this framework. Meanwhile, the existing tax-exempt status framework creates legal and financial uncertainty for civil society organisations (CSOs), in particular because of the uncertainty around the definition of 'political activity' and what type of activities might be considered permissible or not under the non-profit purpose. Furthermore, as the 2026 Rule of Law Report notes, certain political parties use deficiencies in the current system to their own advantage as a form of intimidation against CSOs, including by reporting them to the tax authorities for alleged political activity.

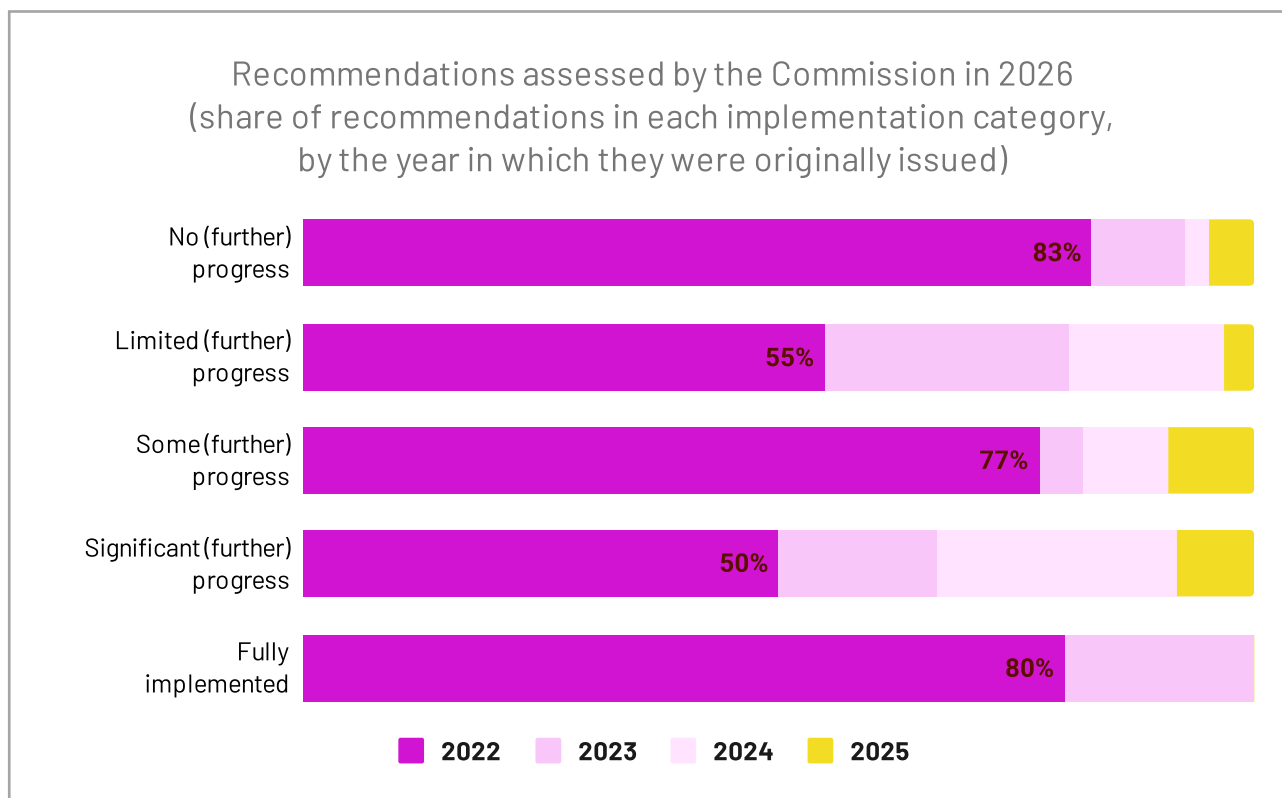
Belgium: The issue of non-implementation of judgments in Belgium remains a persistent problem. In 2024, the Commission recommended that Belgium take measures to ensure compliance by public authorities with final rulings of national courts and of the European Court of Human Rights. Yet the recommendation was assessed as showing only 'limited progress' in both 2025 and 2026. The issue remains particularly evident in the field of immigration and asylum, where tensions between the Government and the judiciary have repeatedly arisen over the implementation of court decisions. In 2026, despite the Constitutional Court suspending provisions allowing accommodation to be refused to certain applicants for international protection, the responsible Minister instructed the authorities to continue refusing accommodation on another legal basis. In this case, the failure to implement the Commission's recommendation appears to reflect not administrative or legal obstacles, but rather an unwillingness on the part of the executive to give effect to judicial decisions.

Repeated recommendations

96% of the recommendations issued in 2026 are repetitions from previous years, with 65% dating back to 2022.

A persistent lack of progress results in the continued repetition of recommendations. Of the recommendations issued in 2026, **96% repeat recommendations from previous years (up from 93% in 2025), with 65% dating back to 2022.** Though the share dating back to 2022 represents a slight decline compared with the previous year's Rule of Law Report, where 71% of recommendations were originally issued in 2022, the pattern remains notable, with low levels of full implementation resulting in most recommendations continuing to be simply repeated year on year.

While recommendations issued in 2022 make up the largest share across all implementation categories, their particularly high representation among recommendations assessed by the Commission showing 'no (further) progress' in 2026 is concerning: 83% of the recommendations in this category were originally issued in 2022. Similarly, 55% of the recommendations showing 'limited (further) progress' in 2026 date back to 2022.



Full version of the table available in Annex, Table 2.

Overall, a **significant number of recommendations issued four years ago remain stalled or have made only limited progress**. This links back to the observation above that the recommendations are a limited tool when addressing systemic issues.

New recommendations

Only seven new recommendations were introduced in 2026.

The seven new recommendations in 2026 mirror a similar pattern in previous years. In 2025, there were nine new recommendations. New or emerging issues are often overlooked as existing recommendations remain unimplemented and thus repeated. However, this defeats one of the key objectives of the Report: to act as a catalyst for reforms and identify and address early warning signs. If new issues are not being adequately picked up and translated into useful recommendations, it is more or less impossible to effectively tackle issues at an early stage, as discussed further in the case study on what Denmark and Sweden reveal about the Rule of Law Report as a preventive tool.

