Sixth Opinion on Croatia

Advisory Committee on the Framework Convention for the Protection of National Minorities

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SUMMARY

1. Croatia is strongly committed to supporting 22 recognised national minorities through a robust legal framework and targeted policies. This is evident in the increased funding for cultural autonomy, which supports minority associations and institutions in culture and education. Special bodies, like the Council for National Minorities, are tasked to play a crucial role in advancing these measures and facilitating the participation of national minority representatives in decision-making processes.

2. While efforts to support minority cultures are commendable, the Advisory Committee observes that many activities are largely focused on folkloristic expressions of minority identities, which may not sufficiently promote public awareness about the presence, the contribution to society, and specific needs and interests of persons affiliating with national minorities. Furthermore, the Advisory Committee is concerned that awareness of minority rights, as a core element of human rights, remains uneven across the country and with regards to different national minorities. In some regions, national minorities are recognised and consider themselves as an integral and equal part of society, whereas in others public discourse continues to be influenced by wartime narratives. These dynamics contribute to significant disparities in the enjoyment of minority rights in Croatia and for persons affiliating with different national minorities. Additional efforts are needed to highlight the contributions of minority communities and persons affiliating with them as an integral part of Croatian society. In this regard, the Advisory Committee also emphasises the key role of mainstream education and media in promoting and fostering mutual respect and intercultural dialogue.

Population census and data collection

3. Croatia's latest census in 2021 indicates a notable overall population decline, including a reduced proportion of persons affiliating with national minorities. Under the new Act on the Central Population Register, adopted in March 2025, a central population register will become the primary source of population data, including information on ethnic, linguistic and religious affiliations. The Advisory Committee is concerned that certain provisions of the new act may risk excluding individuals affiliating with national minorities. It therefore expects careful assessment of the new act's impact, proper consultations with representatives of all national minorities, and clear implementation guidelines ensuring compliance with international data protection standards and voluntary and free-self-identification. It also stresses that accurate and disaggregated equality data, including by gender and age, are essential for developing effective strategies to improve access to minority rights, enabling evidence-based policymaking and the measurement of progress.

Anti-discrimination legal and institutional framework

4. The anti-discrimination legal framework provides strong protection, supported by policy documents and the solid work of the ombudsperson's office, which continues to serve as a multi-mandated equality body and national human rights institution (NHRI) with a broad range of competences. Despite the credibility and public trust enjoyed by the institution – as reflected in the increasing compliance of public authorities with its recommendations – its effectiveness has been affected by delays in the parliamentary discussion and approval of its annual reports. These delays risk diminishing the relevance and impact of recommendations, many of which address the achievement of full and effective equality for persons affiliating with national minorities and may hinder their timely implementation.

Promotion of intercultural dialogue, mutual respect and understanding

5. The Advisory Committee regrets that despite comprehensive legal and policy safeguards for national minorities, along with a set of government efforts to promote mutual understanding, manifestations of intolerance and hostility persist. The Advisory Committee is particularly concerned about the use of symbols associated with and expressions of sympathy towards the fascist *Ustaša* regime during the Second World War, especially among young people, who are often unaware of their historical role and deeply offensive historical connotations. Ongoing instances of historical revisionism, the trivialisation of war crimes, and the public glorification of convicted war criminals are likewise alarming. These worrying patterns are further reflected in exclusionary rhetoric in public discourse, including by some politicians and public figures, targeting several groups, such as the Roma and the Serb national minority. Instances of hostility against persons affiliating with minorities occurred and these were publicly and unequivocally condemned by the authorities. Negative statements, especially when made by prominent political figures, and rooted in popular culture and sports, undermine intercultural dialogue and mutual respect between different communities and persons affiliating with them. Decisive measures need to be implemented to promote intercultural dialogue and foster a spirit of tolerance and mutual respect. Effectively combating all forms of discrimination, hate crime and hate speech is crucial to achieve this goal.

Language rights

6. While the Advisory Committee acknowledges Croatia's solid legal framework for supporting teaching in and of national minority languages, the existing threshold (33%) for their use in contacts with public authorities and in public signage remains excessively high and hinders the full enjoyment of language rights, particularly regarding the use of the Cyrillic script. In addition, the persistent shortage of qualified teachers and the fact that educational materials about Croatia's national minorities and persons affiliating with them remain insufficient further limit both the visibility of, and potential interest in, minority language education.

Effective participation in public affairs and decision-making processes

7. There is a significant underrepresentation of persons affiliating with national minorities in public administration. Although preferential treatment for the public employment of such persons is legally possible, its implementation needs to be strengthened. The current parliamentary system, with eight reserved seats for national minorities, is favourable for proportional representation, but does not fully address the diverse needs of all 22 minorities. Greater dialogue is needed to ensure equal representation of all minorities. Traditionally, the eight members of parliament representing national minorities have been considered natural partners of the government. Following the parliamentary elections held in 2024, representatives of the Serb national minority are no longer part of the government following a specific condition to this effect by a small coalition political party. Additionally, low turnout and limited political participation at the regional and local levels highlight the need for regular evaluations of support to minority councils and their representatives, to enhance their effective participation in decision-making.

Situation of persons belonging to the Roma minority

8. The Roma continue to face significant structural challenges across various areas of life, including limited access to quality education, high unemployment, substandard housing, health disparities and persistent discrimination in both the public and private spheres. The authorities have adopted various policy measures, such as the National Plan for Roma Inclusion (NRIP) for the Period 2021-2027 and the new Action Plan for Roma Inclusion 2026-2027, and provided increasing financial resources to implement them. However, the implementation of these measures is sometimes insufficient, resulting in only limited tangible improvements on the ground. The prevention and eradication of segregation of Roma pupils and students in education remains a systemic challenge across the country, and the Advisory Committee considers this a priority concern. Immediate and sustained action is needed to address these issues as well as to reduce early school leaving and ensure inclusive, quality education - particularly in areas where Roma are residentially segregated from the rest of the population. In socio-economically disadvantaged regions, stronger co-ordination between national and local policies is essential to provide lasting solutions to employment and housing challenges. Access to healthcare and social protection services remains subject to significant practical barriers, disproportionately affecting Roma women and children, whose needs and interests are often overlooked in mainstream policies. Addressing these complex challenges requires the development of robust, continuous, culturally-sensitive and gender-sensitive channels of communication between relevant agencies, professionals and representatives of Roma communities.

PRIORITY RECOMMENDATIONS

9. The Advisory Committee proposes that the Committee of Ministers make the following recommendations with respect to the implementation of the Framework Convention by Croatia.

10. The authorities should take the following priority measures to improve further the implementation of the Framework Convention, along with the implementation of all recommendations contained in this Opinion:

Priority recommendations

1) The Advisory Committee urges the authorities to intensify their efforts to promote a spirit of tolerance, intercultural dialogue, mutual respect and understanding among all persons living in Croatia, including the Serbs and the Roma (see paragraph 85, Article 6);

2) The Advisory Committee reiterates its recommendation included in the previous Opinions and again urges the authorities to lower substantially the minimum threshold (33%) for the equal official use of national minority languages and scripts in local self-government units, and to ensure that the relevant legal provisions are duly implemented by all local authorities and supported by effective mechanisms to ensure implementation. The authorities should promote the voluntary introduction of national minority languages into equal official use by local self-government units (see paragraph 111, Article 10);

3) The Advisory Committee calls on the authorities, in close co-operation with parents and Roma minority representatives including women, to take further steps to develop and implement measures to end school segregation, such as a comprehensive desegregation policy with clear targets, sufficient resources, precise timetables and a monitoring mechanism for its implementation (see paragraph 135, Article 12);

4) The Advisory Committee reiterates its recommendations included in its previous Opinions and calls on the authorities to adopt a pragmatic and flexible case-by-case approach in implementing minority rights, including economic and social ones, under the Framework Convention (see paragraph 22, Article 3);

5) The Advisory Committee calls on the authorities to remove, both in legislation and in practice, any barriers, including approval by the government, that contribute to the delays in the debate of the ombudsperson's annual reports, to examine these reports in a timely manner, and to ensure the effective implementation of the ombudsperson's recommendations (see paragraph 46, Article 4);

6) The Advisory Committee calls on the authorities to continue their efforts to ensure the effective implementation and monitoring of the National Plan for Roma Inclusion 2021-2027 at all levels as well as to strengthen co-ordination of its implementation through close co-operation with, and enhanced co-ordination among, all the relevant actors, including a diverse range of Roma representatives, especially at the local level (see paragraph 57, Article 4);

7) The Advisory Committee calls on the authorities to continue to promptly and unequivocally condemn all incidents of hate speech, in particular by political leaders and public figures, and foster intercultural dialogue and a spirit of tolerance and mutual respect among the general public. A comprehensive and inclusive approach to addressing historic events, including a public and unequivocal condemnation of war crimes and those who committed them, irrespective of the ethnicity of the perpetrator or the ethnicity of the victims, is also needed to promote inter-ethnic dialogue (see paragraph 86, Article 6);

8) The Advisory Committee calls on the authorities to assess the current situation regarding the access of Roma to quality education and implement long-term sustainable measures, in co-operation with Roma representatives, schools, parents and students, to improve their access to such education, including secondary school education (see paragraph 136, Article 12);

9) The Advisory Committee reiterates its calls on the authorities to allow minority schools conducting instruction in Serbian language and Cyrillic script to re-register according to the model A in the county of Vukovar-Srijem, in line with the applicable legislation (see paragraph 146, Article 14);

10) The Advisory Committee calls on the authorities to continue conducting a comprehensive assessment of the impact of employment-related measures under the National Plan for Roma Inclusion 2021-2027 on the economic empowerment of Roma. Further efforts should be made to improve employment outcomes for the Roma - particularly in the most disadvantaged regions - and to further strengthen targeted policies for Roma women and youth (see paragraph 164, Article 15).

Other recommendations

11. The authorities are invited to take account of the detailed observations and recommendations contained in the present Opinion of the Advisory Committee.

Follow-up to these recommendations

12. The Advisory Committee encourages the authorities to translate and publish the present Opinion into the official and minority languages and disseminate its findings and recommendations widely among all stakeholders.

13. Furthermore, the Advisory Committee encourages the authorities to organise a follow-up event after the publication of this sixth cycle Opinion to discuss and identify ways of implementing the recommendations made in this Opinion.

MONITORING PROCEDURE

Follow-up activities and awareness-raising related to the recommendations of the Fifth Opinion of the Advisory Committee

14. A follow-up meeting on the implementation of the recommendations of the Fifth Opinion of the Advisory Committee took place on 23 May 2022 in Zagreb with the participation of experts of the Advisory Committee.[1] The Fifth Opinion was translated into Croatian and published on the website of the Office for Human Rights and Rights of National Minorities (OHRRNM), where the Framework Convention has its dedicated website.[2] The Advisory Committee commends this website and appreciates the commitment of the authorities to make its recommendations available to all authorities. However, the Fifth Opinion was not translated into national minority languages.

Preparation of the state report for the sixth cycle

15. The sixth state report was received on 15 June 2023. Organisations representing and promoting the rights of persons belonging to national minorities were consulted in its preparation.[3] Some gender-related aspects of minority rights were addressed throughout the report, but not in a specific manner as requested in the outline of the sixth cycle state reports.[4]

Country visit and adoption of the Sixth Opinion

16. This sixth cycle Opinion on the implementation of the Framework Convention by Croatia was adopted in accordance with Article 26(1) of the Framework Convention and Rule 25 of Resolution (2019)49 of the Committee of Ministers. The findings are based on information contained in the sixth state report, other written sources, as well as information obtained by the Advisory Committee from governmental and non-governmental sources during its visit to Zagreb, Novigrad/Cittanova, Rovinj/Rovigno, Vukovar, Orehovica, Kuršanec and Pribislavec from 9 to 13 June 2025.

17. The Advisory Committee expresses its gratitude to the authorities for their constructive co-operation before, during and after the visit, and to the other interlocutors it met during the visit for their valuable contributions. The draft Opinion, as approved by the Advisory Committee on 12 February 2026, was transmitted to the Croatian authorities on 17 February 2026 for observations, according to Rule 37 of Resolution (2019)49. The Advisory Committee welcomes the observations received from the Croatian authorities on 24 April 2026.

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18. A number of articles of the Framework Convention are not covered in the present Opinion. Based on the information currently at its disposal, the Advisory Committee considers that the implementation of these articles does not give rise to any specific observations. This statement is not to be understood as signalling that adequate measures have now been taken and that efforts in this respect may be diminished or even halted. Rather, the Advisory Committee considers that the obligations of the Framework Convention require a sustained effort by the authorities. The Advisory Committee assesses the situation in the light of the circumstances prevailing at the time of monitoring. This Opinion reflects the situation in the country at the time of adoption of the Opinion.

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[1] See the meeting report.
[2] See the dedicated website on the Framework Convention of the Office for Human Rights and Rights of National Minorities (OHRRNM).
[3] See sixth state report, pp. 139-143.
[4] See outline for the sixth cycle reports, general guideline 7.

ARTICLE-BY-ARTICLE FINDINGS

Scope of application (Article 3)

19. The scope of application of the Framework Convention by Croatia has remained unchanged. As detailed in previous Opinions,[5] the Constitution of Croatia[6] explicitly recognises 22 national minorities[7] and the Croatian authorities continue to apply the Framework Convention to these minorities and persons affiliating with them. The Advisory Committee notes that despite its previous recommendations,[8] citizenship remains a criterion for legal recognition.[9] Interlocutors of the Macedonian[10] and Roma national minorities expressed their concerns about the difficulties encountered in obtaining Croatian citizenship.

20. The authorities informed the Advisory Committee that, during the monitoring period, no persons affiliating with any other community had requested legal recognition as a national minority or expressed their wish to benefit from the provisions of the Framework Convention.[11] As regards the level of awareness and understanding of the Framework Convention, apart from the welcome follow-up meeting on the Fifth Opinion on Croatia, which took place in Zagreb in 2022,[12] and an international conference in Zagreb in December 2022 on the first 20 years of the Constitutional Act on the Rights of National Minorities with participation of the Secretary-General of the Council of Europe, the Prime Minister, the Ombudsperson, the President of the Advisory Committee on the Framework Convention and the Chair of the Committee of Experts of the European Charter for Regional or Minority Languages,[13] the Croatian authorities' efforts to raise general awareness of the Framework Convention and its objectives have been limited. These efforts have mainly consisted of activities[14] carried out within the scope of the "Operational Programmes for National Minorities,"[15] which the Government adopted with a view to implementing the Constitutional Act on the Rights of National Minorities[16] (see Article 4). Furthermore, the Office for Human Rights and Rights of National Minorities (OHRRNM)[17] publishes relevant information and documents, including state reports and the Advisory Committee's Opinions on implementation of the Framework Convention by the Croatian authorities. However, interlocutors of national minorities reported low awareness of responsibilities and obligations vested in the authorities under the Framework Convention to the Advisory Committee, particularly at local and regional (counties) levels, to the extent that this hampers the effective implementation of some provisions of the Framework Convention.

21. The Advisory Committee acknowledges that citizenship may be a legitimate requirement in fields such as representation in certain public offices and institutions. However, the general application of this criterion would constrain the guarantees associated with other important areas covered by the Framework Convention, such as non-discrimination and equal access to rights, *inter alia*, economic and social rights, as well as the promotion of mutual respect and understanding.[18] The Advisory Committee reaffirms its longstanding view that the personal scope of application should, where appropriate, also extend beyond citizens, particularly where exclusion on grounds of citizenship may lead to unjustified and arbitrary distinctions, such as when the persons concerned permanently reside on a given territory.[19] The Advisory Committee stresses that the citizenship criterion should not disadvantage

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[5] ACFC Fourth Opinion on Croatia, adopted on 18 November 2015, para. 10; ACFC Fifth Opinion on Croatia, adopted on 1 February 2021, para. 32.
[6] The Preamble and Article 15 of the Constitution of Croatia.
[7] Albanians, Austrians, Bosniaks, Bulgarians, Czechs, Germans, Hungarians, Italians, Jews, Macedonians, Montenegrins, Poles, Roma, Romanians, Russians, Rusyns, Serbs, Slovaks, Slovenes, Turks, Ukrainians and Vlachs. As in previous opinions of the Advisory Committee, the term "Ruthenian(s)' has been used in the present opinion, instead of 'Rusyn(s)".
[8] ACFC Fourth Opinion on Croatia, para. 11; ACFC Fifth Opinion on Croatia, para. 35.
[9] ACFC Fourth Opinion on Croatia, para. 10; ACFC Fifth Opinion on Croatia, para. 33.
[10] See sixth state report, p. 140.
[11] Some interlocutors informed the Advisory Committee about the Ashkali community's intention to gain recognition. However, the Advisory Committee understands that this has not resulted in any official request for legal recognition.
[12] See sixth state report, p. 5.
[13] See details, Ured za ljudska prava i prava nacionalnih manjina (6 December 2022), "Održana međunarodna znanstvena konferencija „Prvih dvadeset godina Ustavnog zakona o pravima nacionalnih manjina".
[14] See sixth state report, pp. 7-8, 33 and additional information provided by the authorities on 23 July 2025.
[15] Ured za ljudska prava i prava nacionalnih manjina - Operativni programi nacionalnih manjina (in Croatian).
[16] The Constitutional Act on the Rights of National Minorities (Narodne novine, nos. 155/2002, 47/2010, 80/2010, 93/2011).
[17] See the dedicated website on the Framework Convention of the Office for Human Rights and Rights of National Minorities (OHRRNM).
[18] OSCE High Commissioner on National Minorities, Recommendations on the Effective Participation of National Minorities in Social and Economic Life, 2023, I. General Principles, 7: "States should address barriers to full and effective social and economic participation caused by the inability to demonstrate or acquire a citizenship. This should include taking all available measures to end statelessness, such as ensuring that no child is born stateless, implementing proper birth registration, ensuring equal access to documentation, and removing any ethnic, religious, linguistic or gender discrimination from citizenship laws." See also the Explanatory Note to guideline 7, pp. 28-29.
[19] ACFC Thematic Commentary No. 4, The Framework Convention: a key tool to managing diversity through minority rights. The scope of application of the Framework Convention for the Protection of National Minorities, adopted 27 May 2016, paras. 29-30.

stateless persons[20] and notes that some persons affiliating with Roma minority in Croatia may still lack Croatian citizenship.[21]

Recommendations

22. **The Advisory Committee reiterates its recommendations included in its previous Opinions and calls on the authorities to adopt a pragmatic and flexible case-by-case approach in implementing minority rights, including economic and social ones, under the Framework Convention.** In particular, this approach should be applied to non-citizens who have self-identified as affiliating with a national minority.

23. The Advisory Committee strongly encourages the authorities to raise awareness of the Framework Convention as a tool for managing diversity through minority rights and the protection it offers among officials at all levels, in particular at the regional and local levels, and throughout the society for example through public awareness campaigns.

Population census and data collection (Article 3)

24. The most recent census of population, households and dwellings was carried out in 2021. Compared to the 2011 Census, it recorded a significant 9.64% decrease[22] in Croatia's total population.[23] Persons belonging to the 22 national minorities constitute 6.2% of the population, reflecting a 1.47% drop in their share since 2011.[24] Their total number declined from 328 738 in 2011 to 240 079 in 2021,[25] representing a 26.97% decrease over the ten-year period.

25. With the exception of five smaller national minorities, each comprising between 0.01% and 0.08%[26] of the total population, and the Roma, who account for 0.46% of the population[27] and are the third-largest national minority, all other national minorities experienced a significant decline in both absolute numbers and population share between the two censuses. The overall number decreased by more than 15% for 14 minorities,[28] while only six minorities recorded an increase.[29] The largest decline was among the Serbs, the biggest minority in the country, whose population fell to 123 892 - a drop of 33.62%.[30]

26. While the overall population decline accounts for only some of this decrease, specific reasons vary among national minorities. Interlocutors cited factors such as an ageing population as well as a general reluctance to self-identify. In the case of Serbs, whose numbers fell sharply, post-census research identified three main causes: 1) an unfavourable age structure, with the average age of 56.1 years among Serbs in 2021,[31] 2) emigration from Croatia (primarily to Serbia, and to European Union (EU)

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[20] According to the 2021 census, 558 persons (0,01% of the population) in Croatia are stateless. The census also contains a category "unknown citizenship", under which 173 persons were registered, compared to 2 137 in the last census in 2011. This decrease is likely because the majority of people with "unknown citizenship" resulted from the political changes with the break-up of the former Yugoslavia have resolved their legal status. Reports suggest that persons with this status originate mainly from other countries of the former Yugoslavia, mostly as a result of state succession and lack of birth registration in the birth registry records. See European Network on Statelessness (2023): Index Survey on Croatia, p. 5. Additionally, the Advisory Committee has been informed by the authorities that the figures for stateless persons and persons of "unknown citizenship" cited from the 2021 census are overestimated, potentially due to misunderstandings by the respondents who filled in the forms online. According to the official records of the Ministry of Interior, as of 31 December 2025, the number of stateless persons is 22, while persons of "unknown citizenship" is 71.

[21] See European Network on Statelessness (2023): Index Survey on Croatia, pp. 6, 26-27; UN Human Rights Committee, Concluding observations on the fourth periodic report of Croatia, CCPR/C/HRV/CO/4, 11 September 2024, paras. 39-40; Civil Rights Project SISAK (2025), BEZDRŽAVLJANSTVO U HRVATSKOJ s osvrtom na Rome – IZVJEŠĆE ZA 2024 (Statelessness in Croatia with a focus on Roma – 2024 Report) (in Croatian).

[22] According to the 2011 census, the population was 4 284 889. This dropped to 3 871 833 in the 2021 census.

[23] Croatian Bureau of Statistics, Census 2021.

[24] Table 3 of the Data of previous censuses, Croatian Bureau of Statistics. The data show a slight increase in the proportion of individuals identifying as Croats, from 90.42% in 2011 to 91.63% in 2021. See also sixth state report, pp. 21-22.

[25] According to 2021 census: Albanians (13 817), Austrians (365), Bosniaks (24 131), Bulgarians (262), Czechs (7 862), Germans (3 034), Hungarians (10 315), Italians (13 763), Jews (410), Macedonians (3 555), Montenegrins (3 127), Poles (657), Roma (17 980), Romanians (337), Russians (1 481), Ruthenians (1 343), Serbs (123 892), Slovaks (3 688), Slovenes (7 729), Turks (404), Ukrainians (1 905) and Vlachs (22).

[26] Austrians, Turks, Russians, Jews and Germans.

[27] According to the 2021 census, there are 17 980 Roma (0.46% of the population). However, it is estimated that the number is much higher, amounting to between 25 000 and 40 000 people. See Atanasov, A., Kovačević, N., Spitálszky, A., Vukasović Ravlić, Ž. (2021) Discrimination against Roma in Croatia and Bulgaria: A comparative report, p. 3; ECRI's Sixth Report on Croatia (2025), para. 66.

[28] Czechs 18.45%, Jews 19.44%, Albanians 21.10%, Slovaks 22.40%, Romanians 22.52%, Italians 22.71%, Bosniaks 23.34%, Vlachs 24.13%, Bulgarians 25.14%, Slovenes 26.50%, Hungarians 26.65%, Ruthenians 30.65%, Montenegrins 30.77%, Serbs 33.61%. See Annual ombudsperson's report for 2022, p. 108.

[29] Austrians 22.9%, Germans 2.32%, Roma 5.92%, Russians 15.79%, Turks 10.08% and Ukrainians 1.44%. See Annual ombudsperson's report for 2022, p. 108.

[30] According to the results of the 2021 census, Serbs constitute 3.2% of the population, with 62 741 fewer individuals recorded as affiliating with the Serb minority compared to 2011.

[31] According to Worldometer, in 2025, median age Croatia was 45.3.

member states), and 3) ethnic appropriation and assimilation.[32] Regarding the latter, this research also noted that fear of stigma and discrimination prompts many Serbs, especially in urban areas, to conceal their identity, reducing both their visibility and their ability to fully exercise their rights under the Framework Convention.[33]

27. According to the information provided by the authorities,[34] when developing relevant acts[35] to implement the 2021 census, national minority representatives were consulted to ensure that a free declaration of ethnic identity, language and script was possible. A proportional number of census interviewers from minorities were engaged in areas with historic minority presence, such as Osijek-Baranja and Vukovar-Srijem counties. The census questionnaire was published online in minority languages and scripts.[36] The authorities also supported awareness campaigns implemented by minority associations, provided relevant funding,[37] and publicly promoted these campaigns through the media. Representatives of the Croatian Bureau of Statistics participated in events relating to minority rights to share census-related information and responded promptly to all queries from minority representatives.

28. The census was conducted in two phases: an online questionnaire completed by respondents themselves, and door-to-door interviews using electronic devices. In areas with significant national minority populations, census interviewers from the same minorities - Bosniak, Czech, Hungarian, Italian, Roma and Serb - were included. Where too few qualified minority interviewers were available, such as in some Roma settlements, field interviewers were accompanied by local persons affiliating with national minorities to ensure accurate understanding. However, the representatives of the Ruthenian and Ukrainian national minorities regretted the lack of census enumerators from their respective minority.

29. Questions on ethnicity, "mother tongue", and religion were voluntary and open-ended, including the "other" option, and allowed interviewees to declare one other than Croat, thereby creating more space for free self-identification. However, in cases where multiple entries of ethnic affiliation were made, priority was given to the first entry.[38] This was despite the Advisory Committee's concern, expressed in its Fifth Opinion, that multiple affiliations have not been reflected as separate categories, but categorised as "other", which may have discouraged the respondents from declaring their multiple affiliations for fear that a minority threshold might not be met, thus negatively impacting the rights of persons belonging to that particular national minority.[39] Among various national minority representatives, including Albanians and Bosniaks, the Advisory Committee was informed about a certain confusion regarding the classification of individuals who declared more than one ethnic affiliation.[40]

30. While the interlocutors of the Advisory Committee generally expressed satisfaction[41] with the conduct of the 2021 census, they raised concerns about the new Act on the Central Population Register,[42] adopted in March 2025 and fully implemented on 1 June 2026. According to the new Act, the Central Population Register shall consist of a general and a special part, whereby the latter may contain data on "religion and mother tongue" and "information on ethnicity" (*nacionalnost*) based on a voluntary declaration, and will also integrate information from various datasets, such as on education, health insurance, pension insurance and housing.[43] The Central Population Register will serve as the main source for population and census statistics in Croatia, with confidentiality and quality safeguards anchored in the Act on Official Statistics. During the legislative process, the ombudsperson stressed the need to ensure that the data is accurate, regularly updated and processed and protected in

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[32] See Klempić Bogadi, S. (2024), The Community Deserves a Future: The Demographic Picture and Future of Serbs in Croatia (Zajednica zaslužuje budućnost: Demografska slika i budućnost Srba u Hrvatskoj), Serb National Council and Jesenski i Turk, p. 31; Serb National Council (*Srpsko narodno vijeće* – SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 8.

[33] SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 9.

[34] See sixth state report, pp. 19-21.

[35] The Act on the 2021 Population, Households and Dwellings Census of the Republic of Croatia (Narodne novine, nos. 25/20, 34/21), which stipulated all the organisational and financial aspects of the census implementation. See sixth state report, p. 19.

[36] Census questionnaire to be used to collect data on individuals, households, and dwellings (in Croatian).

[37] For example, the Government allocated €13 272.28 to the Serb National Council's "Popis 21" project and approved €46 452.98 for the Roma association "Kali Sara" to raise awareness among Roma about the census and related rights.

[38] Additional information provided by the authorities on 23 July 2025.

[39] ACFC Fifth Opinion on Croatia, paras. 50-52. See similar considerations on the shortcomings regarding the metholodgy of census by the UN Committee on the Elimination of Racial Discrimination (CERD) in its Concluding observations on the combined ninth to fourteenth periodic reports of Croatia, CERD/C/HRV/CO/9-14, 2 October 2023, paras. 5-6.

[40] The authorities explained that, in the case of Bosniaks and Albanians, if they did mention "Bosniaks - Muslims" or "Albanians - Muslims", then the first entry was considered. The Advisory Committee also notes with interest that over 12 000 individuals indicated a regional identity such as "Dalmatian" or "Istrian" as an ethnic affiliation.

[41] The Council for National Minorities also reported that it had not received any complaints. See sixth state report, p. 21.

[42] Narodne novine, no. 67/25.

[43] Article 10 (4), Narodne novine, no. 67/25. The relevant information about religion, "mother tongue" and ethnicity are in Article 10 (4), points 2 and 3.

accordance with relevant national and international data protection laws.[44] The authorities stated that this new register will provide a strong foundation for improving methods and consolidating key statistical data, although it cannot fully substitute all census information.[45]

31. The Advisory Committee reiterates its view that "reliable information about the ethnic composition of the population is an essential condition for the implementation of effective policies and measures to protect minority rights, to contribute to the preservation, assertion and development of minority identities, and to address the needs and interests of persons belonging to national minorities, including intersectional aspects such as gender and age. Population statistics should be collected regularly and complemented with information gathered through independent qualitative and quantitative research".[46]

32. The Advisory Committee also emphasises the key importance of census data, as the Croatia's Constitutional Act on the Rights of National Minorities ties the exercise of various minority rights, including the right to use the relevant minority language (see Articles 10 and 11) and to hold elections for the local self-governments (see Article 15), to numerical thresholds and the proportion of a given national minority in the total population of the state or of a local and subregional (regional) self-government unit as recorded in the census. The Advisory Committee understands that these rights will continue to be determined based on the official results from the 2021 census until 31 December 2033 after which the data from the Central Population Register will be considered authoritative for the exercise of such rights. To do this, the Central Population Register shall, as a one-off measure, take over data on ethnicity from the Register of Voters on 1 January 2034.[47]

33. Against this background, the Advisory Committee expresses its concerns about the potential risks this new system of data collection entails, in terms of the exclusion of individuals affiliating with national minorities who are not identified as such in the Register of Voters. It therefore underscores the need to carefully assess the potential implications of this new act as well as to conduct proper consultations with representatives of all national minorities about its provisions. Efforts should also be made to address any possible shortcomings by providing clear implementation guidelines for data collection beyond 2034 that fully comply with international data protection standards, including the principles of informed consent, anonymity, confidentiality, clarity of purpose of processing,[48] as well as the principle of voluntary and free self-identification of everyone. This is particularly important given that the new act foresees the use and compilation of data from different datasets. Such measures would help prevent misinterpretation of the new act and reduce potential reluctance of persons affiliating with national minorities to exercise their right to free self-identification. It is also crucial that the process of collecting data on the ethnic, religious and linguistic affiliations of persons belonging to national minorities fosters sufficient trust and ensures that these persons genuinely feel free to express their affiliations without any fears of negative consequences, as determined by Article 3 of the Framework Convention.

34. The Advisory Committee further underlines that the absence of accurate and up-to-date equality data on persons affiliating with national minorities, for example Roma, significantly undermines the effectiveness of strategic frameworks on access to minority rights, since this is key to ensuring evidence-based policy making and for measuring the actions taken. In this regard, the Advisory Committee wishes to draw attention to the concluding observations of UN Committee on the Elimination of Racial Discrimination (CERD) on the lack of such data in Croatia.[49] Nonetheless, it is pleased to learn from the authorities that in 2026, the government plans to follow up the Roma Inclusion Baseline, which was conducted in 2018. Additionally, the Advisory Committee expresses its hope that the authorities will apply the new Act on the Central Population Register in full conformity with the wording inspired in Article 3 of the Framework Convention and that it further notes the importance of strengthening the capacity of relevant authorities to ensure effective implementation of this new act, as the Register will serve as the main source of such data in future. This should enable the systematic collection of equality data on persons affiliating with national minorities and promote greater use of such data among relevant bodies.

Recommendation

35. The Advisory Committee strongly encourages the authorities to issue clear guidelines for the implementation of the Act on the Central Population Register and ensure that any future data collection on persons affiliating with national minorities based on this act is carried out in full compliance with

[44] See the Annual Ombudsperson's Report for 2024, p. 165.
[45] Additional information provided by the authorities on 23 July 2025.
[46] See ACFC Thematic Commentary No. 3, The Language Rights of Persons Belonging to National Minorities under the Framework Convention, adopted on 24 May 2012, para. 19.
[47] Article 45, Narodne novine, no. 67/25.
[48] ACFC Thematic Commentary No. 4 (2016), paras. 18 and 66.
[49] UN Committee on the Elimination of Racial Discrimination (CERD), Concluding observations on the combined ninth to fourteenth periodic reports of Croatia, CERD/C/HRV/CO/9-14, 2 October 2023, paras. 5-6.

international data protection standards and the right to free self-identification, including a possibility to express multiple affiliations. Such data should be applied as a reliable basis for policy decisions regarding access to and the effective enjoyment of minority rights. The Advisory Committee further invites the authorities to maintain a substantive dialogue with representatives of national minorities to ensure that complementary disaggregated data collection, such as through independent research and empirical surveys, is duly taken into account.

Anti-discrimination legal, policy and institutional framework (Article 4)

36. As elaborated in the earlier Opinions of the Advisory Committee,[50] the legal framework on promoting equality and combating discrimination remains covered by, *inter alia*, the Constitution, the Constitutional Act on the Rights of National Minorities, the Anti-discrimination Act and the Criminal Code. The Anti-discrimination Act prohibits discrimination on the basis of an open-ended list of grounds that include national or ethnic origin, nationality, language and religion, which has remained unchanged since the fifth monitoring cycle. While multiple discrimination is explicitly defined by the Anti-discrimination Act, intersectional discrimination is not explicitly prohibited either under this act or by other legislation. However, the ombudsperson has applied the concept of intersectional discrimination in practice, and has identified such discrimination in several cases.[51]

37. The authorities informed the Advisory Committee of cases related to discrimination on the grounds of racial, ethnic or national origin handled in civil, criminal, and misdemeanour proceedings in 2022, 2023, and 2024, indicating a steady increase over the years.[52]

38. Throughout the monitoring period, the legal framework has been reinforced by the adoption of policies, including the National Plan for the Protection and Promotion of Human Rights and Combating Discrimination for the period to 2027,[53] which is implemented through yearly action plans[54] and carried out by the OHRRNM. While the action plan for 2024 was not adopted, those concerning 2023 and 2025 were adopted but with a delay. Several interlocutors noted that the absence of action plans creates a significant implementation gap, particularly in combating discrimination and supporting affected individuals and communities, including national minorities such as the Roma. In particular, they highlighted the lack of public calls for civil society organisations, which depend on the adoption of such action plans, to implement projects in areas such as education, legal aid and support for victims of hate crimes.[55]

39. One of the strategic objectives of the Action Plan on Human Rights for 2025 is to strengthen minority rights mechanisms by improving the implementation of the Constitutional Act on the Rights of National Minorities, monitoring the participation of national minorities in public life, developing state-level exams in minority languages, and supporting campaigns that highlight the contributions of national minorities to Croatian society (see Article 6).[56] Similarly, the Action Plan on Combating Discrimination for 2025[57] foresees measures targeting persons affiliating with national minorities. These include acknowledging the structural and intersectional discrimination they face, as well as improving their representation and providing administrative support for minority councils. Other measures include ensuring equal access to education, housing and employment, improving cultural visibility and combating hate speech based on ethnic grounds and hate crimes. However, no information was available regarding the follow-up to these anticipated deliverables. In addition, these strategic frameworks have neither dedicated budgets nor concrete timeframes and indicators of success to measure progress.

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[50] ACFC Fourth Opinion on Croatia, paras. 17-18; ACFC Fifth Opinion on Croatia, para. 55.

[51] See EELN Report (2025), Country report non-discrimination – Croatia, pp. 22-24. Similarly, the authorities informed the Advisory Committee that this concept has been incorporated into the current and upcoming national plans for protection and promotion of human rights and combating discrimination as well as training programmes for law enforcement and judiciary on anti-discrimination.

[52] With regard to criminal cases, 14 cases were recorded in 2022, 11 in 223 and 15 in 2024. As regards the number of civil cases, there were 44 in 2022, 34 in 2023 and 70 in 2024 while it was 223 in 2022, 216 in 223 and 222 in 2024 for misdemeanour cases. Additional information provided by the authorities on 23 July 2025.

[53] National Plan for the Protection and Promotion of Human Rights and Combatting Discrimination for the period to 2027. The authorities informed the Advisory Committee that there are no evaluation reports of the preceding National Plan for Combatting Discrimination in the 2017-2022 or its action plan.

[54] Ured za ljudska prava i prava nacionalnih manjina - Nacionalni plan zaštite i promicanja ljudskih prava i suzbijanja diskriminacije za razdoblje do 2027. godine (in Croatian).

[55] The submission by the Centre for Peace Studies and Human Rights House Zagreb to the Advisory Committee on 28 May 2025. The Advisory Committee understands that this is further exacerbated by the fact that the National Plan for Creating an Enabling Environment for Civil Society Development has still not been adopted. See Civil Liberties Union for Europe (2025), The Liberties Rule of Law Report 2025, p. 219.

[56] Akcijski plan zaštite i promicanja ljudskih prava za 2025. godinu (in Croatian).

[57] Akcijski plan suzbijanja diskriminacije za 2025. godinu (in Croatian).

40. The Advisory Committee has been informed by the authorities that the ombudsperson's office is supported by ensuring material and financial conditions along with interdepartmental co-operation to implement her recommendations. The budget of the office continued to increase in the last two years: for 2024, it was €2 781 789 (17.55% increase), and for 2025, €3 225 937 (15.97% increase). Nonetheless, during its visit, interlocutors, however, raised particular concerns about the capacity of the OHRRNM, whose limited resources call into question its ability to co-ordinate implementation and monitoring of the National Plan for the Protection and Promotion of Human Rights and Combatting Discrimination for the period to 2027. The Advisory Committee considers that these shortcomings reflect limitations in aligning strategic planning with institutional capacity.

41. Regarding the institutional framework for anti-discrimination, the ombudsperson continues to be the multi-mandated equality body and the national human rights institution (NHRI) in Croatia with a broad range of competences.[58] Their mandate covers all cases of discrimination except for those that fall within the remit of specialised ombudspersons.[59] During the monitoring period, the number of discrimination complaints handled by the ombudsperson was 469 in 2021, 376 in 2022, 362 in 2023 and 420 in 2024.[60] The vast majority of these complaints concerned discrimination based on "race", ethnicity, skin colour or national origin, which accounted for 20% of all complaints on average. Most cases related to the fields of labour and employment, followed by access to goods and services, and then by public information and media, education and social welfare.