Overall, a consistent pattern emerges from the Commission's 2026 assessment. Just over half of the Member States⁴ had at least one recommendation assessed as showing 'no (further) progress'. Nine Member States (Austria, Bulgaria, Denmark, Finland, Germany, Italy, Malta, Slovakia, Sweden) had at least half of their recommendations show persistent failures⁵ in 2025-2026. Furthermore, five out of these nine Member States (Austria, Denmark, Germany, Malta, Slovakia) also had at least one recommendation showing persistent failure throughout four years (2023-2026).

Only three of the 27 Member States (Croatia, France, Luxembourg) showed a more positive picture in the Commission's 2026 progress assessment, as their recommendations were assessed as demonstrating 'some (further) progress' and/or 'significant (further) progress', with none assessed as showing 'no (further) progress' or "limited (further) progress".

Taken together, the persistent implementation gap, the accumulation of long-standing recommendations showing no or only limited progress, and the evidence of weak political will in several Member States reinforce the 2025 Gap Analysis recommendation that repeated non-implementation should trigger concrete consequences. The Commission should therefore establish clear escalation criteria and link persistent non-implementation more directly to existing enforcement tools, including infringement proceedings and budget conditionality.

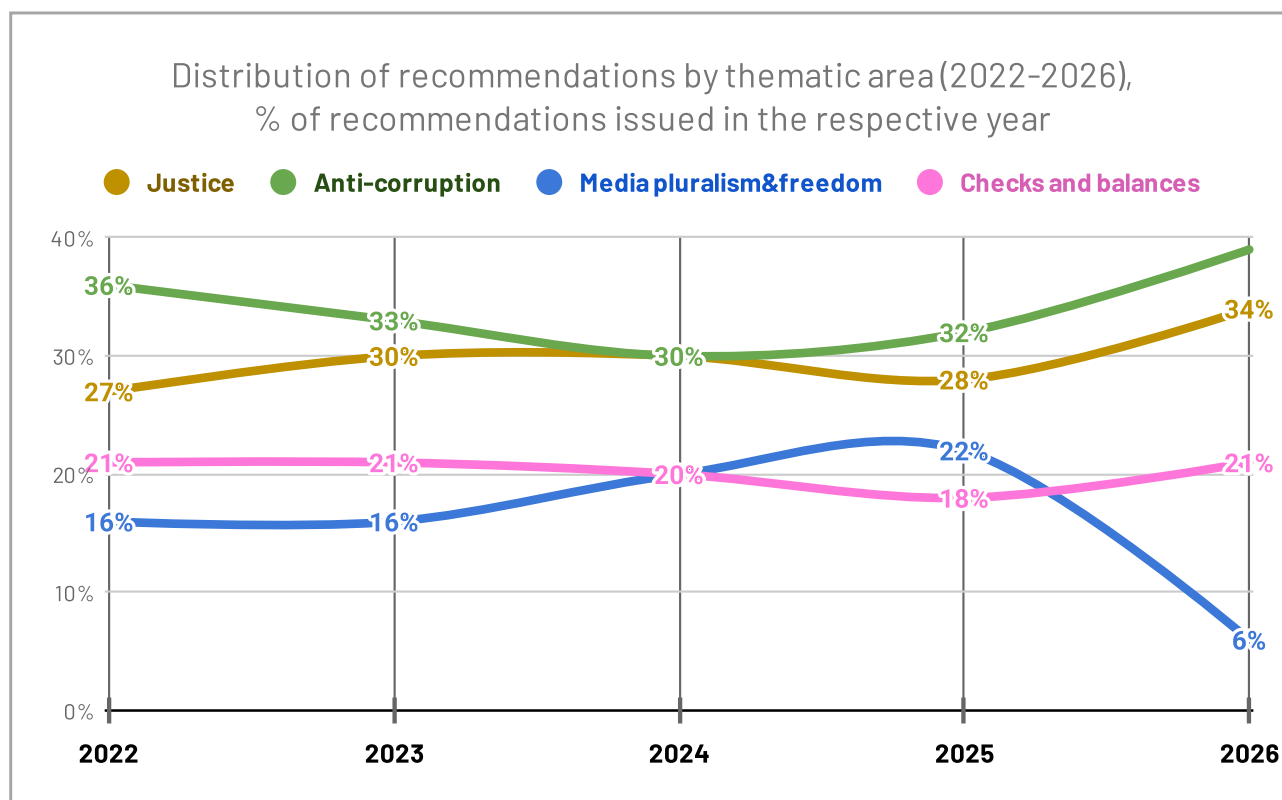
Observations across the four pillars of the Rule of Law Report

The distribution of recommendations across the four thematic pillars of the Rule of Law Report remained largely the same. Recommendations on 'Checks and Balances' account for 21% of all recommendations in 2026, broadly in line with the 2022-2025 average of 20%. 'Justice system' and 'Anti-corruption framework' pillars experienced a slight increase, with a combined share of 73% of all 2026 recommendations, compared with 60-63% in previous years.

The share of recommendations on 'Media freedom and pluralism' declined significantly, now accounting for only 6% of all recommendations, compared with 16-22% in previous years.

4 Austria, Belgium, Bulgaria, Czechia, Denmark, Germany, Hungary, Italy, Malta, Poland, Portugal, Romania, Slovakia, Sweden.

5 Persistent failure is defined here as the same recommendation or underlying reform area being assessed as showing 'no (further) progress' or 'limited (further) progress'.



Full version of the table available in Annex, Table 3.

The continued low level of recommendations in the ‘Checks and Balances’ pillar has been an ongoing concern for Liberties. Over the years, members identified the greatest and most consistent decline in this area, and yet it continues to receive the lowest number of recommendations from the European Commission. Once again, no recommendations related to the widespread restrictions on the right to peaceful protest. As set out in our 2026 Rule of Law Report, the area of ‘Checks and Balances’ covering issues including the rights to the freedoms of expression, association and assembly, and the independence and operation of independent oversight institutions, is often where many of the early warning issues arise. Violations in this area often go unchecked, opening the space for more systemic violations.

The removal of the EMFA recommendations

An area of particular note in the 2026 Rule of Law Report is the steep decline in recommendations related to media freedom. This was explained by the European Commission as being due to the removal of recommendations covered by the European Media Freedom Act (EMFA), most of whose provisions became applicable on 8 August 2025. Consequently, **the share of recommendations on ‘Media freedom and pluralism’ declined significantly, now accounting for only 6% of all recommendations**, compared with 16-22% in previous years.