42. The ombudsperson's office conducts outreach activities through its regional offices in Osijek, Rijeka and Split. Although no additional regional offices have been established, as recommended in the Advisory Committee's Fifth Opinion, the ombudsperson continues their efforts to reach persons belonging to national minorities by conducting *in situ* visits across Croatia, particularly to Roma settlements and municipalities where Roma and other national minorities reside. However, the Advisory Committee understands that while staff numbers and management structures have been strengthened[61] and overall resources are generally considered adequate,[62] the limited budget for outreach and research hampers the ombudsperson's ability to conduct such visits, which are essential to identify systematic problems faced by persons affiliating with national minorities.

43. The Advisory Committee's interlocutors expressed satisfaction with the constructive and supportive dialogue they maintain with the ombudsperson, praising its consistent efforts to protect and promote their rights and their strong commitment to ensuring non-discrimination and equality. At the same time, despite the high level of trust the institution enjoys - also reflected in the growing compliance of public authorities with its recommendations[63] - its work has been affected by delays in the parliamentary discussion and approval of its annual reports.[64] For instance, the 2022 Annual Report was only debated in 2025, while the opinions on the 2023 and 2024 Annual Reports have not yet been adopted by the government, which is a prerequisite for parliamentary debate.[65]

44. The Advisory Committee underlines that equality bodies should be able to proactively exercise all their functions and competences with real impact and should be provided with sufficient staff and funds to do so.[66] Regional outreach initiatives by the equality bodies to ensure greater visibility and regular presence among communities and individuals exposed to discrimination and intolerance throughout the country are particularly important in this regard. The Advisory Committee further underlines the

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[58] ACFC Fifth Opinion on Croatia, paras. 62-64. The European Commission against Racism and Intolerance (ECRI) indicated that the powers and status of the ombudsperson were mostly in line with its ECRI General Policy Recommendation No. 2: Equality bodies to combat racism and intolerance at national level, except in the fact that it still lacks the power to bring civil cases concerning an individual person. See ECRI's Sixth Report on Croatia (2025), para. 2.

[59] The Ombudsperson for Gender Equality, the Ombudsperson for Children and the Ombudsperson for Persons with Disabilities.

[60] Based on the annual reports of the ombudsperson.

[61] In 2024, the Office's staff consisted of 56 civil servants and one employee, and the budget for 2024 was increased by 17.55% and amounted to EUR 2 781 789 (of which 98.48% was used). See UN Human Rights Council, Working Group on the Universal Periodic Review, A/HRC/WG.6/50/HRV/1, National Report submitted by Croatia, 27 August 2025, para. 7.

[62] The Advisory Committee, however, notes with concern that the ombudsperson's office remains in temporary premises with limited space, following the severe damage to its main building during the 2020 Zagreb earthquake, which rendered it unusable.

[63] In 2023, competent public authorities acted on 73% of recommendations of the ombudsperson while this was 61% in 2022, and 43% in 2020. The Government Office for Human Rights and Rights of National Minorities (OHRRNM) regularly co-ordinates the reporting on the level of implementation of the recommendations of the ombudsperson. See the Republic of Croatia (2024), Mid-term Report on Follow-up of the Recommendations of the United Nations Human Rights Council under the Universal Periodic Review Mechanism (UPR), p. 9; EU Commission (2025) – Rule of law report – Country Chapter Croatia, p. 17; EU Commission (2024) – Rule of law report – Country Chapter Croatia, pp. 29-30.

[64] The Ombudsperson (13 June 2025), The Rules of Procedure of the Croatian Parliament Must Ensure Timely Debate on Reports by Independent Institutions – Ombudswoman of Croatia; Annual ombudsperson's report for 2024, p. 353.

[65] See The Rules of Procedure of the Croatian Parliament Must Ensure Timely Debate on Reports by Independent Institutions – Ombudswoman of Croatia (13 June 2025); EELN Report (2025), Country report non-discrimination – Croatia, pp. 96-97. The authorities informed the Advisory Committee that the ombudsperson presented her report for the year of 2025 to the working bodies of the parliament and will present it only at the plenary session of the parliament in due course.

[66] See European Commission against Racism and Intolerance (2017), ECRI General Policy Recommendation No. 2: Equality bodies to combat racism and intolerance at national level, para. 28.

importance of awareness-raising among persons belonging to minorities in general, and particularly amongst those most exposed to discrimination, such as the Roma, of the ombudsperson's work and on the legal remedies available.[67]

45. Furthermore, the Advisory Committee emphasises that equality bodies should have both *de jure* and *de facto* independence and should function without any interference from the state, political parties or other actors. They should publish annual reports, which should be discussed by parliament or its relevant committees and by government, but not be subject to their approval.[68] In this context, the Advisory Committee is concerned that persistent delays in discussing the ombudsperson's annual reports risk diminishing the relevance and impact of their recommendations and weakening their effective implementation. The Advisory Committee stresses that the ombudsperson needs to operate in a politically supportive climate and reminds the authorities that timely discussions and the implementation of the ombudsperson's recommendations are an essential prefactor to enable the equality body to fulfil its mandate independently, impartially and effectively.[69]

Recommendations

46. **The Advisory Committee calls on the authorities to remove, both in legislation and in practice, any barriers, including approval by the government, that contribute to the delays in the debate of the ombudsperson's annual reports, to examine these reports in a timely manner, and to ensure the effective implementation of the ombudsperson's recommendations.** The authorities should also ensure that the ombudsperson is provided with adequate financial and human resources to carry out their mandate effectively. Additional funding should be allocated to support regional offices and expand their number, thereby strengthening outreach also to persons affiliating with national minorities.

47. The Advisory Committee requests that the authorities fully implement, regularly monitor and evaluate, the National Plan for the Protection and Promotion of Human Rights and Combatting Discrimination for the period to 2027 and its action plans, not only in terms of commitments but also in terms of their impact on immediate and long-term outcomes. Such implementation, monitoring and evaluations should be done in consultation with persons affiliating with national minorities, but also with the active engagement of the general population and relevant civil society organisations.

Operational Programmes for National Minorities (Article 4)

48. Operational Programmes for National Minorities (OPNMs)[70] remain a key tool for the effective implementation of the Constitutional Act on the Rights of National Minorities. The OPNMs comprise activities that are contained in the OPNM covering all national minorities, and also activities in the specific OPNMs for individual national minorities. Building on the 2017-2020 OPNM, the authorities adopted two new OPNMs: in December 2020 (covering 2021-2024) and in August 2024 (covering 2024-2028). The scope of activities has expanded,[71] with the latest programme including 40 more activities than in previous ones and with an increased budget.[72] As before, both programmes also contain specific OPNMs for the Albanian, Austrian, Bosniak, Czech, German, Hungarian, Italian, Montenegrin, Polish, Roma, Russian, Ruthenian, Serbian, Slovak, Slovene, Turkish and Ukrainian national minorities.[73] Funds that are assigned through OPNMs facilitate access to minority rights in many areas, such as the use of language and script (including in public and official use), education in minority languages, cultural autonomy, access to media and participation in public life.[74] A key feature of the OPNMs is their focus on regions inhabited by national minorities, which often lag in terms of socio-economic development. Infrastructure, rural development and business support projects are therefore vital to sustaining these minority communities.

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[67] In a survey conducted by the ombudsperson in 2022, only 3.9% of respondents correctly identify the ombudsperson as a central equality body for combating discrimination. See EELN (1 March 2023), Flash Report, Research on attitudes and the level of awareness of discrimination and the forms of discrimination for 2022.

[68] See European Commission against Racism and Intolerance (2017), ECRI General Policy Recommendation No. 2: Equality bodies to combat racism and intolerance at national level, paras. 22 and 35.

[69] N1 Info (7 July 2025), Plenković: Pravobraniteljicu da ja slušam? Kao premijer? Ona je tamo zahvaljujući meni (Plenković: "Me, listen to the Ombudswoman? As Prime Minister? She's there thanks to me").

[70] Ured za ljudska prava i prava nacionalnih manjina - Operativni programi nacionalnih manjina (in Croatian).

[71] The OPNMs comprise a total of 209 activities, of which 56 are contained in the OPNM covering all national minorities, and a total of 153 activities in the specific OPNMs.

[72] Funds in the state budget for the implementation of the Constitutional Act on the Rights of National Minorities were increased to EUR 28 673 392 (2020), EUR 39 092 672 in 2021, EUR 52 960 380 in 2022, EUR 71 144 136 in 2023, and for OPNMs to EUR 89 326 908 in 2022 and EUR 97 966 677 in 2023. See UN Human Rights Council, Working Group on the Universal Periodic Review, A/HRC/WG.6/50/HRV/1, National Report submitted by Croatia, 27 August 2025, para. 21.

[73] The Advisory Committee notes that while the general OPNM lists all 22 recognised national minorities, not all of them have dedicated activities in the specific OPNMs.

[74] See sixth state report, pp. 7-8.

49. During the monitoring visit, most interlocutors of the Advisory Committee, including those affiliating with the Czech, German, Italian, Serb and Slovak national minorities, commended the continuation of the OPNM and particularly the targeted measures for their respective communities. For instance, the number of activities in the 2024-2028 programme for the Serb national minority doubled compared to 2021-2024, rising from 25 to 51.[75] Some representatives of national minorities, such as those affiliating with the Jewish national minority, however expressed dissatisfaction with the short time frame they were given to provide comments on the latest OPNM. Despite this generally positive trend and its previous recommendations, the Advisory Committee notes that these OPNMs still lack clearly defined objectives, indicators, timelines and budgetary allocations for the implementation of planned activities.[76]

50. The authorities informed the Advisory Committee that reliable and regularly updated data on the use of the funds allocated to the national minorities under the OPNMs (see Article 5) are not available, partly due to delays in reporting by the national minority organisations. Co-ordination challenges also arise from the overlap between certain policy frameworks, notably the specific OPNM for Roma and the National Plan for Roma Inclusion (NRIP). In May 2025, a new intergovernmental commission was established to oversee the implementation of the OPNM 2024-2028.[77] The Advisory Committee considers that such institutional structures could play an important role in improving effective monitoring and evaluation of OPNM activities, strengthening co-ordination, and ensuring more effective use of funds, particularly in areas such as Roma inclusion.

Recommendation

51. The Advisory Committee strongly encourages the authorities to continue their efforts to establish effective channels of communication and co-ordination among all relevant bodies involved in implementing the 2024-2028 Operational Programmes for National Minorities. Continuous and structured dialogue with national minority representatives should be maintained both to assess the progress achieved and to identify any remaining shortcomings in implementation.

Promotion of effective equality for Roma (Article 4)

52. The policy framework for Roma is set out in the National Plan for Roma Inclusion (NRIP) for the Period 2021-2027, which was adopted in June 2021.[78] NRIP is based on the EU Roma Strategic Framework for equality, inclusion and participation and contains seven specific objectives: i) combatting anti-Roma racism and discrimination, ii) reducing poverty and social exclusion, iii) ensuring Roma participation in public life, ensuring effective access to iv) quality education, v) employment, vi) health services and vii) desegregated housing. While gender equality is not mentioned as a cross-cutting principle, the Advisory Committee welcomes the inclusion of gender-sensitive measures in several strands of NRIP, such as education and employment. Two action plans[79] have been developed under NRIP: for the periods 2021-2022 and 2023-2025, respectively.[80] The third one (for the period 2026-2027) is being developed, but the respective working group for its development was only appointed in early November 2025 and had its first meeting on 20 November 2025.[81] Additionally, other policy frameworks, such as the OPNM 2024-2028 (see Article 4 above), as well as the National Plan to Combat Poverty and Social Exclusion (2021-2027) include targeted measures for the inclusion of Roma. Data indicate that 92% of Roma in Croatia live in poverty, while 70% of Roma families experience extreme poverty.[82]

53. The drafting process of the NRIP was carried out by a working group, representing Roma organisations and other key stakeholders, such as the ombudsperson.[83] The baseline study,[84] as well

[75] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 12.
[76] ACFC Fifth Opinion on Croatia, para. 80.
[77] Narodne novine, no. 83/2025.
[78] National Plan for Roma Inclusion 2021-2027; See sixth state report, pp. 34-36.
[79] Ured za ljudska prava i prava nacionalnih manjina - Izrada Nacionalnog plana za uključivanje Roma 2021.-2027. i pratećih Akcijskih planova (in Croatian).
[80] In the latest Action Plan 2023-2025, of the 58 measures and activities foreseen, ten address anti-Roma racism, four focus on reducing poverty, eight on participation, 23 on education, six on employment, four on health, and three on housing.
[81] O osnivanju Radne skupine za izradu Nacrta Akcijskog plana za provedbu Nacionalnog plana za uključivanje Roma, za razdoblje od 2021. do 2027, godine, za 2026.-2027.
[82] National Plan for Roma Inclusion 2021-2027, p. 23. Most Roma households are below the at-risk-of-poverty threshold in Central Croatia (97.5%) and Slavonia (97.3%), followed by Međimurje (96.4%) and Northern Croatia (94.9%), Zagreb and surroundings (77.7%) and Istria and Primorje (76.8%).
[83] The Working Group consisted of 46 members and 43 substitute members drawn from representatives of state administration bodies, representatives of the Roma national minority, civil society organisations, academia, the ombudsperson and special ombudspersons (for children, persons with disabilities, gender equality).
[84] Kunac, S., Klasnić, K. and Lalić, S. (2018), Roma Inclusion in the Croatian Society: a Baseline data study. The Advisory Committee also notes that the OHRRNM has conducted a mapping exercise in 134 locations in the 15 counties of Croatia, where there are 24 524 persons affiliating with the Roma national minority across 4 599 households.

as the civil society monitoring report[85] on the previous strategic document (2013-2020), and numerous studies conducted during this period, also informed the discussions on this new NRIP.[86] Roma interlocutors expressed their general satisfaction with the participatory process during the development of this NRIP. Nevertheless, limited Roma representation in drafting the action plans reflected ongoing structural weaknesses and capacity constraints within Roma minority organisations.[87] The Advisory Committee notes that empowering and building the capacity of these organisations is essential to improve the design of measures aimed at overcoming structural disparities between Roma and the majority population in all areas of life.

54. The Monitoring Committee[88] for the NRIP brings together representatives from ministries, public institutions and Roma organisations. In 2025, a new Monitoring Committee was appointed, including seven Roma members elected through a public call for nominations.[89] According to the information provided by the authorities, the composition of Roma members in the committee reflects diversity within this community, based on geographic distribution, gender, age and language (including the Romani and Boyash Romanian). However, although the authorities insist that the process for the distribution of funds is transparent, as the Monitoring Committee also allocates funds,[90] several interlocutors questioned its transparency and fairness, raising concerns about potential conflicts of interest, thereby noting that all Roma members are linked to a single umbrella organisation that also held key roles in related projects. This suggests a concentration of influence, as also highlighted by the 2025 Roma Civil Monitor report[91] on NRIP implementation. Moreover, the Monitoring Committee's dual mandate of oversight and fund management appears to undermine its strategic focus, with monitoring functions often overshadowed by internal disagreements and an emphasis on distribution of funds.[92]

55. Roma representatives, while acknowledging the authorities' efforts and the growing budget[93] for Roma inclusion, emphasised that several challenges require urgent attention if further progress is to be achieved. These include insufficient implementation of Roma-related policies at local and regional levels and the need for more effective monitoring and reporting mechanisms. For example, although the co-financing of transport for Roma children from segregated settlements to schools was included in the NRIP 2021-2022 Action Plan to reduce segregation (see Article 12), no local authority requested its implementation.[94] In this context, the Advisory Committee welcomes the adoption of the 2025-2027 Action Plan for Roma Inclusion by the City of Zagreb in December 2024 as one of the very few local level initiatives.[95]

56. Against this background, despite the progress in promoting Roma inclusion in various areas, including culture and the recognition of Roma history, the Advisory Committee underlines the crucial role of municipalities as key actors at the forefront of inclusion efforts and in identifying the specific and diverse needs of Roma communities and persons affiliating with them. In this regard, the Advisory Committee considers that further steps are needed to establish effective channels of co-operation between the central authorities and the regional and local authorities in order to reduce overlaps in roles and responsibilities, create synergies between these actors, and enhance the overall efficiency of the implementation of the NRIP at all levels. Strengthening diverse Roma participation in decision-making through community-driven approaches can also foster ownership among these communities and more sustainable inclusion outcomes. Moreover, greater clarity regarding actual budget allocations and their long-term sustainability is essential, particularly with respect to additional funding sources and mechanisms, such as the OPNMs, that support Roma inclusion. Additionally, measures need to be

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[85] Roma Civil Monitor (for the period 2017-2020): available in Croatia – Roma Civil Monitoring.
[86] National Plan for Roma Inclusion 2021-2027, pp. 8-12.
[87] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, pp. 7 and 13.
[88] This committee is chaired by a Deputy Prime Minister and vice-chaired by the member of the parliament representing the Roma national minority.
[89] Commission for Monitoring the Implementation of the National Plan for the Inclusion of Roma for the Period 2021–2027 (in Croatian).
[90] Kriteriji za utvrđivanje financijske pomoći za poboljšanje uvjeta i kvalitete života pripadnika romske nacionalne manjine u Republici Hrvatskoj.
[91] Roma Civil Monitor (2025), Croatia: Assessment of the progress in the NRSF implementation between 1 June 2023 – 30 March 2025 (country fiche), p. 7.
[92] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, pp. 13-14; Roma Civil Monitor (2025), Croatia: Assessment of the progress in the NRSF implementation between 1 June 2023 – 30 March 2025 (country fiche), p. 3.
[93] Based on the additional information provided by the authorities on 23 July 2025, the budget was EUR 5 092 722.61 in 2022, EUR 5 116 399.66 in 2023 and EUR7 733 952.01 in 2024 for NRIP Action Plans. While the budget for OPNM for Roma were the following: EUR 6 149 585.56 in 2022, EUR 7 736 930.51 in 2023 and EUR 7 725 165.87 in 2024.
[94] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 30.
[95] Akcijski plan Grada Zagreba za 2025. - 2027. godinu za provedbu Nacionalnog plana za uključivanje Roma, za razdoblje od 2021. do 2027.

better tailored to the diverse needs of the Roma population, taking into account factors such as age and gender.[96]

Recommendation

57. **The Advisory Committee calls on the authorities to continue their efforts to ensure the effective implementation and monitoring of the National Plan for Roma Inclusion 2021-2027 at all levels as well as to strengthen co-ordination of its implementation through close co-operation with, and enhanced co-ordination among, all the relevant actors, including a diverse range of Roma representatives, especially at the local level.** Special attention should be given to ensuring the effective participation of Roma women and youth in developing relevant policies**.** Measures should also be taken to provide greater clarity on actual budget allocations and their long-term sustainability across the various mechanisms promoting Roma inclusion.

Equal access to rights (Article 4)

58. The policy objectives concerning equal access to rights for persons affiliating with national minorities are set out in numerous instruments, including the National Plan for the Protection and Promotion of Human Rights and Combatting Discrimination for the period to 2027, together with its annual action plans, as well as the OPNMs and the NRIP. Despite this comprehensive framework, equal access of persons affiliating with national minorities to several rights guaranteed under the Framework Convention is not sufficiently ensured in practice. This concern relates in particular to the equal and official use of minority languages and scripts (see Articles 10 and 11), equal access to education (see Article 12), education in minority languages and scripts (see Article 14), effective access to adequate housing (see Article 15) and the equal representation of persons belonging to national minorities in representative bodies as well as in public administration (see Article 15). These shortcomings are especially evident with regard to the two numerically larger minorities (i.e. the Serbian and Roma),[97] while representatives of national minorities were near-unanimous in observing the lack of equal representation in representative bodies and in public administration during their exchanges with the Advisory Committee.

59. According to the ombudsperson's survey on attitudes and perception of inequality and discrimination,[98] the Roma remain the group most exposed to discrimination and social exclusion, facing persistent barriers in access to their rights in various areas of life. The Advisory Committee notes that the NRIP 2021-2027 acknowledges anti-Roma racism as a key obstacle to Roma inclusion.[99] Nevertheless, public rhetoric that portrays them mainly as a burden on the country remains widespread. A significant pattern of discrimination is observed in education and schooling, with spatial segregation remaining a matter of grave concern (see Articles 12 and 15). Cases of denied access to services continue,[100] while 84% of Roma still live in overcrowded[101] and substandard housing without basic infrastructure including access to water and sanitation.[102]

60. Persons affiliating with the Serb national minority reported[103] that their equal access to rights continues to be affected by both persistent and sporadic manifestations of intolerance and hostility directed towards them and their institutions, particularly within political and wider public discourse (see Article 6). [104]

61. As also indicated by research,[105] the Advisory Committee observed that perceptions of discrimination among persons affiliating with the Serb national minority vary by region. In settlements where Serbs are a sizeable minority, such as Vukovar, reports of discrimination are more common, compared to regions such as Istria, where no such issues were reported during the Advisory Committee's visit. Despite these regional differences, the Serb National Council (SNV) noted persistent problems, particularly in implementing the 2021 Act on Civilian Victims of the Homeland War (1991-

[96] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 14.
[97] Annual ombudsperson's report for 2024, pp. 153-154; Ombudsperson (2022), Research on Attitudes and Awareness of Discrimination and Manifest Forms of Discrimination 2022 (in Croatian), p. 30.
[98] Annual ombudsperson's report for 2022, pp. 262-263.
[99] The legally non-binding working definition of anti-Roma racism and discrimination of the International Holocaust Remembrance Alliance (IHRA) was taken into account in drafting the NRIP 2021-2027, National Plan for Roma Inclusion 2021-2027, p. 16.
[100] These cases are reported to take place especially in hospitality establishments, including in the counties of Međimurska, Primorsko-goranska, and Osječko-baranjska, as well as in the City of Zagreb. Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 22.
[101] Compared to 36% of the general population. See EU FRA (2022), Roma in 10 European countries – Main results, p. 54.
[102] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 27.
[103] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 12.
[104] Balkan Transitional Justice (24 December 2024), Croatia in 2024: Rightward Shift Worries Serb Minority.
[105] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 11.

1995 war) citing numerous complaints about opaque and biased procedures that disproportionately affect women formerly married to Serbian soldiers.[106] The SNV also expressed concern over the lengthy procedures for access to rights under this act, with most of its 18 active cases pending for more than two years.[107]

62. However, progress has been made in providing free legal aid to the persons affiliating with the Serb national minority in war-affected areas of Šibenik-Knin and Zadar counties, including Benkovac, Gračac and Obrovac. This primarily supported issues related to housing reconstruction, property rights, and the status of returnees.[108] Nevertheless, the Advisory Committee notes that the implementation of the housing care programme for former tenancy rights holders (primarily individuals affiliating with the Serb national minority) continues to face major obstacles which prevent beneficiaries from exercising their rights. The main challenge is the acute shortage of suitable housing, exacerbated by rising real estate prices that limit state procurement capacity. Although the Agency for Transactions and Mediation in Immovable Properties (APN) was mandated to secure 149 apartments in 2024, by early 2025 only ten acceptable offers were recorded. As a result, many approved beneficiaries remain without housing.[109] In this context, the Advisory Committee welcomes the development that the 2024-2028 Operational Programme for the Serb national minority includes measures to complete the housing care programme for former tenancy rights holders, as well as to support the reconstruction, repair and furnishing of family homes and apartments,[110] with the aim of ensuring adequate housing provision.

63. The Advisory Committee notes that the 2025 Act on Cemeteries introduced new provisions requiring the removal of gravestone inscriptions related to the 1991-1995 war that may be deemed offensive by citizens,[111] because the previous Act on Cemeteries was applied exclusively to legal situations occurring after 21 February 1998, which was the date this act entered into force. According to the authorities, the 2025 Act addresses only the gravestone inscriptions which represent a denial of sovereignty of the Croatian state and glorification of the national ideology of "Greater Serbia". The adoption of this legislation has prompted public debate due to its lack of legal clarity and the broad scope of its provisions, which allow for diverse and even contradictory interpretations, as also noted by the ombudsperson.[112] This issue has raised particular concerns among persons affiliating with the Serb national minority, especially in light of cases such as the removal of a gravestone in the Municipality of Vrsi in 2023,[113] on the grounds that it was inscribed in Cyrillic (see Article 11), with some expressing fears that the new law could be used to justify similar actions.

64. The Advisory Committee reiterates that the promotion of full and effective equality in all spheres of life is central to the protection of minority rights. Therefore, awareness on the promotion of equality should also be raised among public authorities, in workplaces, schools and among wider stakeholders who can support the process. Such measures could make the legal and institutional anti-discrimination framework more accessible for persons affiliating with national minorities, including those in a vulnerable situation who are reluctant to approach these bodies[114] or lack information about available remedies in cases of alleged discrimination.

65. The Advisory Committee further notes that effective access to rights has to be based on the principle of equality and reiterates that Article 4(2) of the Framework Convention requires special measures to overcome structural disadvantages between the minority and the majority in all spheres.[115] The Advisory Committee is concerned that awareness of minority rights as an integral component of human rights is still limited in some regions where public discourse continues to be shaped by wartime narratives portraying some minority communities as "aggressors", leading to a perception that they are

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[106] Of 60 applications reviewed by the Serb National Council (SNV) in early 2025, only 15 were approved, while 45 were rejected; just nine applicants appealed to administrative courts. Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 13-14.

[107] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 13-14.

[108] See sixth state report, p. 32; UN Human Rights Committee, Concluding observations on the fourth periodic report of Croatia, CCPR/C/HRV/CO/4, 11 September 2024, para. 33.

[109] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 15-16.

[110] According to the information provided by the authorities, a total of 104 family houses were reconstructed between 2022 and June 2025, including 48 in 2022, 32 in 2023, 20 in 2024, and four by mid-2025.

[111] Republic of Croatia, Ministry of Physical Planning, Construction and State Assets (3 April 2025), Monuments glorifying Serbian aggression to be removed under new law; Euronews (1 May 2025), Croatia's new 'graveyard law' stirs Serb minority's sentiments.

[112] See the Annual Ombudsperson's Report for 2023, p. 138.

[113] Annual ombudsperson's report for 2023, pp. 137-138; Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 45-46.

[114] For instance, the ombudsperson's 2022 survey revealed that 60% of participants who believed they had experienced discrimination - representing 28% of all respondents - reported taking no action to seek protection of their rights. Ombudsperson (2022), Research on Attitudes and Awareness of Discrimination and Manifest Forms of Discrimination 2022 (in Croatian), p. 35.

[115] ACFC Thematic Commentary No. 4, (2016), para. 65.

merely tolerated rather than fully accepted members of society (see Article 6). The Advisory Committee also remains concerned about the resulting disparities in the enjoyment of minority rights across Croatia and reiterates that ensuring equal access to rights by persons affiliating with all national minorities and regardless of where they live requires coherent central co-ordination, clear policy guidance and sustained political commitment at all levels. This responsibility rests with the state as a whole and cannot be delegated solely to local or regional authorities, particularly in areas most affected by the 1991-1995 war. To this end, further measures need to be taken to strengthen the effectiveness of the existing policy framework, in particular those established under the special OPNMs. This entails an obligation on the Croatian authorities to implement measures that ensure equal access to rights for all persons belonging to national minorities and to achieve tangible results, supported by appropriate indicators for assessing progress and impact.

Recommendation

66. The Advisory Committee requests that the authorities ensure effective, targeted and evidence-based measures to address inequalities in access to rights faced by persons affiliating with national minorities, the Serbs and the Roma in particular. This should be done in a sustainable way, and in co-operation with diverse minority representatives, including women and youth. The authorities should monitor and evaluate outcomes of those measures at all levels.

Preservation and promotion of minority cultures and languages (Article 5)

67. As noted in the previous Opinions of the Advisory Committee,[116] at the central level three main institutions, namely the Ministry of Culture and Media, the Office for Human Rights and Rights of National Minorities (OHRRNM) and the Council for National Minorities, continue to promote the cultural autonomy of national minorities by providing financial support through various funding channels to programmes and projects of minority associations and institutions in fields such as culture, education, information and publishing. The sixth state report provides detailed information on the different strands of activities available for the preservation and development of national minority cultures.[117] These include, among others, the operation of museums, cultural centres and libraries, as well as the organisation of cultural events and art initiatives related to national minorities, and the construction, maintenance and restoration of venues belonging to minority associations and institutions. The Advisory Committee notes that funded cultural activities predominantly focus on folkloristic aspects, such as traditional music, dance and gastronomy of national minorities, and rarely promote intercultural interaction between minorities and the majority.

68. During the Advisory Committee's visit, minority interlocutors generally agreed in expressing full satisfaction with the funding provided for the promotion of national minority cultures, pursuant to the exercise of "*cultural autonomy*" as stipulated in the Croatian Constitution and the Constitutional Act on the Rights of National Minorities.[118] The Advisory Committee welcomes the authorities' continued efforts to maintain the level of funding for cultural activities, including through a significant increase in the budget allocated by the OHRRNM to the umbrella national minority associations,[119] as well as by the public calls of the Council for National Minorities[120] which has also benefited from an increased budget allocation. For instance, in 2026, this increase was 10%.[121]

69. Through these budgetary allocations, several cultural and community centres were opened during the sixth monitoring cycle. For example, in addition to the Roma Educational and Cultural Centre[122] opened in Zagreb in 2022, and the ongoing construction of another such centre in Istria, the Albanian Cultural Centre in Zagreb, aimed at nurturing Albanian language and literature, was opened in 2024.

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[116] ACFC Fourth Opinion on Croatia, paras. 36 and 38; ACFC Fifth Opinion on Croatia, paras. 87-89.
[117] See sixth state report, pp. 42-47 and 52-57.
[118] Article 15 of the Constitution of Croatia and Article 7(4) of the Constitutional Act on the Rights of National Minorities.
[119] Based on additional information provided by the authorities on 23 July 2025, these were EUR 33 180 702 in 2022; EUR 47 999 999 in 2023, EUR 53 071 000 in 2024 and EUR 66 000 000 in 2025, signifying an increase by 35% between 2023 and 2025.
[120] In 2023, the Council for National Minorities allocated EUR 8 030 292 for the implementation of the cultural autonomy program, which was 20.5% more than 2022. See Annual ombudsperson's Report for 2023, p. 134. According to the authorities, in 2025, overall allocation of funds was EUR 9 710 000.
[121] For the 2026 cultural autonomy programmes, national minority associations and institutions received €12 486 362 - which was 10% more than 2025 - announced at the 112th session of Croatia's Council for National Minorities, which remained below the €18 million requested. The largest share went to Serbs (€2 584 100), followed by Hungarians (just over €2 million), Italians (€1.5 million), Czechs (just over €1 million), Bosniaks (€929 000), Albanians (just under €600 000), and Slovaks and Ukrainians (just under €500 000 each), while other minorities received significantly less. See VIŠE OD DVANAEST MILIJUNA EURA MANJINAMA ZA PROGRAME KULTURNE AUTONOMIJE – nacionalnemanjine.hr.
[122] Phralipen (31 January 2022), The Roma Educational and Cultural Center opened its doors on Museum Night - Phralipen. Marking the events significant to the Roma community, including the International Roma Day, International Romani Language Day and International Roma Samudaripen/Holocaust Remembrance Day at the Uštica Roma cemetery within the Jasenovac Memorial Site, also continued, and enjoyed support of the OHRRNM and other authorities at all levels.

Meanwhile, Serbian cultural centres[123] were established in Glina, Osijek, Slavonski Brod, Udbina and Zagreb to promote the social inclusion of Serbs, enhance the visibility of the Serb minority and support its culture within local communities, as also confirmed by the Advisory Committee's interlocutors. During its monitoring visit, the Advisory Committee also visited the Ukrainian House in Vukovar, the opening of which in 2023 was warmly welcomed by representatives of the Ukrainian national minority. In the same vein, it also had the opportunity to witness firsthand the commendable efforts undertaken to protect and promote the cultural and linguistic identities of persons affiliating with the Italian national minority, during exchanges at the Center for Historical Research in Rovinj.

70. Despite the generally favourable legislative framework and recent developments in the promotion of cultural autonomy, representatives of the Montenegrin national minority highlighted delays in setting up the Montenegrin cultural centre. Furthermore, interlocutors from the Serb national minority expressed regret over the decision of the Council for National Minorities in April 2025 to reduce financial support for their longstanding weekly newspaper "*Novosti*" by 35%.[124] While the representatives of the Council for National Minorities argue that budget allocations are strictly limited to activities related to cultural autonomy,[125] the Advisory Committee understands that the criteria for financing and contracting programmes of national minority cultural autonomy do not stipulate that minority media should deal exclusively with the culture and identity of the minority concerned, but rather contribute to the overall development of the Republic of Croatia.[126] In this regard, "the Advisory Committee recalls that minority media and minority journalists also play a crucial role in societal integration. Article 6(1) of the Framework Convention also underlines the role of the media as a tool for the promotion of intercultural understanding and a sense of solidarity in society. […] Efforts in states parties to promote ethical standards among journalists and media professionals, and to promote media literacy in society more generally, must include minority representatives. Furthermore, it is important for the formation of an open and pluralist media environment that issues of concern and interest to minority communities generally are given weight in the broader public media debate and that persons belonging to such minorities are portrayed as integral members of society, be it in the role of journalists, presenters and/or interviewees."[127]

71. In this regard, the Serb National Council expressed particular concern that "*Novosti*" was the only minority media outlet covering general issues, and including politics[128] that was subject to a reduction in funding[129] and that this budgetary cut took place following public calls by certain politicians to suspend its financing. This concern is compounded by other worrying incidents, including allegations that Serb cultural centres function as "hostile intelligence centres",[130] and, among others, the 2024 cancellation by the mayor of the city of Sinj of an exhibition of photographs depicting Serbian folk customs, co-funded by the Serb National Council. This latter decision was condemned by the Minister of Culture and Media.[131] The Advisory Committee observed that these developments have generated feelings of exclusion and resentment.

72. The Advisory Committee also reiterates that "the creation of suitable conditions for persons belonging to minority groups to preserve and develop their cultures and to assert their respective identities is considered essential for an integrated society".[132] It welcomes the dedicated efforts and the continuous availability of funding supporting national minority activities in Croatia. However, it emphasises the crucial role of these activities in developing intercultural awareness among all communities, and the need for them to involve interaction between different national minorities and the majority population. Furthermore, it is important that such activities include manifestations of national minority cultures beyond their folkloristic aspects, as this broadens wider intercultural understanding among the general population as well as further highlighting minorities' contribution to Croatian history

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[123] The Serb cultural centres currently operate also in Zagreb, Pula, Vukovar, Beli Manastir, Pakrac, Bjelovar, Knin and Zadar. The construction of several additional centres – such as those in Rijeka and Petrinja – began in 2024.
[124] Reportedly, the Serb National Council received EUR 701 900 in 2025, compared to EUR 768 000 in 2024. See Telegram (25 April 2025) Povećana sredstva za manjine, manje za SNV i Novosti (Increased funding for minorities, less for SNV and Novosti).
[125] Telegram (24 April 2025), Savjet za nacionalne manjine: Tjedniku Novosti 200 tisuća eura manje (Council for National Minorities: Weekly Novosti receives €200 000 less).
[126] See Annual ombudsperson's report for 2024, p. 155; Balkan Insight (28 April 2025), Croatian Journalists Condemn Funding Cut to Serb Weekly as 'Censorship' | Balkan Insight
[127] ACFC Thematic Commentary No. 4 (2016), para. 63.
[128] Reportedly, the Council for National Minorities did not reduce the funds for the "*La Voce del Popolo*" (a newspaper of the Italian community), which also writes about general issues. See Al Jazeera Balkans (24 April 2025), Novosti ostaju bez 35 posto subvencija Savjeta za nacionalne manjine (Novosti remains without 35 percent of subsidies from the Council for National Minorities).
[129] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 20.
[130] See Annual ombudsperson's report for 2024, p. 155.
[131] Večernji list (3 September 2024), Obuljen Koržinek osudila Buljevu zabranu izložbe: 'Zgrožena sam! Ne možemo si dopustiti slanje takve poruke Srbiji'-Večernji.hr (Obuljen Koržinek Condemns Bulje's Exhibition Ban: 'I'm Appalled! We Can't Allow Ourselves to Send Such a Message to Serbia).
[132] ACFC Thematic Commentary No. 3, para. 25.

and society. In this context, the Advisory Committee considers that including national minority cultures more fully in the activities of mainstream cultural institutions, and using minority languages in those institutions, could have a positive impact on the quantity, sustainability, economic base and reach of cultural activities related to national minorities. It would also promote intercultural understanding with a view to increasing the appreciation of national minorities and persons affiliating with them in society at large and making them more visible as an integral and valued part of society (see Article 6). Finally, the Advisory Committee strongly underlines that cultural autonomy as stipulated in Croatian legal framework applicable to national minorities must be guaranteed and applied to all national minorities equally. Any decisions regarding budgetary allocations to promote this autonomy should be guided by clear and objective criteria and must remain fully consistent with the spirit of tolerance and intercultural dialogue enshrined in the Framework Convention.

Recommendation

73. The Advisory Committee encourages the authorities to continue providing sustained support for the cultural activities of persons affiliating with national minorities, and, in close consultation with them, to strengthen cultural institutions. Efforts should also be made to raise awareness of these cultures among the general population. The authorities are also invited to support national minority cultures beyond their folkloristic aspects and to recognise their wider contribution as an integral part of Croatian history and society. Budgetary allocations by the Council on National Minorities to promote cultural autonomy should be based on clear and objective criteria, which should be applied equally, while ensuring the effective participation of minority representatives in the decision-making processes regarding these allocations and taking into account diverse minority needs and interests. Effective channels of communication and co-ordination among all relevant actors should also be ensured.

Promotion of intercultural dialogue, mutual respect and understanding (Article 6)

74. The authorities have reported on measures taken to foster intercultural dialogue and promote mutual respect in society by reference to the National Plan for the Protection and Promotion of Human Rights Combatting Discrimination for the period to 2027,[133] its action plans and the Operational Programmes for National Minorities (OPNMs) (see Article 4). In addition, the sixth state report[134] highlights several areas, including efforts to promote Roma culture in line with the National Roma Inclusion Plan (NRIP) (see Article 4), minority language education (see Article 14), as well as the role of public media in showcasing minority cultures (see Article 9).