Although the Executive Vice-President of the European Commission, Henna Virkkunen, indicated during the [press conference](#) on the 2026 Rule of Law Report on 17 July 2026 that the Commission is committed to strengthening the media pillar of the Rule of Law Report and that the EMFA recommendations will continue to be monitored, a closer look is needed to assess whether this move is indeed justified or whether it could weaken or blur the focus of the media pillar.

The rationale of the Commission is that the EMFA is now legally binding, requiring all member states to effectively implement its provisions. In the event of non-implementation, the ability of the Commission to launch infringement proceedings is, in theory, a stronger enforcement tool. This is a fair point, and the proper enforcement of the EMFA would indeed address core issues of media freedom, some of which were previously addressed through recommendations in the Rule of Law Report. However, it is unclear, at this stage, whether removing these recommendations best serves the defence of media freedom and pluralism.

While the EMFA may be the strongest enforcement tool and basis for infringement procedures that would address threats to media freedom, the Commission's reticence towards launching infringement procedures undercuts this as a point of justification. To date, there has been only one infringement procedure launched under the EMFA, against Hungary in December 2025. This is despite the fact that Liberties' members across the EU have identified myriad threats that clearly violate the EMFA. For example, members in Bulgaria, Croatia and Spain note continued political interference in public service media (PSM); our Italian member warns that both political influence over PSM and a funding model that "does not comply with EMFA requirements for adequate, sustainable, predictable and multiannual financial resources"⁶ remained unchanged in 2025. In Croatia, Italy, Malta and Romania, among others, members report continued opaque media ownership structures, often with no legislative steps planned to address the issues.

In Slovakia, actions by the government appear to be deepening existing EMFA violations rather than constructively addressing them. It was [reported](#) earlier in 2026 that the Commission is in a pre-infringement dialogue with Slovakia on the EMFA. While this has not progressed to a formal infringement procedure, it is unclear why echoing the pre-infringement discussions through rule of law recommendations would be detrimental. By contrast, it would increase transparency and ensure coherence in the analysis and messaging.

With the EMFA recommendations removed, what remains are scattered recommendations that don't fall squarely under any EU law, such as purely domestic SLAPP cases or journalists' access to

6 Civil Liberties Union for Europe, Liberties Media Freedom Report 2026, pp. 24-25, April 2026, <https://www.liberties.eu/f/fzija7>

documents. This starkens the contrast between the media pillar and the other three areas, and also brings into question why the binding nature of the EMFA is being used as a justification for removing relevant recommendations, while other binding laws, regulations and treaties are not similarly employed in the other pillars.

Changes in the treatment and assessment of recommendations

Many of the general patterns and trends identified in the Liberties [2025 Gap Analysis](#) remain relevant in the 2026 Rule of Law Report, from imprecise recommendations and poor implementation.

At the same time, some changes can be observed in the 2026 Rule of Law Report. One of these changes concerns the Commission's presentation of the follow-up to previous recommendations. Recommendations that are not renewed are now presented separately, including a new category of issues that remain under 'monitoring'. While this mostly concerns recommendations now covered by the EMFA, other issues have also been moved to monitoring. Some of these cases appear to require no further action, yet in others there are still steps for the Member State to take - and in that case it should remain an unimplemented recommendation with the requisite follow-up in place.

This raises questions about the criteria for moving an issue to monitoring rather than renewing the recommendation. More fundamentally, it raises questions about what monitoring means in practice: does the Commission consider a recommendation no longer necessary even where implementation is incomplete, and if so, how will further progress be encouraged and assessed? By moving such issues outside the main block of active recommendations, it may become less clear whether they remain a priority, and what further action may also reduce their visibility and make the follow-up process less clear. Overall, it is not clear why this category has been created, as it seems to introduce a new level of ambiguity.

Another change concerns the way progress assessments and recommendations are presented. In the 2026 Rule of Law Report, the assessment of progress and the corresponding recommendation are now brought together in a single entry, rather than in separate sections as in previous Reports, with a more detailed explanation of the reasoning underlying the recommendation and, in some cases, a clearer indication of what action is expected.

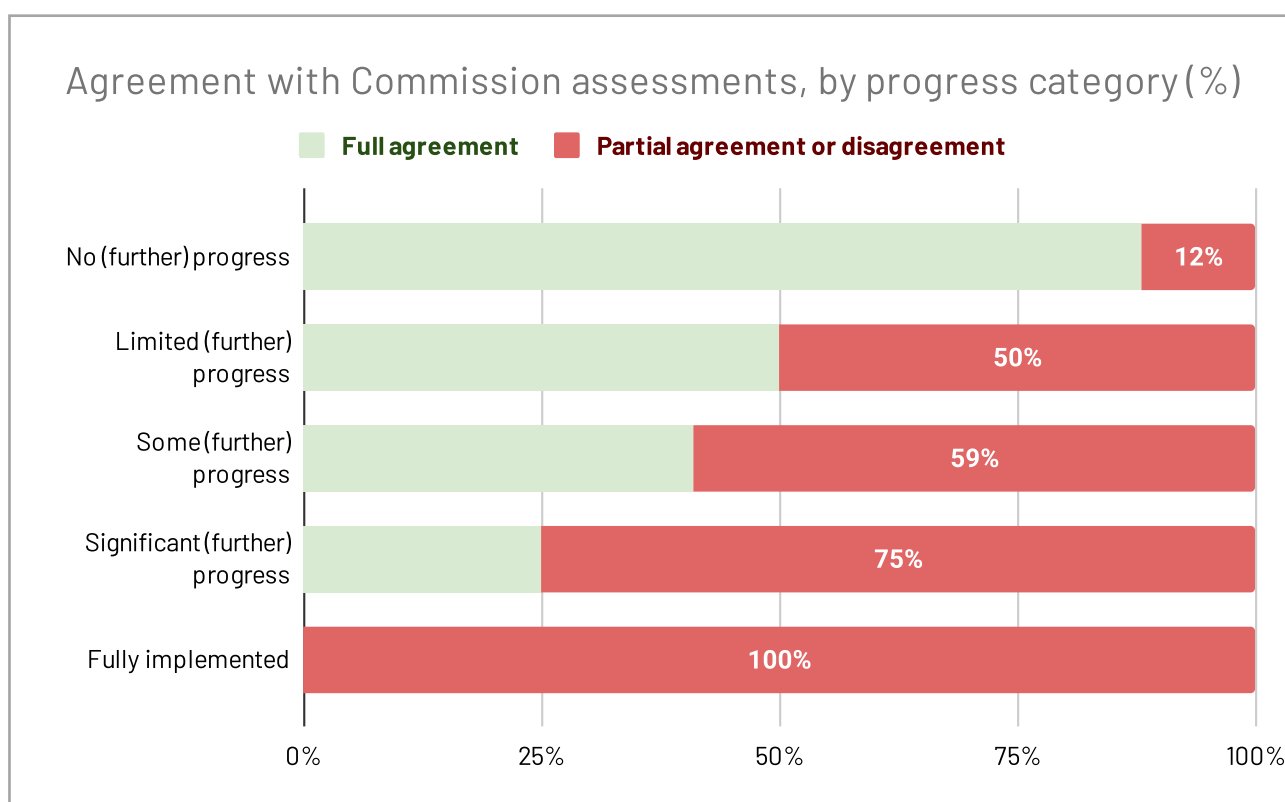
Example of the change: Belgium	
2025 Rule of Law Report	2026 Rule of Law Report
<u>Assessment of progress:</u> Some further progress on efforts to strengthen the framework for access to official documents, in particular by improving request and appeal processes, taking into account European standards on access to official documents. <u>Recommendation:</u> Further continue efforts to strengthen the framework for access to official documents, in particular by improving request and appeal processes, taking into account European standards on access to official documents.	No further progress has been made on strengthening the framework for access to official documents, in particular by improving request and appeal processes, with relevant draft legislation still pending adoption and part of the existing legislative framework still awaiting implementation. It is thus recommended to Belgium to <i>continue efforts to strengthen the framework for access to official documents, in particular by improving request and appeal processes, by completing the legislative reform on this matter, taking into account European standards on access to official documents.</i>