75. With some exceptions, most representatives of national minorities have acknowledged a generally respectful relationship between the majority population and national minorities. The authorities' efforts to promote the cultural autonomy of national minorities as well as the support provided to national minority associations and institutions, were widely recognised by the interlocutors of the Advisory Committee. Nevertheless, while representatives of national minorities appreciate these positive aspects, they also highlight a persistent lack of awareness among the general public regarding national minorities and their contribution to Croatia's cultural and social fabric. In this regard, the planned national media campaign under the Action Plan on Human Rights for 2025 to raise awareness of the contribution of national minorities to social cohesion is a welcome and timely initiative.[135]

76. The 2024 national survey on attitudes toward foreigners and minorities in Croatia indicates modest progress in promoting a more positive understanding toward individuals affiliating with the Serb and Roma national minorities but nevertheless highlights persistent social distance and deep-rooted stereotypes, particularly against Roma.[136] According to the findings, 23% of respondents perceive Serbs living in Croatia as a threat to Croatian society, while only 34% express support for migrants and refugees.[137] The enduring memory of the 1991-1995 war continues to shape public perceptions towards and relations with the persons affiliating with the Serb minority, who are often portrayed as "aggressors", especially in areas directly affected by the conflict, such as Vukovar, where divisions remain visible and accentuated. By contrast, regions such as Istria demonstrate more inclusive and cohesive interethnic relations - a difference in regional context also noted by the Advisory Committee in its exchanges with

[133] Containing six specific objectives, this National Plan aims at fostering intercultural dialogue and mutual respect by strengthening institutional efficiency in human rights protection, enhancing public awareness of human rights mechanisms, and ensuring effective implementation of minority rights, improving victim support as well as reinforcing measures against hate crimes, and promoting awareness of racism, xenophobia, and intolerance. See National Plan for the Protection and Promotion of Human Rights and Combatting Discrimination for the period to 2027.
[134] See sixth state report, p. 48.
[135] Annual ombudsperson's report for 2024, p. 154.
[136] Župarić-Iljić, D. and Lalić, S. (2024), Stavovi prema strancima i manjinama u hrvatskom društvu: prijetnja, susret, suživot, Center for Peace Studies (in Croatian). 62% of survey respondents agree that Roma "abuse the social welfare system".
[137] The submission by Centre for Peace Studies and Human Rights House Zagreb to the Advisory Committee on 28 May 2025.

representatives of the Serb national minority in Rovinj/Rovigno who reported an overall very positive climate.

77. The Advisory Committee was informed by its interlocutors that hate speech against national minorities and persons affiliating with them remains a persistent concern in the country, including in political discourse,[138] public spaces and online environments.[139] Representatives of the Jewish minority informed the Advisory Committee about an increase in hate speech directed against their community. A significant proportion of hate speech remains linked to the public use of symbols associated with and expressions of sympathy[140] towards the Nazi allied Independent State of Croatia (*Nezavisna Država Hrvatska* - NDH) and the fascist *Ustaša* regime during the Second World War, which continue to be apparent, including during events such as concerts[141] and sports competitions and sports competitions, but also in politics, including in the parliament.[142] The Advisory Committee notes that the Croatian government unequivocally condemned the *Ustaša* regime and its crimes committed during the Second World War, disassociating the current Croatian State from this regime.[143] However, it notes with concern that such manifestations continued to be observed among young people, many of whom are unaware of their historical role and their offensive historical implications. According to the ombudsperson reacting to the recent use of such symbols in August 2025, "it is currently more unclear to citizens than before what is exactly legal and what is illegal, or what will be sanctioned and what will not, related to various symbols and greetings, while some publicly sent messages confuse the public".[144] In Split in November 2025, during the "Days of Serbian Culture", a group of young people disrupted the event and performed the *Ustaša* salute.[145] The Prime Minister strongly condemned this incident,[146] and the police intervened promptly to prevent further escalation.[147] Nonetheless, such acts of hostility against persons affiliating with national minorities subsequently happened in other parts of the country, including in Zagreb.[148] The Advisory Committee has not been informed of any proceedings initiated against the political figures involved in these events. Yet, the Advisory Committee welcomes the decision of the Zagreb Municipal Assembly to ban the use of symbols and expressions of sympathy with the fascist *Ustaša* regime during concerts, rallies and other public events organised in the facilities managed by the municipal authorities.[149] It also welcomes that the government agreed with the Serbian community representatives to provide police protection and other necessary services in order to prevent the occurrence of similar incidents.[150]

78. The Advisory Committee welcomes initiatives aimed at protecting children and young people from hostility and violence. The project "Be a fan, not a hooligan", which promotes tolerance, diversity and fair play, organised over 170 events involving nearly 70 000 participants across the country in 2023-2024. The Advisory Committee commends such efforts, particularly in light of the rising incidence of peer violence among youth,[151] including between children of the Serb national minority and the majority

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[138] UN Human Rights Committee, Concluding observations on the fourth periodic report of Croatia, CCPR/C/HRV/CO/4, 11 September 2024, para. 19; ostBLOG (29 July 2024), Paving the Way to Denial.

[139] Lalić,S and Senta, C. (2023), Narativi mržnje u internetskim medijima i internetskoj komunikaciji u Hrvatskoj (Hate Narratives in Online Media and Online Communication in Croatia) (in Croatian).

[140] Notably the salute "Za dom spremni" ("For the homeland – ready").

[141] AP News (6 July 2025), Croatian singer and fans perform pro-Nazi salute at massive concert | AP News; NewYork Times (24 August 2025), Singer Marko Perkovic's Fascist-Era Salute Evokes a Bloody Time in Croatia - The New York Times.

[142] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 24-25; ECRI's Sixth Report on Croatia (2025), paras. 31-33.

[143] Index Vijesti (14 April 2022), Plenković: NDH je bila fašistička i totalitarna. Nažalost je dio naše povijesti (Plenković: "The NDH was fascist and totalitarian. Unfortunately, it is a part of our history").

[144] Republic of Croatia Ombudswoman (6 August 2025), "The Ombudswoman's Reaction to Recent Examples of the Use of Ustasha Symbols".

[145] Telegram (4 November 2025), Svjedok upada rulje u Splitu: "Nagrnuli su sa svih strana" (Witness to mob attack in Split: "They came from all sides"); Telegram (5 November 2025), Split mora biti prekretnica. Vrijeme je da država šovinističke nasilnike poduči pravom ustavnom domoljublju (Split must be a turning point. It is time for the state to teach chauvinistic thugs true constitutional patriotism).

[146] Novi List (4 November 2025), Plenković: "Ovo je grubo nasrtanje na srpsku manjinu, osuđujem incident. Mi ne toleriramo ustaštvo" (Plenković: "This is a severe attack on the Serbian minority, and I condemn the incident. We do not tolerate Ustašism").

[147] Večernji List (3 November 2025), Plenković najoštrije osudio incident u Splitu: 'Očekujemo da se u što kraćem roku procesuiraju odgovorni' (Plenković strongly condemned the incident in Split: "We expect those responsible to be prosecuted as soon as possible").

[148] Novine (7 November 2025), Ujutro prosvjed Torcide u Splitu. Maskirani muškarci i u Zagrebu, oglasila se policija (Torcida protest in Split this morning. Masked men also in Zagreb, police spoke out).: Index Vijesti (9 November 2025), Torcida prosvjedovala, oglasili se Šuta i policija. Spriječen incident u Rijeci (Torcida protested, Šuta and police intervened. Incident prevented in Rijeka).

[149] Index Vijesti (11 November 2025), Zagreb zabranio "Za dom spremni" na koncertima i javnim događajima (Zagreb bans "Za dom spremni" at concerts and public events).

[150] Jutarnji List (8 November 2025), Božinović: Dobili smo popis, policija će odsad biti na svim tim događajima (Božinović: "We have received the list; from now on, the police will be present at all of these events").

[151] See Joint Submission by the Ombudswoman of the Republic of Croatia in cooperation with the Ombudswoman for Children, Ombudswoman for Gender Equality and the Ombudsman for Persons with Disabilities for the 4th Review of Croatia under the Universal Periodic Review by the UN Human Rights Council, para. 31.

population. It also underlines the importance of such initiatives in strengthening mutual understanding, reducing prejudice and fostering social cohesion.

79. Persons affiliating with the Serb and Bosniak national minorities underlined that they are continuously exposed to manifestations of historical revisionism, the trivialisation of war crimes, and the public glorification of convicted war criminals.[152] In this context, the Advisory Committee takes positive note of the participation of many high-level politicians in the 80th anniversary commemorations of victims murdered during the Second World War at the Jasenovac concentration camp, alongside the representatives of the national minorities who suffered in this camp, including the Jewish, Roma and Serb minorities.[153] In contrast, some steps that had been taken towards a more inclusive remembrance of the past, in particular the 1991-1995 war,[154] seem to have stalled during the sixth monitoring cycle. In this regard, representatives of the Serb minority expressed disappointment that in 2023 and 2024, amid heightened tensions, they refrained from commemorating either Serb or Croat victims in Vukovar for the first time in a decade, ahead of the Day of Remembrance for the Victims of the 1991-1995 war.[155]

80. The Advisory Committee also notes the information provided by the authorities on the current state of 1991-1995 war crimes prosecution.[156] The Serb National Council expressed concern about this process, on account of overly stringent documentation requirements for obtaining victim status, alleged ethnic bias in the application of relevant legislation and the excessive duration of proceedings.[157]

81. Many interlocutors of the Advisory Committee highlighted the ongoing demographic and cultural transformation in Croatia, driven by emigration, rising immigration[158] and labour mobility in general. This trend is partly attributed to population decline, labour shortages and Croatia's increasing appeal to foreign workers[159] - increasingly from Asian countries and particularly in the tourism sector[160] - as also noted by the Advisory Committee during its visit. Several interlocutors informed the Advisory Committee of growing public discontent regarding the recent rise in the number of foreign workers, which at times has led to protests and attacks[161] and has been instrumentalised by certain political actors through anti-migrant rhetoric.[162] This sentiment, shared to some extent even among persons belonging to national minorities, as heard by the Advisory Committee during its visit, reflects the broader challenges of coexistence and integration of the Croatian society.[163]

82. The Advisory Committee notes that Article 6 of the Framework Convention calls for deliberate efforts to foster a climate of mutual respect, understanding and co-operation among all persons in society, where persons affiliating with national minorities are recognised as a valued and integral part of a diverse society. It also reiterates the importance of ensuring "that all segments of society, majorities and minorities alike, are addressed in order for integration strategies to effectively facilitate the formation of societal structures where diversity and respect for difference are acknowledged and encouraged as normal, through recognition, mutual accommodation and active engagement on all sides."[164]

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[152] Examples include contentious public remarks about the Srebrenica genocide, the granting of official honours to persons accused of war crimes, and the widespread display of murals and graffiti portraying war criminals in public spaces. See Serb National Council (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 21-25; ECRI's Sixth Report on Croatia (2025), para. 32.

[153] Croatian Parliament (22 April 2025), State leadership attends commemoration of 80th anniversary of Jasenovac Camp breakout | Croatian Parliament. Jasenovac Camp was an extermination camp established by the NDH's *Ustaša* regime during Second World War. In Jasenovac, the majority of victims were ethnic Serbs, Jews, Roma, and some political dissidents in the NDH.

[154] ACFC Fifth Opinion on Croatia, para. 105; Balkan Transnational Justice (13 April 2021), Intolerance, Hate Speech Persists Against Croatia's Serbs: Report | Balkan Insight.

[155] Serb National Council (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 29-30. This day (18 November) is markedas the "Day of Remembrance for the Victims of the Homeland War and the Day of Remembrance for the Victims of Vukovar and Škabrnja".

[156] See sixth state report, pp. 48-50.

[157] See also UN Human Rights Committee, Concluding observations on the fourth periodic report of Croatia, CCPR/C/HRV/CO/4, 11 September 2024, paras. 11-12.

[158] See statistical data in the European Migration Network (EMN)'s July 2024 factsheet for Croatia.

[159] Budimir, Ana et al., World Bank Group (2025), Leveraging Immigration for Croatia's Prosperity. Croatia has been attracting foreign workers not just from Western Balkan states but also from Nepal, the Phillipines and India. In 2024, more than 206 000 work permits were approved.

[160] N1 (7 March 2025), Istrsko mestece je na nogah: hotelska veriga želi v kamp naseliti tuje delavce (The Istrian town is on its feet: the hotel chain wants to settle foreign workers in the camp).

[161] Jutarnji list (15 September 2025), Novi napad na stranog radnika u Zagrebu: Trojica ga presrela i ukrali mu novac, završio je u bolnici (New attack on foreign worker in Zagreb: Three men intercepted him and stole his money, he ended up in hospital); Index Vijesti (9 November 2025), Prosvjed zbog stranih radnika u Splitu: "Uvode žig zvijeri u desnu ruku ili na čelo" (Protest over foreign workers in Split: "They are introducing the mark of the beast in the right hand or on the forehead").

[162] Petsinis, V. (2025), Croatia's 'new' national conservatives: the 'Homeland movement.' European Politics and Society, pp. 1-14.

[163] In its sixth report on Croatia, the European Commission against Racism and Intolerance (ECRI) also highlighted these challenges and recommended that the authorities draw up an integration and inclusion plan given the rapid increase in number of such migrants arriving to Croatia. ECRI's Sixth Report on Croatia (2025), paras. 52-56.

[164] ACFC Thematic Commentary No. 4 (2016), para. 54.

Furthermore, the Advisory Committee draws attention to the preamble of the Framework Convention, which states that "the creation of a climate of tolerance and dialogue is necessary to enable cultural diversity to be a source and a factor, not of division, but of enrichment for each society." This principle should be reflected and fostered through legislation and policies, ensuring that "all national minority languages and cultures are visibly and audibly present in the public domain".[165] Such representation fosters awareness of society's diverse character and reinforces the sense of belonging for all individuals.

83. As also emphasised in its Fifth Opinion,[166] the Advisory Committee remains concerned about the lack of tangible results in fostering diversity and inclusion, necessary to counter the manifestations of nationalism, historical revisionism, anti-diversity and anti-minority rhetoric in the country. Despite praiseworthy legal and policy safeguards for national minorities, the Advisory Committee regrets that the overall number of measures promoting intercultural dialogue and mutual respect remains limited. In this regard, the Advisory Committee underlines that raising awareness among the majority population about national minorities and the diverse individuals affiliating with them as well as of diverse population of Croatia is of utmost importance. This requires sustained efforts in sports, culture, the media and education. Education, in particular, plays a pivotal role in promoting the social inclusion of persons affiliating with minorities or, conversely, reinforcing negative stereotypes (see Article 12). Additionally, inclusive public discourse, particularly in politics, plays a crucial role in supporting this process. In this regard, politicians should actively strive to promote cohesion, tolerance and coexistence based on mutual respect and understanding.

84. The Advisory Committee is also concerned with the worrying pattern of exclusionary rhetoric, in particular against Serbs and Roma, that persisted in public discourse and political narratives during the sixth monitoring cycle.[167] The use of discriminatory and offensive language by politicians ultimately weakens the state and its institutions. Any hate discourse by politicians or other public figures must be immediately and strongly condemned by senior government officials to ensure that a clear message is sent to the public that this is not acceptable. The Advisory Committee emphasises that mainstream political parties must refrain from and actively counter hostile rhetoric; ignoring it or aligning their discourse with exclusionary narratives normalises intolerance, severely harming and undermining societal integration.

Recommendations

85. **The Advisory Committee urges the authorities to intensify their efforts to promote a spirit of tolerance, intercultural dialogue, mutual respect and understanding among all persons living in Croatia, including the Serbs and the Roma.** This entails disseminating inclusive information to the general public about the significance of intercultural dialogue and the unique contributions of national minorities and persons affiliating with them as integral parts of Croatian society.

86. **The Advisory Committee calls on the authorities to continue to promptly and unequivocally condemn all incidents of hate speech, in particular by political leaders and public figures, and foster intercultural dialogue and a spirit of tolerance and mutual respect among the general public. A comprehensive and inclusive approach to addressing historic events, including a public and unequivocal condemnation of war crimes and those who committed them, irrespective of the ethnicity of the perpetrator or the ethnicity of the victims, is also needed to promote inter-ethnic dialogue.**

Protection from hostility and violence (Article 6)

87. The criminal legislation pertaining to hate speech and hate crime has largely remained unchanged.[168] According to Croatia's contribution to the OSCE-ODIHR hate crime database,[169] (collected and published by the Office for Human Rights and the Rights of National Minorities (OHRRNM)), the police recorded 73 hate crime incidents in 2024, 85 in 2023, 80 in 2022 and 101 in 2021. These cases primarily concerned threats, physical assault and damage to property. The main provision on hate crime remains Article 87 (21) of the Criminal Code which governs aggravating

[165] ACFC Thematic Commentary No. 4 (2016), para. 61.
[166] ACFC Fifth Opinion on Croatia, para. 106.
[167] See also UN Committee on the Elimination of Racial Discrimination (CERD), Concluding observations on the combined ninth to fourteenth periodic reports of Croatia, CERD/C/HRV/CO/9-14, 2 October 2023, paras. 13-14; UN Human Rights Committee, Concluding observations on the fourth periodic report of Croatia, CCPR/C/HRV/CO/4, 11 September 2024, para. 19; ECRI's Sixth Report on Croatia (2025), paras. 29-30.
[168] See sixth state report, pp. 25-27, 29; ACFC Fifth Opinion on Croatia, paras. 109-110.
[169] OSCE-ODIHR, Hate Crime Reporting: Croatia.

circumstance.[170] The available data for 2024 show that 53 cases, out of 73, were motivated by racism and xenophobia, while 2023 data indicate that, out of 61 cases motivated by national or ethnic origin, 27 involved hatred against Serbs, 12 against Croats, seven against Ukrainians, six against Bosniaks, four against Roma, three against Albanians, and one each against Slovenes and Turks.[171]

88. Moreover, while Article 325 (1) of the Criminal Code (incitement to violence and hatred against a group of persons or a member of such a group) appears to be the main remedy against the use of hate speech in the public sphere, in practice, hate speech is often qualified and sanctioned as a misdemeanour. In this regard, the Advisory Committee notes that in 2023, legal amendments raised the maximum fine for "disturbing the peace" with hate-inciting symbols or salutes to €4 000.[172] Online hate speech is subject to sanctions under Article 14 (2) of the Act on Electronic Media. However, information received from the authorities suggests that such sanctions are rarely imposed, with only four such cases in 2024, none in 2023, one in 2022, and none in 2021.[173]

89. In 2021, a revised Protocol for the Procedure in Cases of Hate Crime was adopted, introducing new rules for collecting information on hate speech, hate crimes, and hate-motivated misdemeanours,[174] which the Advisory Committee welcomes. The revised Protocol also provides law enforcement bodies with guidelines for identifying such offences. A Working Group for Monitoring Hate Crimes, comprising representatives from state bodies, academia and civil society, was also set up with a view to overseeing implementation, analysing data and issuing recommendations.