This represents a welcome effort to improve the clarity of recommendations, given the concerns highlighted in the 2025 Gap Analysis about recommendations being too broad or vague, sometimes repetitive, and lacking sufficient detail to make clear what action is expected. However, while these changes can make recommendations a little bit more specific, they do not fully reflect the more ‘SMART’ approach⁷ proposed in the 2025 Gap Analysis, which called for recommendations to be clear, precise and measurable, with a clear indication of the timeline for action. While there may be some variation in the approach to implementing a particular recommendation, greater clarity around the benchmarks and timeline would make it easier to assess whether government actions have led to meaningful progress.

Furthermore, while the more detailed reasoning provided for the assessment of progress may give greater context, it does not address the broader question of how the Commission decides on the level of progress. The issue related to the Commission’s approach to assessing progress was also highlighted in the 2025 Gap Analysis, which found that the grading system is broad, unclear and non-transparent, making it difficult to understand how the different categories are applied and whether they accurately reflect the extent of progress made.

⁷ Recommendations that are Specific, Measurable, Achievable, Relevant and Timebound.

Indeed, feedback from many of Liberties' members and partner organisations⁸ shows that the progress made on a given issue may be open to subjective assessment, leading to different views of the level of progress achieved. Participating Liberties' members and partners did not fully agree with the Commission on 43% of the recommendations assessed, and in 90% of those cases, they assessed progress less favourably. Commission assessments indicating progress were more frequently challenged: 50-75% of recommendations assessed as showing limited, some or significant progress did not receive full agreement, compared with 12% of recommendations assessed as showing no progress.



Full version of the table available in Annex, Table 7.

Furthermore, the Commission's assessment of recommendations as 'fully implemented' was challenged by the relevant member organisations as premature: 1) in Hungary, Liberties' member, the Hungarian Civil Liberties Union (HCLU), pointed out that the formal adoption of legislation reforming the

⁸ The submissions provide assessments by 14 Liberties member and partner organisations of progress in implementing the Commission's recommendations in Belgium, Bulgaria, Croatia, Czechia, Denmark, France, Greece, Hungary, Italy, Lithuania, Malta, the Netherlands, Slovakia and Sweden. The findings are limited to these 14 countries and are not representative of all 27 EU Member States. More detailed statistics are provided in Tables 4-7 of the Annex.

asset declaration system did not itself demonstrate that the new oversight and enforcement mechanisms were effective in practice; 2) in Bulgaria, Liberties' member, the Bulgarian Helsinki Committee (BHC), noted that the reform of the Inspectorate to the Supreme Judicial Council did not eliminate the risk of political influence, as the final decision on appointments remained with Parliament.

The assessment of recommendations for Greece points to a similar issue. The Commission found only 'limited progress' towards establishing a robust track record of prosecutions and final judgments in corruption cases, while the contribution on Greece argued that this focus on outcomes did not fully capture the underlying institutional constraints. The OPEKEPE affair, concerning alleged systematic fraud in the allocation of EU agricultural subsidies, illustrates this concern: under Article 86 of the Constitution, evidence concerning former ministers had to be referred by the European Public Prosecutor's Office (EPPO) to the Greek authorities and handled through a parliamentary procedure rather than the ordinary prosecutorial route. This places a crucial decision on whether an investigation can proceed within a political institution in which the governing majority ordinarily predominates. From this perspective, the Commission should focus not only on the lack of results, but also on whether the system is capable of producing those results independently, consistently and without political interference.

Across the submissions, a **recurring concern was the gap between the formal adoption of legislation or other measures and their effective implementation.** The participating organisations frequently considered legislative changes, draft reforms and preparatory work insufficient without evidence of effective enforcement or tangible results. They also identified concerns relating to resources, oversight, institutional independence, implementation delays and incomplete reforms.

Taken together, these findings reinforce Liberties' call for the Commission to make its assessment methodology and the criteria distinguishing the different progress categories more transparent, consistent and objective.

CASE STUDY: AI AS AN EMERGING RULE OF LAW CHALLENGE

Artificial intelligence has serious implications for the rule of law, democracy, and fundamental rights in Europe. While the EU has stood out as a global leader in regulating AI through the Artificial Intelligence Act, the recent Digital Omnibus – a process that itself may undermine democracy and the rule of law – brings into question how effective it will be in protecting fundamental rights. Liberties would like to see the annual Rule of Law Report used to flag instances where AI could threaten core EU values, something the Commission has thus far largely refrained from: there is a single, passive reference to the ‘AI era’ in the official Communication of the 2026 Report, and a single reference to AI in the Country Abstracts (regarding the introduction of an AI assistant in court settings in Estonia).

Shortcomings of the AI Act and risk categories

Liberties urges the Commission to use the Report to address AI-related issues in part because of how the Act is structured. As we noted in our recent paper on the Guidelines for high-risk AI,⁹ the classification system for determining if AI is high-risk relies on the system’s ‘intended purpose’ – what the provider says the system is designed to do. Therefore, at least initially, it is the provider who decides whether their own system is high-risk or not, through this self-assessment based on the system’s ‘intended purpose’. Providers may state an ‘intended purpose’ that does not properly capture the functional capability of an AI system and bring to market a system that directly impacts the application of justice, law enforcement, or democratic processes, without the oversight and transparency requirements it should be subject to.

There is also concern that the use of AI systems that are decidedly not high-risk under the AI Act – machine translation tools, summarisation tools, chatbots – in court settings could potentially pose great risk to the rule of law, access to justice and fundamental rights. Such use cases may not be subject to close oversight by the AI Office, the EDPS, or national regulators – the bodies tasked with enforcing the AI Act – because they are not classified as high-risk AI, but that does not mean they are free of bias, the risk of the black box, or hallucinations. When such uses are flagged to the Commission during the annual rule of law reporting process, it is important that they be included in the Commission’s Report, raising understanding and scrutiny, and perhaps helping to identify critical regulatory gaps.

9 Civil Liberties Union for Europe, Closing the High-Risk Regulatory Gaps: Strengthening Classification and Fundamental Rights Protections under the EU AI Act, September 2026: <https://www.liberties.eu/f/jf5mmh>

AI directly influences the democratic process

AI chatbots, like ChatGPT or Gemini, are increasingly being used by voters to solicit information about political candidates and advice on whom to vote for. An investigation by Liberties¹⁰ found that voters who used chatbots in the run-up to the 2026 Hungarian parliamentary elections were given inaccurate or heavily curated information. The systems routinely failed to identify the closest-matching party for a voter's given policy preferences, produced markedly inconsistent answers to identical prompts, and showed a clear bias towards identifying the ruling Fidesz party as a voter's best match, while the opposition Tisza party – which won in a landslide – was hardly suggested by comparison.

The rule of law implications of this are straightforward, but the EU's ability to effectively regulate this form of use has only very recently begun to come into focus. The EU AI Act requires providers of general-purpose AI (GPAI) models that pose systemic risk, including chatbots like ChatGPT and Gemini, to assess and mitigate potential risks and possible harms to democratic processes. Furthermore, the Digital Services Act requires very large online platforms (VLOPs) and very large online search engines (VLOSEs) to assess systemic risks affecting public debate and election integrity. This August, the Commission, in line with Liberties' recommendation, designated ChatGPT a VLOSE.¹¹ While this step is laudable, it does not close the regulatory gap: many other, similar GPAIs that can and do provide election information and voting advice continue to skirt these obligations, and the Commission's move falls short of regulating all GPAIs capable of these functions.

While the Commission has justified removing most media recommendations because of the EMFA, we hope they do not choose to omit AI-related issues – or recommendations – simply because legal compliance is mandated by the AI Act, the DSA, or other EU legislation. This is particularly important for the upcoming 2027 Report, as the high-risk requirements of the AI Act have been delayed until at least December of next year because of the Digital Omnibus. Beyond this, the extensive use of AI and its rapid evolution make constant oversight necessary, and the Commission should be prepared to use its Rule of Law Report to flag important issues related to AI.

10 Civil Liberties Union for Europe, Should AI Tell You Who to Vote For? Testing Political Advice in General-Purpose AI Systems During the 2026 Hungarian Election Campaign, 21 July 2026: <https://www.liberties.eu/f/uz6rz9>

11 European Commission, Commission designates ChatGPT, Reddit, Roblox under Digital Services Act, 31 August 2026 <https://digital-strategy.ec.europa.eu/en/news/commission-designates-chatgpt-reddit-roblox-under-digital-services-act>

CASE STUDY: WHAT DENMARK AND SWEDEN REVEAL ABOUT THE RULE OF LAW REPORT AS A PREVENTIVE TOOL

The case study on Denmark and Sweden is based on contributions from Liberties' members: Nyt Europa (New Europe) and Civil Rights Defenders.

Denmark and Sweden are generally considered countries with strong democracies and open civic space.¹² However, this reputation can obscure emerging developments that gradually erode the rule of law without causing an immediate or visible breakdown of formal institutions. Indeed, the 2026 Liberties' Rule of Law Report identifies warning signs of declining rule of law conditions in certain areas, categorising both Denmark and Sweden as 'sliders'. The main concern is that **the Commission's Rule of Law Report appears to place too much weight on the countries' traditionally strong reputations and, as a result, does not fully capture emerging challenges and early signs of gradual erosion.**

Denmark and Sweden each received four recommendations in 2022 and are left with only three in 2026. Over these four years, the Commission's recommendations for both countries focused primarily on justice and anti-corruption, despite significant developments concerning civic space, media freedom, public participation and other issues. This points to a broader problem: the Commission either overlooks emerging issues in the country chapters or documents them without clearly assessing their rule of law implications or issuing recommendations that call for the necessary reforms or government action.

In the 2026 Rule of Law Report's chapter on Denmark, the **gap is particularly visible in the area of checks and balances.** The Commission acknowledges concerns about the public consultation process, noting that 24 of the 175 consultations held during the reporting period were shorter than the recommended four-week period, limiting civil society's ability to influence the direction of legislative proposals. The Report further notes that Denmark falls below the EU average on stakeholder engagement. This is particularly important because the Danish public consultation process is not based on detailed statutory procedural guarantees but relies primarily on administrative guidance, political accountability and a long-standing culture of dialogue between public authorities and organised interest groups, with no legal sanctions for failing to comply with the relevant guidelines. Despite identifying these potential weaknesses in Denmark's checks and balances, the Commission did not

12 In the V-Dem Liberal Democracy Index 2026, Denmark ranks 1st and Sweden 2nd. The CIVICUS Monitor rates civic space in both countries as 'open', with Denmark scoring 89/100 and Sweden 81/100.

issue a corresponding recommendation calling for legally binding safeguards or providing concrete guidance for reform.