90. According to data collected and analysed by the Serb National Council (SNV), the number of people physically assaulted due to being perceived as belonging to the Serb national minority significantly decreased in 2023 and 2024 (eight and 11 recorded cases, respectively), compared to 2021 (26), and 2020 (21).[175] Many incidents of physical attacks against Serbs have occurred around football matches or other sporting or cultural events, as well as during commemorations of Croatian victims from the 1991-1995 war.[176] Furthermore, incidents of ethnically motivated vandalism targeting the Serb national minority have increased, with 28 cases in 2021, 28 in 2023, and 39 in 2024.[177] These included the destruction of religious sites, cemeteries, monuments and campaign materials - often defaced with anti-Serb messages - along with systematic attacks on tombstones in several Orthodox cemeteries, which the SNV described as attempts to erase visible traces of Serbian culture and life.[178]

91. Several studies and surveys suggest that Roma continue to be the targets of hate-motivated harassment and violence. While the results of the EU Fundamental Rights Agency (FRA) survey[179] indicate a decrease in hate-motivated harassment compared to the earlier survey (16% of respondents in 2021 compared to 31% in the 2016 survey), the persistent trend of high levels of under-reporting of these incidents is worrying. Overall, most Roma victims of hate-motivated violence (81%) did not report the most recent incident to any authority in 2021[180] while only 5% of them reported the most recent

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[170] Aggravating circumstance is applied if a criminal offence is committed on account of "race", colour, religion, national or ethnic origin, language, disability, gender, sexual orientation or gender identity of another person. In addition to this general provision, explicit penalty enhancements for a number of specific crimes in case they were committed out of hatred also exist. See ECRI's Sixth Report on Croatia (2025), para. 45. According to the information provided by the authorities, following legislative amendments in 2024, while the main provision governing hate crime remains the same, amendments have been made to enhance the sanctioning of crimes motivated by prejudice based on certain characteristics (Official Gazette No 36/24), which entered into force on 2 April 2024). Accordinly, the criminal offence of serious bodily injury resulting in death has been revised through the introduction of a qualified form of the offence (Article 120(2) of the Criminal Code), with a more severe penalty in cases of death caused by the commission of qualified forms of the criminal offence such as serious bodily injury, committed out of hatred. Furthermore, the offence of participation in an affray has been supplemented by new Articles 122(2) and (4) of the Criminal Code, providing for more severe punishment in the case of participation in an affray or attack, or the organisation or leadership of a group of three or more persons involved in such acts of violence, where the conduct is motivated by hatred. Article 87 (21) of the Criminal Code, according to which it shall be considered as an aggravating circumstance if a criminal offence is committed on account of race, colour, religion, national or ethnic origin, language, disability, gender, sexual orientation or gender identity of another Person, the Criminal Code also contains explicit penalty enhancements for a number of specific crimes in case they were committed out of hatred.Similary the penalties have been enhanced under new (Article 323a(2) if affray, including those motivated by hatred results in serious bodily injury or death of a person.

[171] Annual ombudsperson's report for 2024, p. 175.

[172] Act on Amendments to the Act on Offenses Against Public Order and Peace, Narodne novine, no. 47/2023.

[173] See similar considerations in Annual ombudsperson's report for 2024, pp. 212-213.

[174] See sixth state report, pp. 23-24; See also Narodne novine, no. 43/2021.

[175] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 25-26; for an overview of cases reported, Serb National Council, Historical Revisionism, Hate Speech and Violence against Serbs in 2023 and in 2024.

[176] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 26. See also ECRI's Sixth Report on Croatia (2025), para. 47.

[177] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 26-27.

[178] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, pp. 27-28.

[179] EU FRA (2022), Roma in 10 European countries – Main results, p. 22.

[180] EU FRA (2022), Roma in 10 European countries – Main results, p. 31. This was also 86% in 2016.

incident of discrimination.[181] In this regard, initiatives such as the one launched by the Međimurje Police Department to ensure safety and promote the social inclusion of Roma can help build trust in the law enforcement bodies, which may, in turn, lead to higher levels of reporting among the Roma.[182]

92. Roma representatives and other interlocutors reported[183] discriminatory policing practices, including ethnic profiling, against Roma and shared their views of the already low levels of trust in law enforcement bodies among this national minority. The EU FRA survey published in 2021[184] revealed that the proportion of Roma who had been stopped by the police (33%) was higher than that among the general population (19%). In its last report, ECRI underlined several shortcomings in addressing this phenomenon, particularly the lack of a legislative framework. In this context, the Advisory Committee refers to ECRI's recent findings and recommendations[185] while also recalling the standards established by the European Court of Human Rights[186] that oblige states to effectively investigate allegations of racial or ethnic profiling during identity checks or any other routine law enforcement action.

93. The authorities informed the Advisory Committee about numerous measures taken at different levels for the effective implementation of the revised 2021 Protocol for the Procedure in Cases of Hate Crime. Among others, in May 2022, the OHRRNM and the Judicial Academy held a seminar on hate crime in Vukovar for judges, police officers and civil society representatives. In 2023, the OHRRNM joined a project[187] uniting key stakeholders in preventing and addressing hate speech and intolerance. Workshops on "Hate Crime, Criminal Offense Investigations, and the Quality of Court Reasoning" for criminal and misdemeanor judges were also organised in 2024 and 2025. The authorities informed the Advisory Committee that as part of its 2026 training programme, the Judicial Academy plans to further organise workshops on hate crime, public incitement to violence and hatred, harassment and discrimination, investigations of criminal offenses and the quality of reasoning in judicial decisions and promoting the right to diversity as well as combating intolerance and hatred. The Advisory Committee takes positive note that hate crime training is integrated across all levels of police education and is a standard mandatory part of the national police curriculum.[188]

94. Despite these positive steps, many of the Advisory Committee's interlocutors expressed the view that the overall impact of measures to prevent and combat acts of hostility and violence needs to be assessed. Furthermore, the effectiveness of the measures has not been assessed against the experiences of the target groups, such as the Roma. The Advisory Committee underlines that understanding the extent to which these measures have been reflected in the experiences of persons affiliating with national minorities is of paramount importance for any further action tailored to their specific needs and interests. The Advisory Committee therefore considers that further measures are needed to ensure a more comprehensive and holistic approach to tackling these phenomena in practice, including through effective consultation with persons affiliating with national minorities.

95. The Advisory Committee also emphasises that it is an obligation of states parties to undertake appropriate measures to protect persons who may be subject to threats or acts of hostility or violence as a result of their ethnic, cultural, linguistic or religious identities and affiliations. States have an obligation to take all necessary preventive measures, as well as to ensure that cases of alleged hate crime and criminal hate speech are effectively investigated.[189] As confirmed by several interlocutors of the Advisory Committee,[190] despite the solid legal framework, bias motivation is not always properly recognised as a hate motivated incident, and such offences are often classified as misdemeanors. The Advisory Committee believes that further efforts are needed to expand and improve the provision of targeted and practical training for members of the relevant law enforcement agencies to better understand and recognise the dynamics of hate crime.

Recommendation

96. The Advisory Committee strongly encourages the authorities to carry out an assessment of the existing measures to prevent and combat acts of hostility and violence. Efforts should continue

[181] EU FRA (2022), Roma in 10 European countries – Main results, p. 30. This was 22% in 2016.
[182] See sixth state report, pp. 30-31.
[183] The submission by Centre for Peace Studies and Human Rights House Zagreb to the Advisory Committee on 28 May 2025.
[184] EU FRA (2021), Your rights matter: Police stops, Fundamental Rights Survey, p. 8.
[185] See ECRI's Sixth Report on Croatia (2025), paras. 90-92.
[186] Wa Baile v. Switzerland, (nos. 43868/18; 25883/21), 20 February 2024; Basu v. Germany, (no. 215/19), 18 October 2022.
[187] The project was entitled "Improvement of Response to Hate Speech through Legal Research, Advocacy and Training".
[188] National frameworks to address hate crime in Croatia | HCRW.
[189] See Recommendation CM/Rec(2024)4 of the Committee of Ministers to member States on combating hate crime; Recommendation CM/Rec(2022)16 of the Committee of Ministers to member States on combating hate speech.
[190] For instance, concerning some cases reported by the SNV, in July 2024, the perpetrators were found guilty by a first-instance verdict, and the verdict cites the ethnicity of the victims as an aggravating circumstance when sentencing, but the attack was not qualified as a hate crime. See Annual ombudsperson's report for 2024, p. 170; See also the submission by the Centre for Peace Studies and Human Rights House Zagreb to the Advisory Committee on 28 May 2025.

enhancing the capacity of law enforcement agencies to effectively identify and address instances of hate speech and hate crime by providing more targeted and practical training on the 2021 Protocol for the Procedure in Cases of Hate Crime with a view to fully implementing it in practice. Concerted action should also be taken to ensure closer co-operation between the police and persons affiliating with all national minorities, in particular the Serb and Roma national minorities, in addressing the under-reporting of hate crimes.

Minorities and media (Article 9)

97. The legal framework[191] for the provision of public television and radio broadcasts in the languages of national minorities has remained unchanged during the sixth monitoring cycle. The national public broadcaster (Croatian Radio and Television - HRT)[192] continues to air two programmes about national minorities on TV *Prizma* (Prism) and *Manjinski mozaik* (Minority mosaic)) as well as on the radio.[193] While regional stations broadcast additional content, some in minority languages, these programmes are produced in accordance with national legislation and HRT's agreements with the government,[194] which require content for national minorities, partly in their respective minority languages, especially in areas with significant minority populations (Italian in Pula/Pola and Rijeka, Hungarian and Slovak in Osijek).[195] The Knin and Dubrovnik regional stations air programmes dedicated to the Serb and Bosniak minorities. Boyash Romanian, German, Ruthenian and Ukrainian have hardly any presence in the broadcast media.[196]

98. The Advisory Committee notes that, while overall content intended for national minorities in HRT programming has slightly increased,[197] the airtime of the specialised programmes *Prizma* and *Manjinski mozaik* has been reduced in recent years, despite the legal obligations.[198] The Council for National Minorities also noted inconsistencies between the commitments set out in the HRT agreement and their practical implementation. It also expressed concern about HRT's limited engagement in promoting events relevant to national minorities, such as the Council's elections, which could help raise public awareness of minority issues through mainstream media and reach a wider audience.

99. The Agency for Electronic Media (AEM) continues to allocate funding from the Fund for the Promotion of Pluralism and Diversity of Electronic Media through public tenders financed by HRT fee revenues. One category of the fund is dedicated to programmes and content for national minorities, with the budget for this activity having remained stable during the sixth monitoring cycle.[199] The Serb national minority, which also runs the newspaper "*Novosti*" (see Article 5), welcomed the AEM's granting of a license for the on-demand service "Audiovisual Production VIDA" in 2022. VIDA distributes content via YouTube, Facebook, and vidatv.hr, and its diverse programming bridges national minority and general-interest themes, fostering understanding and visibility of minority issues.[200]

100. During the exchanges with the Advisory Committee, numerous minority interlocutors, including from Macedonian, Montenegrin and Slovak national minorities,[201] highlighted that persons affiliating with national minorities remain insufficiently and often stereotypically represented in the available media content. Positive stories highlighting intercultural coexistence, achievements, especially by Roma, or national minority cultural contributions are rarely featured, leaving space for stigmatising narratives to dominate public discourse. Furthermore, these persons are largely absent from editorial, reporting and decision-making roles. In this regard, it is regrettable that the "Minorities Editorial Office" at HRT, established in 2023 to include journalists with expertise in minority issues, has not yet become

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[191] See further in ACFC Fifth Opinion on Croatia, para. 149.
[192] See sixth state report, pp. 64-68.
[193] *Prizma*, a 45-minute weekly show covering diverse minority issues year-round, and *Manjinski mozaik*, a 15-minute weekly documentary (except in summer) focusing on individual minority communities and presented in their respective languages. On radio, HRT-HR 1 airs *Multikultura*, a Croatian-language magazine on national minorities.
[194] The latest contract between the Government of the Republic of Croatia and Croatian Radio Television (HRT) was concluded for the period from 1 January 2023 to 31 December 2027.
[195] See sixth state report, pp. 68-70.
[196] See the Committee of Experts of the European Charter for Regional or Minority Languages (COMEX)(2024), Seventh Evaluation Report on Croatia, para. 81.
[197] Based on the additional information provided by the authorities on 23 July 2025, in 2022, HRT broadcasted 6 389 minutes of programming for national minorities, accounting for 1.22% of total airtime - an increase of 23% from 2021. In 2023, this rose to 7 279 minutes or 1.38% of total programming, marking a 13% increase, driven mainly by substantial growth in HRT content and a 79% rise in HTV documentary output. The authorities did not provide any details on the reduction in the airtime of *Prizma* and *Manjinski mozaik*.
[198] Pursuant to Article 18 of the Constitutional Act on the Rights of National Minorities and the Contract between Croatian Radio Television (HRT) and the Government of the Republic of Croatia for the period 2023-2027.
[199] EUR 218 412.14 in 2022; EUR 250 312.14 in 2023; EUR 232 158.78 in 2024 and EUR 213 522.13 in 2025.
[200] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 33. This programming - ranging from informative to documentary- aims at informing the Serb minority and the wider public about political, socio-cultural developments.
[201] See sixth state report, pp. 139-143.

operational. Recruitment was delayed due to an internal reorganisation at HRT, and later suspended to streamline operations.[202]

101. Against this background, while the Advisory Committee welcomes the continued provision of media content in national minority languages by the HRT, it remains concerned by reports indicating that the quantity and quality of media production for persons affiliating with national minorities - as well as the coverage of issues relevant to them and their visibility - remain limited in public media, despite the Advisory Committee's recommendations in its Fifth Opinion.[203] The Advisory Committee reminds the authorities that "it is important for the formation of an open and pluralist media environment that issues of concern to minority communities generally are given weight in the broader public media debate and that persons belonging to such minorities are portrayed as integral members of society"[204] (see Article 6). Minority interests and concerns should be included in regular broadcasts in mainstream media, rather than singled out in occasional programmes. In this context, the Advisory Committee also stresses that an active and diverse media scene, including in minority languages, may considerably influence the sense of belonging and participation of persons belonging to national minorities: "in order for public service broadcasting to reflect the cultural and linguistic diversity within society, it must guarantee an adequate presence of persons belonging to national minorities and their languages […]."[205] Special attention should also be paid to the needs of persons belonging to the numerically smaller minorities in public broadcasting as also recommended in the Advisory Committee's Fifth Opinion on Croatia.[206]

102. Furthermore, the Advisory Committee notes the ongoing lack of dialogue between national minority representatives and public service media management, although the authorities do conduct regular reviews of minority representation in news programmes.[207] In this context, the Advisory Committee considers that efforts are needed to produce high quality media content, including in minority languages, that is attractive to wider audiences, and to ensure that this is broadcast at convenient times,[208] fully accessible, and widely available on demand. The level of demand for such content would need to be established in close consultation with persons affiliating with national minorities. Furthermore, it is essential that media professionals receive training to enhance their awareness and sensitivity to the specific and contemporary needs and interests of persons affiliating with national minorities in Croatia. The latter should be actively involved in preparing and presenting both mainstream and minority-language programmes covering diverse content, such as news, culture, entertainment, and addressing all generations, including children and youth, such as in the example of *Novosti* newspaper produced by the Serb national minority (see Article 5).

Recommendation

103. The Advisory Committee strongly encourages the authorities to actively support the presence of persons affiliating with national minorities, including numerically smaller minorities, and of their languages and cultures, in the mainstream public media, notably by considerably increasing the quality and quantity of programmes adapted to their needs and interests, as well as by increasing the content produced by and for them. Furthermore, adequate training opportunities should be provided for media professionals and journalists to enhance their awareness of and sensitivity towards the specific and evolving needs and interests of persons affiliating with all national minorities, including through their active involvement in the preparation and presentation of media programmes. In this regard, appropriate measures should be taken for the full and effective functioning of the "Minorities Editorial Office" at the Croatian Radio and Television (HRT) without any further delay.

Use of minority languages in contacts with the administrative and judicial authorities (Article 10)

104. Legal framework guaranteeing the equal official use of national minority languages remained unchanged also during the sixth monitoring cycle. Under this framework, this right is exercised in areas where the national minority constitutes at least one third (33%) of the population, where such use is provided for by international treaties, or where it is stipulated in local self-government statutes in accordance with national legislation. According to the results of the 2021 census, persons affiliating with a particular national minority constituted more than one third of the population in 24 out of 556 local self-government units in Croatia. These included persons affiliating with the Serb national minority in

[202] See Government of the Republic of Croatia – Office for Human Rights and Rights of National Minorities: Report on the Implementation of the Operational Programmes for National Minorities for the period 2021–2024, for 2023, p. 32.
[203] ACFC Fifth Opinion on Croatia, para. 161.
[204] ACFC Thematic Commentary No. 4 (2016), para. 63.
[205] ACFC Thematic Commentary No. 3 (2012), para. 41.
[206] ACFC Fifth Opinion on Croatia, para. 162.
[207] HRT publishes annual reports on produced, co-produced and broadcast programmes intended for informing persons belonging to national minorities in the Republic of Croatia.
[208] ACFC Thematic Commentary No. 3 (2012), para. 41.

20 units,[209] and with the Czech, Hungarian Italian and Roma minorities in one unit each,[210] compared to 27 such units recorded in the 2011 census.[211]

105. According to the 2021 census, the proportion of certain national minorities fell below one third of the total population in four local self-government units: the Serb minority in Donji Kukuruzari, Vrbovsko and Vukovar,[212] and the Slovak minority in Punitovci. Despite falling below the threshold, Vrbovsko and Punitovci retained the option to maintain bilingualism, which the Advisory Committee welcomes. Conversely, amendments to the statutes of the City of Vukovar in 2022 and the Municipality of Donji Kukuruzari in 2023 repealed the statutory decision on the exercise of equal official use of the Serbian language and Cyrillic script. These decisions were met with serious concern by the representatives of the Serb minority.[213] The Advisory Committee also welcomes the reversal of the 2021 decision[214] abolishing the use of the Czech language in the Municipality of Dežanovac - a decision that had been strongly criticised by the Czech national minority[215] - and notes with satisfaction that the equal official use of Czech language was reintroduced in 2024.

106. The possibility of introducing a minority language and script into equal and official use, even where the respective national minority represents less than one third of the population, has been most extensively applied with regard to use of the Italian language in the Istria region.[216] During its visits to Novigrad/Cittanova and Rovinj/Rovigno, the Advisory Committee closely observed the voluntary introduction of bilingualism through city statutes, as well as its effective and successful implementation and the extent to which it has permeated the everyday lives of the local community.

107. While the use of minority languages in judicial proceedings is possible, interlocutors indicated that, in practice, persons affiliating with national minorities rarely exercise this right, as also confirmed by the data provided by the authorities.[217] The Advisory Committee was also informed that this is largely because most of the persons in question are also fluent in Croatian, making such procedures in that language more convenient.