In the 2026 Rule of Law Report's chapter on Sweden, the Commission acknowledges that the **accelerated pace of legislative preparation** creates challenges for public participation by making it difficult for civil society to monitor rapidly developing initiatives and provide meaningful input, which may affect the quality of legislation. The Commission also notes challenges in implementing the new framework governing the funding and operation of civil society organisations, which introduced a 'democracy condition' for state support to religious communities and grants from the General Inheritance Fund, with efforts underway to extend an equivalent condition to other civil society funding schemes. Nevertheless, neither the concerns about public participation nor those relating to civil society funding resulted in a recommendation.

Furthermore, the Commission's chapters on Denmark and Sweden do not address **broader concerns about growing restrictions on freedom of assembly and expression**. These include police intervention in peaceful protests and increasingly hostile political rhetoric towards environmental defenders, climate activists and non-governmental organisations, including portrayals of peaceful protesters as a threat to democracy. The significance of these developments was emphasised in March 2026, when the [UN Special Rapporteur on the Situation of Human Rights Defenders](#) expressed concern about the reported deterioration of the situation of human rights defenders in Sweden. These concerns were reinforced in September 2026 by the [Swedish Institute for Human Rights](#), which found that human rights defenders face threats, silencing and financial pressures. In May 2026, the [Council of International Non-Governmental Organisations \(CINGO\) of the Council of Europe](#) conducted a country visit to Denmark, where it also raised concerns about emerging pressures on civic space, including increased hostility towards civil society actors. Additionally, in Sweden, the broader pattern of **increasingly restrictive security and criminal law measures** identified by civil society includes the reported use of minor 'civil disobedience' charges to detain and deport non-citizens on national security grounds, expanded surveillance, and fast-track criminal measures that risk creating legal uncertainty and disproportionate enforcement. As none of the above-mentioned concerns were addressed in the Report, they also did not result in corresponding recommendations.

The **Danish and Swedish cases also reveal deficiencies in the Commission's approach to formulating and assessing recommendations**. In Denmark, the Commission assessed 'limited progress' on the legal aid system because the Judicial Council continued its review, even though the review had not been completed, while repeating the recommendation on lobbying and revolving doors despite acknowledging that the government has no plans to introduce such rules. Wording such as 'step up efforts', used in relation to both the review of the legal aid system and the reform of the Access to Public Administrative Documents Act, sets neither a deadline nor a measurable outcome, allowing an unfinished process to be presented as progress. In Sweden, civil society actors questioned why

the recommendation concerning lay judges continues to be repeated when the proposed measures can only be implemented after the parliamentary election held on 13 September 2026. In this case, the delay results from a legally binding timeframe rather than government unwillingness, but this distinction is not reflected in the Commission's assessment.

Designed as a preventive tool, the Rule of Law Report should respond when warning signs first emerge, particularly in countries whose strong democratic reputations may conceal gradual erosion. The Danish and Swedish cases show that the Commission fails to mention issues repeatedly reported by civil society or records problematic developments without clearly assessing their rule of law implications or translating them into targeted recommendations. By the time concerns become systematic, the opportunity for early intervention may have been lost.

CASE STUDY: THE COMMISSION REPORT'S ROLE IN RESTORING THE RULE OF LAW IN HUNGARY

The case study on Hungary is based on contributions from Liberties' member, the Hungarian Civil Liberties Union (HCLU).

The defeat of Viktor Orbán and Fidesz's 16 years of continuous rule in the April 2026 parliamentary elections provided a unique opportunity for a renewal of a democracy which had been severely eroded by the authoritarian state practices under the Fidesz government. It also set a challenging task, coupled with high expectations from both Hungarian citizens and EU institutions, for the new Tisza government to restore the rule of law in Hungary. Following Tisza's political promises, the new government has, during its first five months in office, introduced several reforms, including ending the state of emergency, abolishing the controversial Sovereignty Protection Office (SPO), and beginning to reform the public media. The renewed political will was also reflected in the status of the recommendations assessed by the Commission as part of the 2026 Rule of Law Report: the status of three recommendations concerning the media and civil society organisations changed from years of 'no progress' to 'some progress', while one anti-corruption recommendation was marked as partially implemented following the adoption of legislation on asset declarations. This is a stark change, as previously Hungary had the highest number of resolutely unimplemented recommendations, with 6 recommendations showing 'no progress' for four years in a row.

However, the transition back to democracy (the so-called 'democratic U-turn') is a challenging process, especially in situations when the rule of law "cannot be achieved without the violation of formal legality" (i.e. where restoring the rule of law may require breaking or changing laws adopted under the previous government). In the case of Hungary, the process of reforming institutions shaped by 16 years of political entrenchment creates problems of its own: long mandates and appointments made under

the previous system cannot simply be wished away. Replacing politically captured institutions also carries the risk that control merely passes to the new governing majority, while the creation of entirely new institutions, sometimes with considerable powers, requires scrutiny of their independence and institutional safeguards from the outset. For these reasons, transnational standards of democracy, the rule of law and human rights are important as a reference point for determining whether changes to the domestic legal order constitute a further erosion of the rule of law or contribute to its restoration. In the case of the EU, such standards are primarily established in the EU Treaties, the Charter of Fundamental Rights, and EU Regulations and Directives. For a government committed to restoring the rule of law, however, these standards need to be translated into concrete reforms of the national legal system.

The EU's Rule of Law toolbox largely evolved in response to the long-term degradation of the rule of law in Hungary and Poland and the recognition that existing instruments were insufficient. The Article 7 Process, seen as the 'nuclear' option, resulted in years of dialogue but no recommendations or concrete action, and legal cases, whilst hugely significant, failed to address the systemic nature of the problems. This led to the development and deployment of several key instruments including:

- The Commission's Rule of Law Report, launched in 2020 and designed to provide a more comprehensive approach covering all Member States and a broad range of rule of law issues. The aim was to track and assess developments and ensure a more preventive approach.
- The Rule of law conditionality regulation, applicable since January 2021, is based on Article 322(1) TFEU and was designed to protect the EU budget from risks arising from breaches of the rule of law. It has so far been applied only to Hungary: the Commission initiated the procedure in April 2022, and in December 2022 the Council suspended part of the EU funding because Hungary had not sufficiently addressed the identified rule of law concerns.
- The Recovery and Resilience Facility (RRF) was introduced in February 2021 as a temporary EU funding instrument to support Member States' recovery from the COVID-19 pandemic. Although its main purpose is economic recovery and investment, national recovery and resilience plans can also include rule of law reforms. Thus, in Hungary, 27 'super milestones' were agreed covering judicial independence, anti-corruption, and public procurement, and need to be complied with before funds are released.

Each of these instruments evolved under particular circumstances to address serious rule of law concerns, while remaining within the complexities and constraints of EU law. This resulted in a comprehensive, but somewhat scattered and complex toolbox that has made it difficult, over the years, to halt the rule of law decline - and equally poses a challenge for those now seeking to restore the rule

of law. The sum of all the required actions likely adds up to a comprehensive framework, but there is no clear, easy-to-use roadmap.

The Rule of Law Report was designed with a broad perspective in mind, and has the potential to provide a basis to develop guidance on restoring the rule of law. Furthermore, it is a permanently established instrument, unlike the Recovery and Resilience Facility, which, although it sets concrete and time-bound milestones for reforms, ends in December 2026. As a monitoring tool designed to identify and respond to trends, **is the Rule of Law Report flexible and targeted enough to serve as a roadmap for rule of law restoration?**

Liberties' analysis over the years indicates that certain structural issues stand in the way, but that the Rule of Law Reports should be able to respond and assist in exactly these circumstances. Civil society organisations have developed various [frameworks for analysis](#) - for example, of the 27 super milestones. The Hungarian experience provides a useful opportunity to consider where the Rule of Law Report could offer more structured and clearer guidance for democratic restoration.

1. As Hungary moves from rule of law backsliding to its restoration, some aspects of already identified rule of law problems may become more pressing, so the Rule of Law Report should reassess priorities and distinguish urgent reforms from those that can be addressed later.

The problems addressed by the recommendations from previous reporting cycles have not disappeared. Case allocation in the lower courts, judicial and prosecutorial pay, high-level corruption and restrictions on civil society are still unresolved.¹³ At the same time, the change of government has brought other questions higher on the agenda, and some of them fall outside the recommendations formulated before the transition. The issue is therefore not whether the existing recommendations remain relevant, but whether they still reflect the issues that now require the most attention.

The changes in judicial governance are a good example. For 2026, the Commission retained its recommendations on case allocation and remuneration.¹⁴ Meanwhile, the government has started to change some of the rules governing the judiciary itself. The Seventeenth Amendment to the Fundamental Law gives the judiciary a stronger role in the appointment and removal of the Presidents of the Kúria and the National Office for the Judiciary.¹⁵ These changes bring other aspects of judicial

13 European Commission, 2026 Rule of Law Report, Country Chapter on Hungary, Recommendations, p. 3.

14 Ibid., Recommendations concerning the transparency of case allocation systems in lower-instance courts and the remuneration of judges, prosecutors and judicial and prosecutorial staff.

15 Seventeenth Amendment to the Fundamental Law of Hungary, adopted 13 July 2026, Arts 3-4, amending Arts 25 and 26 of the Fundamental Law.

independence to the fore that are different from those covered by the existing two recommendations. The authorities have to deal with institutions and senior office-holders inherited from a system in which political influence over judicial governance was a recurring concern. At the same time, the rules introduced to address that legacy have to protect the same institutions from political influence by the new majority. This means that questions about how appointments are made, what happens to existing mandates and where the limits of political intervention are drawn have become more urgent priorities for judicial independence.

The judicial example shows the broader challenge for the Rule of Law Report. Existing recommendations may continue to address genuine problems, while the restoration process makes other aspects of those problems more urgent and brings additional rule of law questions to the foreground.

2. As Hungary creates new institutions to address rule of law problems, the Rule of Law Report should also subject those new institutions to rule of law scrutiny: how they are designed and how they use their powers.

High-level corruption shows why additional scrutiny is needed. The Commission has long expected Hungary to show a consistent record of investigations, prosecutions and final judgments in such cases. The 2026 Rule of Law Report finds no progress on this recommendation, while acknowledging that some recent positive developments came too late to have produced results during the reporting period.¹⁶ In particular, the new government seeks to implement this recommendation by creating a new institution to deal with high-level corruption cases, adding another layer for the Rule of Law Report to assess. The Seventeenth Amendment laid the constitutional foundations for the new National Asset Recovery and Protection Office (NVVH), and detailed legislation on the Office was adopted in August.¹⁷ The creation of the NVVH means that the Commission's assessment can no longer focus only on whether Hungary produces better results in high-level corruption cases: the new Office must also be assessed from a rule of law perspective. Because it exercises substantial public powers, this assessment should also consider the limits on those powers, the safeguards for those affected by them, and the role of courts and other external controls.

16 European Commission, 2026 Rule of Law Report, Country Chapter on Hungary, section on high-level corruption and assessment of the corresponding recommendation. The Commission notes that no progress had been made in establishing a robust track record of investigations, prosecutions and final judgments.

17 Seventeenth Amendment to the Fundamental Law of Hungary, Art. 5, introducing Art. 42 of the Fundamental Law; Act XXXIV of 2026 on the National Asset Recovery and Protection Office, adopted in August 2026.

3. As Hungary moves forward with reforms, the Rule of Law Report should also assess how they work in practice and whether they actually address the problems previously identified.

Media governance illustrates why this matters particularly clearly. Previous Rule of Law Reports criticised the lack of independence of both the media regulator and public-service media, so the new government did not have to start by establishing what was wrong with the existing system.¹⁸

The Media Act adopted in June changed several of the rules governing the Media Council. Its President is now chosen through an open application procedure, professional organisations are represented on the nominating committee, and the parliamentary part of the selection is public.¹⁹ The first competition under the new rules was launched at the end of July.²⁰ With the new rules in place, the focus shifts from their formal adoption to how they operate in practice. An open competition does not in itself guarantee an independent regulator. This is particularly important in the current Hungarian context, where the governing parties continue to hold a two-thirds parliamentary majority and therefore face few political constraints in making appointments requiring a qualified majority. Much will depend on who takes part in the selection, how candidates are assessed and whether the procedure produces a leadership able to act independently of the governing majority. These are questions that can only really be answered as the new system starts operating.

This is why the Commission was right to treat the June reform as 'some progress' rather than a completed reform.²¹ The Report also identifies several of the safeguards that were missing from the previous system and that the new rules seek to introduce. What remains to be seen is whether those safeguards will make a difference in practice.