108. The Advisory Committee notes information from the authorities indicating that, in several municipalities, different minority languages are used in official communication with local authorities in accordance with statutes of the local self-government unit[218] and that a shared understanding that these languages are known and may be spoken has been established. While commending this flexible approach, the Advisory Committee underlines that lesser-used languages may require targeted measures and active promotion to ensure their everyday use and visibility in the public sphere. It regrets, in this context, that Romani still remains outside the scope of application of the European Charter for Regional or Minority Languages, despite the Advisory Committee's previous recommendation.[219]

109. The Advisory Committee recalls that "language rights are effective only if they can be fully enjoyed in the public sphere. In assessing demand and existing needs, states should also take into account the specific local situation. 'Need' in this context does not imply the inability of persons belonging to national minorities to speak the official language and their consequent dependence on services in their minority language. A threat to the functionality of the minority language as a communication tool in a given region is sufficient to constitute a 'need' in terms of Article 10(2) of the Framework Convention."[220] Arrangements must be in place to maintain and protect services in the minority language, even if these are not widely used, as they may otherwise disappear from the public sphere. Furthermore, the Advisory Committee reiterates that "states should give careful consideration to the setting up of thresholds for determining the areas inhabited by persons belonging to national minorities in substantial numbers and welcomes measures taken by the authorities to lower any such thresholds as appropriate".[221] The Advisory Committee has also called on applying numerical thresholds particularly in bigger cities where

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[209] Biskupija, Borovo, Civljane, Dvor, Erdut, Ervenik, Gračac, Gvozd, Jagodnjak, Kistanje, Krnjak, Markušica, Negoslavci, Plaški, Šodolovci, Trpinja, Udbina, Vojnić, Vrhovine and Donji Lapac.
[210] Persons affiliating with the Czech minority in the Municipality of Končanica, the Hungarian minority in Kneževi Vinogradi, the Italian minority in Grožnjan/Grisignana, and the Roma minority in Orehovica. See also sixth state report, pp. 72-75.
[211] The Serb minority fell below the threshold in three units.
[212] Based on 2021 census, the Serb minority represents 29.73% in Vukovar, 31.20% in Donji Kukuruzari and 32.38% in Vrbovsko.
[213] The use of Serbian is limited to local self-government units where Serbs are majority of the population, such as in the municipalities which are part of the Joint Council of Municipalities. In these places, Serbian and the Cyrillic script are used by local councils in the documents and in providing written replies. COMEX (2024), Seventh Evaluation Report on Croatia, para. 99.
[214] Annual ombudsperson's report for 2022, p. 112.
[215] See also sixth state report, pp. 84-85.
[216] This is also manifested in the number of administrative procedures which was most exercised in the towns of Istria County (Rovinj/Rovigno, Buje/Buie and Umag/Umago) and in the Municipality of Negoslavci.
[217] See sixth state report, pp. 75-79.
[218] These units are in Istria county and Bjelovar-Bilogora county. See the list in MIN-LANG (2025) IRIA 3 Information Document on the implementation of the Recommendations for Immediate Action, Submitted by Croatia in September 2025, p. 22.
[219] ACFC Fifth Opinion on Croatia, para. 97. This reservation is on the Article 7.5. of the ECRML.
[220] ACFC Thematic Commentary No. 3 (2012), para. 56.
[221] ACFC Thematic Commentary No. 3 (2012), para. 57.

a national minority is unlikely to meet even a smaller numerical threshold measures as a share of the population, but may still exist in substantial numbers and be able to meet a certain absolute number. Where thresholds exist, flexibility and caution in their application are expected, particularly in the context of demographic changes that push some languages (slightly) below the required threshold.[222]

110. Recalling the Committee of Ministers Recommendation in 2024,[223] the recent findings of the Committee of Experts of the European Charter for Regional or Minority Languages (COMEX)[224] as well as its previous recommendations,[225] the Advisory Committee considers that the one-third (33%) legal threshold required for the equal official use of minority languages remains excessively high. Recalling its well-established jurisprudence, the Advisory Committee states that while the requirement that a minority should constitute a majority in a given area to enjoy guarantees under Article 10(2) is incompatible with the FCNM, thresholds of 20% have been consistently found to be compatible with the provision and 10% quotas of relevant population have been particularly welcomed. Moreover, even when the threshold of 33% is met in Croatia, there is no legal mechanism to ensure its implementation, as illustrated by the Municipality of Orehovica, where the Roma population exceeded one third according to the 2021 Census, yet the Boyash Romanian language has not been introduced into equal official use.[226] Furthermore, many persons affiliating with national minorities stated that the voluntary introduction of minority languages into equal official use by local self-government units is not sufficiently promoted by the central authorities. As a result, in many areas where persons affiliating with national minorities represent less than 33% of the population but have a substantial number of speakers, these languages have yet to be granted equal official status. The Advisory Committee also recalls that issues related to the use of Cyrillic scripts concern not only the Serb national minority but also have repercussions for numerically smaller national minorities, such as Bulgarians, Macedonians, Ruthenians and Ukrainians.

Recommendations

111. **The Advisory Committee reiterates its recommendation included in the previous Opinions and again urges the authorities to lower substantially the minimum threshold (33%) for the equal official use of national minority languages and scripts in local self-government units, and to ensure that the relevant legal provisions are duly implemented by all local authorities and supported by effective mechanisms to ensure implementation. The authorities should promote the voluntary introduction of national minority languages into equal official use by local self-government units.**

112. The Advisory Committee strongly encourages the authorities to lift the reservation with respect to Article 7.5 of the European Charter for Regional or Minority Languages, and to actively promote the use of minority languages in contacts with administrative authorities, particularly at local level and for numerically smaller minorities.

Use of personal names and display of signs and topographical indications in minority languages (Article 11)

113. The Advisory Committee notes that identity cards continue to be issued also in the languages and scripts of national minorities, with the largest take-up being among persons affiliating with the Italian minority. In 2024, 3 868 identity cards were issued in Italian, 103 in Serbian, 52 in Czech, 29 in Hungarian, six in Russian and four in Slovak. In 2023, these numbers were 5 711 in Italian, 154 in Serbian, 83 in Czech, 41 in Hungarian, and six in Slovak and in 2022, 3 871 identity cards were issued in Italian, 143 in Serbian, 69 in Czech, 46 in Hungarian and four in Russian.[227]

114. In April 2024, the Government of Croatia reported that, "among the 24 municipalities where national minorities exercise the right to equal official use of their languages and scripts, only eight have explicitly regulated bilingual or multilingual traffic signage in their statutes, as required by secondary legislation. In the remaining municipalities, the relevant provisions are formulated in general terms and do not specify implementation in line with the Instruction and the Act on the Use of Languages and Scripts of National Minorities."[228] For example, in 2023, there were 25 traffic signs in Czech in eight

[222] ACFC Thematic Commentary No. 3 (2012), para. 57.
[223] Recommendation CM/RecChL(2024)2 of the Committee of Ministers to member States on the application of the European Charter for Regional or Minority Languages by Croatia.
[224] COMEX (2024), Seventh Evaluation Report on Croatia.
[225] ACFC Fifth Opinion on Croatia, para. 169.
[226] Annual ombudsperson's report for 2024, p. 159.
[227] Annual ombudsperson's report for 2024, p. 160.
[228] See Government of the Republic of Croatia – Office for Human Rights and Rights of National Minorities: Report on the Implementation of the Operational Programmes for National Minorities for the period 2021–2024, for 2023, p. 6.

settlements, 20 in Hungarian in five settlements, four in Slovak in one settlement, three in Serbian in one settlement and 104 in Italian in 28 settlements.[229]

115. During the exchanges with the Advisory Committee, the authorities confirmed that this uneven implementation of legislation persists, and the application of the act continues to vary (see Article 10), mostly depending on the degree of social cohesion and the level of mutual respect between persons affiliating with national minorities and the majority population. The situation remains particularly favourable with regard to the use of Italian on signs and in topographical indications, as also noted by the Advisory Committee during its monitoring visit. However, the display of such signs and indications continues to be an issue, in particular for the Serbian language and Cyrillic script, including in local government units whose statutes stipulate the right of equal use of minority languages and scripts. For instance, with the exception of Donji Lapac, bilingual boards are still not in place even in municipalities where the Serb national minority makes up over 90% of the population.[230] During the Advisory Committee's visit to Vukovar, Serb national minority representatives expressed their concern over the continued refusal of relevant authorities to display street names and public building signs in the Serbian language and Cyrillic script, even when the Serb national minority met the 33% threshold, and the adverse impact of this threshold on overall social cohesion (see Article 10).

116. The Advisory Committee recalls that "topographical indications in minority languages contribute to the maintenance of the local linguistic and cultural heritage and raise awareness of local national minorities, conveying the message that a given territory is shared in harmony by different ethnic groups."[231]

117. The Advisory Committee considers that displaying more signs and topographical indications in minority languages would constitute an affirmation of the long-standing presence of national minorities in Croatia as an integral part of the society. This would also contribute to the maintenance of the local linguistic and cultural heritage and raise awareness of national minorities locally. In this context, the Advisory Committee underlines that the one-third (33%) legal threshold required for the equal official use of minority languages remains excessively high. It further notes the importance of consistently using minority languages on place name signs and of taking effective measures to ensure the full implementation of the relevant legislation in practice, so that the linguistic landscape reflects the diverse character of the areas where persons belonging to national minorities reside, both traditionally and in substantial numbers.

Recommendation

118. While noting the need to lower the minimum threshold (33%) in order to ensure effective access to minority rights enshrined in Article 11 of the Framework Convention, the Advisory Committee reiterates its call on the authorities to fully implement the existing legal framework concerning the display of street names and indications on public buildings in minority languages and scripts without further delay. The authorities should promote voluntary introduction of national minority languages into equal official use by local self-government units. The effective implementation of the existing legal framework should be achieved by raising awareness among, and providing training for, local officials. In implementing these obligations, the authorities should conduct close consultations with the representatives of both national minorities and the majority population.

Intercultural education and knowledge about national minorities (Article 12)

119. The authorities continue to implement the National Plan for the Development of the Education System,[232] which includes "improving education of children and students of national minorities" among its ten goals to be achieved by 2027.[233] Since 2020, a cross-curricular "Civic Education" programme for primary and secondary schools has covered three domains: i) human rights; ii) democracy; and iii) society. Placing particular emphasis on the European and intercultural dimensions, it aims to help students navigate diversity, build confidence and engage effectively in democratic life.[234] Several interlocutors underlined that its impact is limited because of insufficient teaching time, reliance on individual teacher or school initiatives and very few training opportunities for teachers, leading to uneven, sporadic, and non-obligatory implementation across the regions.[235] Research suggests that contested historical narratives, combined with differing views about the content and purpose of civic

[229] Annual ombudsperson's report for 2023, p. 137.
[230] Annual ombudsperson's report for 2022, p. 112 and Annual ombudsperson's report for 2023, p. 137.
[231] ACFC Thematic Commentary No. 3 (2012), para. 67.
[232] National Plan for the Development of the Education System until 2027 (in Croatian).
[233] Eurydice (2024), National Education Systems – Croatia, 13. Ongoing reforms and policy developments.
[234] Eurydice (2024), National Education Systems – Croatia, 12.4. Other dimensions of internationalisation in early childhood and school education.
[235] Hornstein-Tomić, C. and Kurilić, M. (23 April 2023), Mapping Civic Education in Europe: Croatia - Ratiu Forum; Annual ombudsperson's report for 2024, pp. 89-90.

education, further compounds the issue.[236] The Advisory Committee is not aware of any official evaluation of the implementation of civic education, or of the extent to which national minorities are covered by this subject in practice.

120. As part of the OPNM 2021-2024, the authorities informed the Advisory Committee about research conducted in 2022[237] on the visibility (quantitative representation) and portrayal (qualitative context) of traditional national minorities in primary and secondary school textbooks.[238] The research covered four national minorities - Hungarian, Italian, Roma and Serb. According to the findings, overall representation of minorities in textbooks was found to be limited. Mentions of minorities were mainly collective, abstract or historical. The Serb national minority was the most frequently referenced, followed by Roma, Italian, and Hungarian national minorities. The Serb minority was included most often although ethnicity was not emphasised in 38% of cases and 15% of these references were negative portrayals. While Roma were largely presented free of stereotypes, they were portrayed mostly through the inclusion of non-Croatian figures, with 42% of references lacking ethnic identification. Hungarian and Italian minorities were underrepresented, appearing mainly in historical conflict contexts, with negative portrayals in 28% and 23% of cases respectively. Minority women were rarely mentioned, and Roma women were entirely absent. The research found that few textbooks applied a multiperspectivity approach, and also underlined a persistent gap between curricular goals and how these are actually implemented. This is especially so as regards the Croatian language curriculum, which tends to focus on fostering Croat identity rather than inclusion.

121. During their exchanges with the Advisory Committee, representatives of other national minorities, in addition to those already covered in the OPNM research, expressed concerns that national minorities are often either absent or inadequately represented in educational content and textbooks, contributing to a broader lack of societal awareness about them. Interlocutors were additionally concerned that the limited presence of national minorities in educational materials is largely confined to historical narratives, rather than reflecting the contemporary life of the communities concerned and persons affiliating with them. The Advisory Committee emphasises the central role of education in fostering intercultural awareness across the society as a whole. In this regard, it reiterates the importance of "adequate information on the composition of society, including national and other minorities […] form[ing] part of the public curriculum and of textbooks and education materials used in all schools throughout the territories of states parties".[239] It therefore stresses the need for the authorities to promote intercultural dialogue, including within school curricula, so as to sensitise pupils and students to the presence of national minorities and, as far as possible, endeavour to promote dispassionate treatment of painful historical events. In this context, the Advisory Committee highlights the importance of teacher training, the key role played by history teaching in fostering integration and critical thinking, and the knowledge of cultures, histories and religions of the minorities and of the majority.

122. The Advisory Committee further reiterates that "curricula and educational materials must aim to value diversity, nurture respect for difference, and seek to develop analytical and critical thinking skills and that they are therefore key to raising awareness of national minorities and persons belonging to them. The absence of national minorities from curricula and educational materials contributes to their invisibilisation in public life".[240] The Advisory Committee underlines that "curricula and educational materials should also take into account the diversity within minority communities" with a view to avoiding "the perpetuation of negative stereotypes, […] while combating prejudice, superficial or oversimplified images and folklorisation of minorities and persons who affiliate with them."[241] Furthermore, the Advisory Committee underlines "the need for multiple perspectives in history teaching, to reflect appreciation of and encourage critical reflection on different perspectives, grounded in methodologically rigorous and independent historiography". Practice has shown however that history teaching may be an increasingly fraught, contested and challenging aspect of education.[242] "The Advisory Committee therefore pays close attention to how these events are taught and how persons belonging to national minorities feature within these histories."[243] In this sense, and with the aim of fostering a shared civic identity, states should engage with different competing historical narratives and debunk those that are

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[236] Slavkova, L. and Kurilić, M. (2023), Great Expectations - Demands and realities of civic education in Europe, pp. 20-21.
[237] Stjepanović, D. (2022), An Analysis of the Representation of National Minorities in Textbooks and Curriculum Documents of the Republic of Croatia, (Analiza predstavljanja nacionalnih manjina u udžbenicima i kurikularnim dokumentima Republike Hrvatske), (in Croatian) Office of the Deputy Prime Minister of the Republic of Croatia.
[238] The study analysed 115 textbooks across subjects including Croatian Language, History, Geography, Ethics, Art, Music, Nature and Society, and Politics and Economy (Croatian language – 32, History – 24, Geography – 17, others – 42).
[239] See ACFC Thematic Commentary No. 1 (2024) on education under the Framework Convention for the Protection of National minorities, adopted on 31 May 2024, revising and replacing Thematic Commentary No. 1 (2006), para. 18.
[240] ACFC Thematic Commentary No. 1 (2024) on education under the Framework Convention for the Protection of National minorities, adopted on 31 May 2024, revising and replacing Thematic Commentary No. 1 (2006), para. 25.
[241] ACFC Thematic Commentary No. 1 (2024), para. 26.
[242] ACFC Thematic Commentary No. 4 (2016), para 34.
[243] ACFC Thematic Commentary No. 4 (2016), para 35.

based on fraudulent sources or claims. Multiperspectivity as an approach should also be included in educational materials and be part of teachers' pre- and in-service training.[244]

123. The Advisory Committee acknowledges the authorities' efforts in promoting knowledge of national minorities. However, it regrets that educational materials remain largely sporadic and insufficient about Croatia's national minorities and persons affiliating with them. Teachers are neither systematically prepared to teach about national minorities nor well informed about minority rights. Given the increasing global emphasis on the need to teach respect for diversity, the Advisory Committee is of the view that all pupils and students in Croatia, regardless of where they live and how dispersed the national minorities may be, should have an adequate knowledge about all of Croatia's national minorities and its diversity in general. Content should also not be limited to historic and folkloric depictions, but also reflect the contemporary life of minorities and persons affiliating with them, and portray them as internally diverse communities. Furthermore, the Advisory Committee recalls that age-appropriate teaching about the histories of national minorities should be included at all levels of the education system.[245] Quality history education is essential for fostering a democratic culture. In this respect, the Advisory Committee strongly encourages the authorities to join in the work of the Council of Europe Observatory on History Teaching in Europe, which provides data through general and thematic reports, offers a platform for knowledge exchange and factual discussion, and promotes the sharing of good practices and successful models on history teaching.[246]

Recommendation

124. The Advisory Committee requests the authorities to ensure that information about minority cultures, traditions, histories, religions and languages, including about numerically smaller minorities and persons affiliating with them, and about their integral and valued role in Croatia's diverse society, is systematically included in school curricula, in educational materials and in accompanying teacher training. The authorities should also ensure that educational materials and teacher training adopt a multiperspective approach to history teaching. All teachers should receive pre- and in-service training in human rights, including minority rights, in order to effectively and sustainably promote intercultural education within the school environment.

Equal access to education - Roma (Article 12)

125. The authorities reported several measures to ensure the inclusive education of Roma pupils.[247] These consist of the support provided by the Ministry of Science, Education and Youth to Roma students through scholarships,[248] including for students repeating a year, free accommodation in student dormitories, and one-time financial assistance for completing secondary education. A major portion of the measures - 23 out of 58 - outlined in the 2023-2025 Action Plan for the implementation of the National Plan for Roma Inclusion (NRIP) 2021-2027 is also dedicated to education.

126. According to the authorities, progress has been made in improving the educational outcomes of Roma children across all age groups. However, the number of Roma students enrolled in secondary education remains low. In the 2023/2024 school year, a total of 7 055 Roma children and students were enrolled in the education system: 1 081 in kindergartens, 5 230 in primary schools, but only 744 in secondary schools, despite positive measures for better enrollment having been put in place.[249] In higher education, enrollment has increased, with 55 Roma students receiving state scholarships in 2024. Regardless of these measures, structural challenges - including high levels of early school leaving and low preschool participation - continue to hinder progress and contribute to regional disparities. Roma civil society and independent institutions have repeatedly raised concerns about the long-term implications of these systemic failures on inclusion and equality.