These are only some of the ways in which the Rule of Law Report could evolve to better support rule of law restoration and even the development of a Constitutional review process. The Report could also make a clearer link to other EU instruments and procedures relevant to the Member State, such as

18 See, most recently, European Commission, 2025 Rule of Law Report, Country Chapter on Hungary, SWD(2025) 917 final, and European Commission, 2026 Rule of Law Report, Country Chapter on Hungary, SWD(2026) 917 final.

19 Act XXI of 2026 amending Act CLXXXV of 2010 on Media Services and Mass Communication, s. 29, introducing new ss. 124-126 of Act CLXXXV of 2010.

20 National Media and Infocommunications Authority, Call for applications for the position of President of the Media Council, published 31 July 2026.

21 European Commission, 2026 Rule of Law Report, Country Chapter on Hungary, assessment of the 2025 recommendation on the functional independence of the media regulatory authority.

RRF milestones, the conditionality mechanism and relevant Court of Justice of the European Union (CJEU) judgements.

The Rule of Law Report in a restoration context:

Reassessing priorities:

- Setting priorities as some rule of law problems become more urgent during a democratic transition and new aspects of already identified problems require attention.

Scrutiny of new institutions:

- Assessing how new institutions are set up and how they use their powers, including whether those powers are properly limited, whether people affected by them have adequate safeguards, and whether courts or other bodies can provide effective oversight.

Progress in practice:

- Assessing whether reforms actually address the problems previously identified, by looking beyond the adoption of legislation to how new rules operate in practice.

ANNEX: FULL TABLES

Table 1

(Non)implementation of Commission recommendations, based on the Commission's Annual Rule of Law Reports (2023-2026) ²²					
	No (further) progress	Limited (further) progress	Some (further) progress	Significant (further) progress	Fully implemented
RoLR 2023 (165* recommendations assessed)	56 (34%)	-	69 (42%)	22 (13%)	18 (11%)
RoLR 2024 (158* recommendations assessed)	53 (34%)	-	75 (47%)	21 (13%)	9 (6%)
RoLR 2025 (150* recommendations assessed)	43 (29%)	22 (15%)	59 (39%)	17 (11%)	9 (6%)
RoLR 2026 (133* recommendations assessed)	41 (31%)	31 (23%)	44 (33%)	12 (9%)	5 (4%)

22 For a more accurate analysis of implementation, we count each separate Commission assessment of a recommendation or part thereof. Where a multi-part recommendation contains elements with different implementation statuses, each assessment is counted separately. As a result, the total number of recommendations assessed may exceed the number of bullet-point recommendations issued (see Liberties' 2025 Gap Analysis, section 'Multi-part recommendations').

Table 2

Recommendations assessed in 2026: implementation status by year of issuance, based on the Commission's Annual Rule of Law Reports (2023-2026)					
	issued in 2022	issued in 2023	issued in 2024	issued in 2025	Total
No (further) progress	34 (25%)	4 (3%)	1 (1%)	2 (1,5%)	41 (31%)
Limited (further) progress	17 (13%)	8 (6%)	5 (4%)	1 (1%)	31 (23%)
Some (further) progress	34 (25%)	2 (1,5%)	4 (3%)	4 (3%)	44 (33%)
Significant (further) progress	6 (4,5%)	2 (1,5%)	3 (2%)	1 (1%)	12 (9%)
Fully implemented	4 (3%)	1 (1%)	-	-	5 (4%)
Total	95 (71%)	17 (13%)	13 (10%)	8 (6%)	133* recs from 2025 RoLR, including multi-part recs

Table 3

Recommendations by thematic area, based on the Commission's Annual Rule of Law Reports (2022-2026)							
Thematic area	2022	2023	2024	2025	2026	Total	Average number per year
Justice system	40 (27%)	41 (30%)	41 (30%)	34 (28%)	37 (34%)	193	38,6 (30%)
Anti-corruption framework	52 (36%)	45 (33%)	41 (30%)	40 (32%)	42 (39%)	220	44 (34%)
Media pluralism and media freedom	23 (16%)	22 (16%)	28 (20%)	27 (22%)	7 (6%)	108	21,6 (16%)
Other institutional issues related to checks and balances	30 (21%)	29 (21%)	27 (20%)	22 (18%)	23 (21%)	130	26 (20%)
Total	145	137	137	123	109		

Table 4

Distribution of assessed recommendations by country, based on responses from 14 Liberties member and partner organisations		
Country	Number of recommendations	Share of all 68 recommendations across the 14 countries
Belgium	6	8.8%
Bulgaria	7	10.3%
Croatia	4	5.9%
Czech Republic	4	5.9%

Denmark	3	4.4%
France	3	4.4%
Greece	4	5.9%
Hungary	8	11.8%
Italy	6	8.8%
Lithuania	2	2.9%
Malta	7	10.3%
Netherlands	4	5.9%
Slovakia	7	10.3%
Sweden	3	4.4%

Table 5

Level of agreement with the Commission's 2026 assessment of progress, based on responses from 14 Liberties member and partner organisations		
Level of agreement	Number of recommendations	Share of all 68 recommendations across the 14 countries
Full agreement	39	57%
Partial agreement	16	24%
Disagreement	13	19%

Table 6

Direction of differences from the Commission's 2026 assessment of progress, based on responses from 14 Liberties member and partner organisations		
CSO assessment relative to the Commission's assessment	Number of recommendations	Share of the 29 recommendations for which the assessments differed
Less progress than assessed by the Commission	26	90%
More progress than assessed by the Commission	3	10%

Table 7

Agreement by the Commission progress category, based on responses from 14 Liberties member and partner organisations			
Commission assessment category	Number of recommendations	Share in full agreement	Share in partial agreement or disagreement
No (further) progress	26	88%	12%
Limited (further) progress	14	50%	50%
Some (further) progress	22	41%	59%
Significant (further) progress	4	25%	75%
Fully implemented	2	0%	100%

CONTACT

About

The Civil Liberties Union for Europe (Liberties) is a Berlin-based non-governmental organisation promoting and protecting civil liberties, human rights, and democracy across the European Union. With a presence in Brussels and a network of 24 member organisations across the EU, Liberties campaigns on issues including the rule of law, media freedom, SLAPPs, privacy, targeted political advertising, artificial intelligence, and mass surveillance. Unless otherwise indicated, the opinions expressed by Liberties do not necessarily represent the views of its member organisations.

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