127. During the sixth monitoring cycle, preschool enrolment has risen notably, supported by fully state-funded programmes, universally free preparatory education and a growing number of investments by local authorities[250] into such schools. Nevertheless, only 23% of Roma children aged three to six were

[244] ACFC Thematic Commentary No. 1 (2024), para. 36.
[245] ACFC Thematic Commentary No. 1 (2024), para. 38. See also Recommendation CM/Rec(2020)2 of the Committee of Ministers to member States on the inclusion of the history of Roma and/or Travellers in school curricula and teaching materials.
[246] ACFC Thematic Commentary No. 1 (2024), para. 41. See also Resolution CM/Res(2020)34 of the Committee of Ministers confirming the establishment of the Council of Europe Enlarged Partial Agreement on the Observatory on History Teaching in Europe and The Observatory on History Teaching in Europe - Observatory on History Teaching in Europe.
[247] See sixth state report, pp. 96-99.
[248] €132 per month.
[249] When enrolling in secondary schools, Roma students receive additional points in the admission process.
[250] In Međimurje county, almost all relevant municipalities in 2023–2024 were expanding their kindergarten/preschool infrastructure and in the period from 2022 to 2024, an amount of €11 843 124 was allocated for the construction and extension of kindergartens in several municipalities and towns (e.g. Goričan, Mala Subotica, Nedelišće, Pribislavec, Strahoninec, Orehovica, Podturen, Hodošan and Čakovec), with a significant Roma population and expected to accept around 1 000 children.

enrolled in preschool in 2023, against a 2025 target of 30%.[251] Furthermore, although scholarships, dormitory support, and extended school programmes have improved the situation, dropout rates among Roma remain critically high, with nine out of ten early school leavers belonging to the Roma national minority and only 30% of Roma youth aged 15-18 remaining in education.[252] In this regard, the Advisory Committee notes the vital role played by Roma assistants in schools but expresses concern about their precarious status, the absence of formal job profiles and training for them, as well as the Ministry of Science, Education and Youth's limited mandate to institutionalise these roles which hinders their expansion across the country. Reportedly, there were 24 Roma assistants employed in primary schools in 2024.[253]

128. School segregation remains a sensitive and systemic issue. The Advisory Committee recalls that the segregation of Roma children in schools has been raised as a concern in its previous opinions.[254] Although the sixth state report lacks detailed information on this matter, the Advisory Committee understands that the authorities have introduced a range of measures aimed at eliminating segregation and promoting inclusive education. These measures include co-financing transport for Roma children from segregated settlements to integrated kindergartens and schools, as well as co-financing parental contributions for Roma children in integrated preschool settings, both of which have had limited impact. According to interlocutors, this reflects Roma parents' concerns about potential discrimination in mainstream schools, limited awareness of the benefits of desegregation,[255] a lack of recognition of the importance of early education as well as the reluctance of local authorities to actively implement these measures due to fears of a negative reaction from the majority population.[256] Access to preschool education is further constrained by limited kindergarten capacity and enrolment policies that favour employed parents. The authorities informed the Advisory Committee about the new Action Plan for Roma Inclusion 2026-2027, which includes the preparation of a comprehensive analysis of the situation of the Roma community, the development of guidelines and recommendations at the national, county, municipal and school levels, as a basis for further planning and policy decision-making. Nevertheless, during their exchanges with the Advisory Committee, educational professionals and local authority representatives expressed a shared view on the significant impact of preschool education in improving the overall educational outcomes of Roma children. In this regard, the Advisory Committee underlines the importance of outreach, awareness-raising, and trust-building with persons belonging to the Roma national minority as well as the active engagement of local authorities to ensure the effective implementation of inclusive education measures.

129. The Advisory Committee deplores the fact that, despite the measures introduced, segregation remains widespread. According to the Ministry of Science, Education and Youth, in the 2024/2025 school year there were 85 classes where Roma children were taught either in fully segregated settings or were significantly overrepresented.[257] Among 24 elementary schools with the highest numbers of Roma pupils surveyed by the ombudsperson's office in 2023, 11 also operated "Roma-only" classes - 80 in total, attended by around 950 Roma children. The proportion of Roma pupils in special education programmes is also disproportionately high, with 50% enrolled compared to 10% of the general population. [258] The situation is particularly concerning in Međimurje county,[259] where 56% of Roma pupils attend Roma-only classes. Most interlocutors and researchers link segregation to multiple factors, primarily housing or spatial segregation. The reluctance of non-Roma parents to enroll their children in schools with many Roma pupils is also commonplace. Concerns were also raised that a

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[251] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 24.
[252] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 24.
[253] UN Committee on the Elimination of Racial Discrimination (CERD), Information received from Croatia on follow-up to the concluding observations on its combined ninth to fourteenth periodic reports, CERD/C/HRV/FCO/9-14, 7 January 2025, para. 53.
[254] See ACFC Fourth Opinion on Croatia, para. 68; ACFC Fifth Opinion on Croatia, paras. 186-190.
[255] For example, the initiative to finance transportation for Roma children to more distant educational institutions for ensuring desegregation were rejected by the Roma community in the 'Josip Rimac' settlement in Slavonski Brod. Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 23.
[256] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, pp. 23-24 and 30.
[257] Annual ombudsperson's report for 2024, p. 166.
[258] See the Submission of the ombudsperson to the UN Committee for the Elimination of Racial Discrimination for the Consideration of the Follow-up to the Concluding Observations to the Combined Ninth to Fourteen Periodic Report of the Republic of Croatia, January 2025, paras. 9-10. The ombudsperson data suggests that in schools with both integrated and segregated classes, average grades are consistently higher in mixed settings - and highest where few or no Roma pupils are enrolled - raising concerns about the quality of education received by Roma children.
[259] UN Committee on Economic, Social and Cultural Rights, Concluding observations on the second periodic report of Croatia, E/C.12/HRV/CO/2, 10 March 2025, paras. 50-51. Data indicates that the situation is better in other regions. For instance, in Istria, Vukovar-Srijem and Zagreb counties, Roma children are fully integrated into classes where the majority of pupils are non-Roma children. In the City of Zagreb, Sisak-Moslavina county, Koprivnica-Križevci county and Osijek- Baranja county – the share of children attending integrated classes ranges from 90.2% to 95.9%. See National Plan for Roma Inclusion 2021-2027 , p. 27.

pending legislative proposal transferring full authority over school catchment areas to local governments could weaken existing safeguards against segregation. Furthermore, although foreseen in the 2023-2025 NRIP Action Plan, the Advisory Committee regrets that no analysis of the current state of segregation has been conducted, nor has an Action Plan for Desegregation been adopted to date.[260]

130. During its visit to Croatia, the Advisory Committee noted positively that at a primary school in Orehovica,[261] sustained investment in infrastructure, the engagement of Roma assistants, and the dedication of the school's management and teachers to fostering inclusion have led to inclusive classes and to above-average educational outcomes among Roma pupils.[262] Furthermore, the Advisory Committee welcomes the joint initiative of civil society and several municipalities to establish "play hubs," where children not enrolled in kindergarten can play and participate in learning activities. Open both to Roma and to children from the majority population, these centres foster inclusion and language development, while also supporting families through parent meetings and homework assistance for school-age children. The Advisory Committee views the play hubs as examples of good practice. During its visit to a play hub in Pribislavec, the Advisory Committee observed firsthand their positive impact on Roma pupils and the wider community, particularly in improving Croatian language skills among children who often have limited proficiency in the official language of instruction before entering primary school, as well as in enhancing overall learning outcomes.

131. The Advisory Committee reiterates that segregation in education "adversely impacts the integration of society as a whole by maintaining divisions between individuals and communities."[263] "Segregation in education […] is a form of discrimination that prevents equal access to education, and in particular to quality education for all. Segregated educational institutions tend to provide low-quality education and to have higher drop-out rates and worse academic outcomes. This has knock-on effects concerning access to employment, healthcare, housing and participation in the social, cultural and public life of a country. In the Advisory Committee's view, segregation affecting Roma […] and other communities in a socio-economically disadvantaged situation can have a particularly stigmatising effect. Reinforcing cycles of exclusion and marginalisation in society and further contributing to antigypsyism and other forms of racism, segregation both results from and perpetuates the social exclusion of those affected by it and must be comprehensively tackled – even in situations where, for various reasons, it has been chosen by persons belonging to these minorities."[264]

132. The Advisory Committee also underlines that, "regardless of the manifold reasons for segregation, authorities have a positive obligation to adopt a comprehensive and holistic approach to end educational segregation, including situations that lead to it, such as housing or spatial segregation as well as racist bullying in schools" with the provision of concrete measures to eliminate it.[265] An effective way to address this is by fostering an education environment that not only ensures equal access to rights but also is respectful and appreciative of diversity within the school population. Lastly, the Advisory Committee recalls that in cases where authorities refer to the "voluntary" nature of segregation and view it as a matter of parental choice or minority "demand", no waiver of the right not to be subjected to racial discrimination can be accepted and further recalls the importance of the justiciability of the right to education in line with the case law of the European Court of Human Rights (ECtHR).[266]

133. Finally, the Advisory Committee reiterates that "[e]nsuring access of all persons belonging to national minorities to quality education means that states need to act resolutely to, *inter alia*, ensure that all children are duly enrolled in schools and to monitor school attainments, including absenteeism and drop-out rates, literacy, completion of studies, grades, gender disparities, access to higher educational levels and subsequently access to employment."[267]

134. While the authorities have taken measures to improve equal access to education for Roma, particularly to address systemic segregation, and regularly collect gender disaggregated data to monitor the school attainment and educational outcomes of Roma pupils and students, the Advisory Committee regrets the absence of a comprehensive assessment of these persistent issues and the lack of targeted measures to effectively end segregation and improve Roma children's educational attainment. Many Roma children still grow up with limited interaction with non-Roma peers, reinforcing social divisions. It

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[260] Annual ombudsperson's report for 2024, p. 166.
[261] This school was the subject matter of the judgement of the European Court of Human Rights in *Oršuš and others v. Croatia* (no. 15766/03) in which a violation of Article 14 taken together with Article 2 of Protocol No. 1 of the Convention was found by placing Roma children in segregated classes due to their limited Croatian language skills. The Committee of Ministers closed the case in November 2017 after general measures were implemented (Resolution CM/ResDH(2017)385).
[262] See other promising examples in UNESCO (2025), Global education monitoring report 2025, regional edition, Central and Eastern Europe the Caucasus and Central Asia: lead for inclusion, p. 41.
[263] ACFC Thematic Commentary No. 1 (2024), para. 20.
[264] ACFC Thematic Commentary No. 1 (2024), para. 59.
[265] ACFC Thematic Commentary No. 1 (2024), para. 63.
[266] ACFC Thematic Commentary No. 1 (2024), para. 61.
[267] ACFC Thematic Commentary No. 1 (2024), para. 50.

also acknowledges that segregation is a complex, multifaceted issue, requiring time, sustainable funding and trust-building with Roma communities, particularly involving children and parents. While desegregation remains the ultimate goal, continuous and well-monitored efforts are needed to ensure inclusive and high-quality education for all.

Recommendations

135. **The Advisory Committee calls on the authorities, in close co-operation with parents and Roma minority representatives including women, to take further steps to develop and implement measures to end school segregation, such as a comprehensive desegregation policy with clear targets, sufficient resources, precise timetables and a monitoring mechanism for its implementation.** Educators working with Roma pupils and students should be provided with ongoing training and supported to improve attendance rates and educational outcomes and prevent dropouts, including by promoting the value of education.

136. **The Advisory Committee calls on the authorities to assess the current situation regarding the access of Roma to quality education and implement long-term sustainable measures, in co-operation with Roma representatives, schools, parents and students, to improve their access to such education, including secondary school education.** The authorities should continue the regular collection of gender disaggregated data and the monitoring of school attainment and educational outcomes of Roma pupils and students, with particular attention to Roma girls. Policies should be aligned to ensure their equal access to education at all levels and to promote equal educational outcomes. This process should be carried out in consultation with Roma representatives, including young people and women, and a broader range of stakeholders, including education professionals who directly work with them.

Teaching in and of minority languages (Article 14)

137. As stated in the previous opinions,[268] Croatia maintains a well-developed system of minority language education structured around three models: i) Model A schools (all tuition in minority languages with compulsory learning of the Croatian language), ii) Model B schools (bilingual education, with natural sciences taught in Croatian, and social sciences in a minority language), and iii) Model C schools (all tuition in the Croatian language with an additional two to five school hours intended for nurturing the language and culture of the national minority). A total of 16 out of 22 national minorities can receive education in their own language and script.[269] According to information provided by the authorities,[270] in 2024 there were 3 447 pupils in Model A, 25 in Model B, and 3 382 in Model C schools across 229 primary schools. At the secondary school level, there were 1 130 students in Model A, 27 in Model B, and 303 in Model C across 32 schools in the country.[271]

138. The Advisory Committee notes that minority language education is available from pre-school to secondary level in Czech, Hungarian, Italian and Serbian. However, there is no such continuity for other minority languages. Model A remains the most widely applied model in secondary education, particularly among the Italian, Serb and Hungarian national minorities. There is also significant interest among students whose first language is Croatian, especially in Model C schools at both the primary and secondary levels, as education under any of the minority teaching models is available to all students, regardless of whether they belong to a national minority. This trend was also observed in Novigrad/Cittanova where many Croatian speaking pupils were attending such schools in Italian. In the view of the Advisory Committee, educational establishments like these schools are not only important for the teaching of or in the minority language under Article 14 of the Framework Convention but are also a good example of the provision of intercultural education, as they provide a learning space where students interact constructively with each other and thus contribute to societal integration[272] in line with Article 12 of the Framework Convention.

139. The authorities informed the Advisory Committee that a total of 67 kindergartens provided education for children from 11 national minorities in 2024. During its exchanges with the Advisory Committee, representatives of the Slovene minority regretted the unavailability of preschool education in their language. The Advisory Committee notes that Boyash Romanian, Istro-Romanian[273] and

[268] ACFC Fourth Opinion on Croatia, paras. 77-78; ACFC Fifth Opinion on Croatia, paras. 201-202.
[269] Six remaining national minorities are the following: Bosniaks, Montenegrins, Ruthenians, Romanians, Turks and Vlachs.
[270] See sixth state report, pp. 86-96 and additional information provided on 23 July 2025.
[271] In 2023, there were 3 559 pupils in Model A, 34 in Model B, and 3 422 in Model C schools across 217 primary schools, while these numbers for 2022 were 3 515 pupils in Model A, 34 in Model B and 3 374 in Model C in 211 schools.
[272] ACFC Thematic Commentary No. 1 (2024), paras. 17-18.
[273] Istro-Romanian (also known as "*vlaški*" and "*žejanski*") has not been included in the formal education system of the Republic of Croatia as a teaching language under Model C. The language has historically been present in parts of Istria and the number of its speakers is in decline.

Ruthenian are also not used in preschool education.[274] In its 2024 report, the COMEX noted the very limited availability of preschool education in minority languages, regretted that only a few are used at this level, and stressed the importance of early childhood education for developing language competences.[275]

140. Representatives of the Roma minority highlighted the importance of Boyash Romanian, the most commonly used language of Roma in Croatia, which lacks a standardised written form and was only introduced into the education system in 2020.[276] Both Boyash Romanian and Romani are taught under Model C, which signifies an important step towards recognising Roma linguistic and cultural identity. Model C education in this language is currently provided to about 70 Roma students in three primary schools in Međimurje country.[277] The Advisory Committee was pleased to observe this firsthand during its visit to the Orehovica Primary School (see Article 12). There are also state supported exemplary projects, such as Gimme five! (*Dă-m sins!*),[278] which develop extra-curricular programmes aimed at preserving the language and culture of the Boyash Romanian in elementary schools, allowing Boyash Roma pupils to nurture a positive identity whilst continuing to learn their first language and culture.

141. Special forms of education (summer schools) and programmes have been financed for Czech, Hungarian, Ruthenian, Serbian and Ukrainian, while special programmes have been financed for German, Italian, Slovak and Slovenian.[279] During the monitoring visit, representatives of the Ukrainian minority commended the summer schools, which combine lectures, sports and cultural activities, and have attracted strong interest among primary and secondary school pupils.

142. While the Advisory Committee's interlocutors expressed their overall satisfaction with the existing framework for teaching in and of minority languages, concerns have been raised by some national minorities. For example, representatives of the Serb minority regretted that the longstanding issue[280] of re-registering primary schools as Model A Serbian-language schools in the county of Vukovar-Srijem remains unresolved, as the county has yet to act on the requests of the municipalities of Borovo, Negoslavci and Markušica to transfer the founding rights of these schools to their respective local government units. The Advisory Committee takes positive note that the OPNM 2024-2028 includes a specific measure to address this issue. The Albanian minority expressed dissatisfaction with the limited availability of Model B education and the absence of Model A education in the Albanian language. The Italian minority in the Istria county also reiterated their request to introduce Italian as a mandatory subject to fully implement bilingualism and recognise it as a language of the social environment in the entire county.

143. The Advisory Committee's interlocutors further highlighted persistent challenges, most notably, the shortage of qualified teachers in minority languages, especially for Boyash Romanian, Romani and Slovenian. In this context, it welcomes the recently introduced teacher programme in the Romani language in Čakovec. There is also a shortage of Serbian language teachers, particularly under Model C, a situation which has worsened as the result of the retirement of staff.[281] This is also true for the Italian language, which faces additional scarcity because many teachers trained in Italy do not return to Croatia after completing their studies. In this regard, the Advisory Committee takes note of measures adopted in this area, such as in-service training for teachers, which are supported by the Agency for Education and Teacher Training. The Advisory Committee also welcomes the Ministry of Science, Education and Youth's provision of textbooks and materials for students taught in national minority languages. For example, in 2023, substantial funds[282] supported the creation, translation and review of textbooks in Czech, Hungarian, Italian and Serbian. While most textbooks in national minority languages are produced in Croatia, schools may also use approved textbooks from the relevant "kin-states". The shortage of teachers and the development of textbooks nevertheless remain more challenging for smaller, more geographically dispersed minorities, such as the Ruthenians, Slovenes, Ukrainians, for which providing these resources is more difficult.

144. The Advisory Committee reaffirms its view that one of the purposes of minority language education is to "maintain or inculcate a degree of fluency and literacy that enables the learner to use the language both in public and private life and to pass it on to the next generation".[283] It also underlines the importance of the continuity of the offer of minority language education, from preschool through to

[274] COMEX (2024), Seventh Evaluation Report on Croatia, para. 39.
[275] COMEX (2024), Seventh Evaluation Report on Croatia, para. 39.
[276] This was made possible with the 2020 Curriculum for the Subject Language and Culture of the Roma National Minority.
[277] In schools in Kuršanec, Orehovica, and Podturen.
[278] "GIMME FIVE! – DĂ-M ŚINŚ!" - Pučko otvoreno učilište - Korak po korak
[279] See sixth state report, pp. 100-101.
[280] ACFC Fourth Opinion on Croatia, para. 77; ACFC Fifth Opinion on Croatia, para. 204.
[281] Annual ombudsperson's report for 2024, p. 161.
[282] i.e. EUR 652 475. See Government of the Republic of Croatia – Office for Human Rights and Rights of National Minorities: Report on the Implementation of the Operational Programmes for National Minorities for the period 2021–2024, for 2023, p. 19.
[283] ACFC Thematic Commentary No. 1 (2024), para. 87.

university and adult/continuing education. Moreover, it is essential that the authorities do not take a purely passive approach but actively stimulate the demand, which need to be regularly monitored, for education in a minority language through "awareness-raising among parents and young people, and the promotion of existing possibilities for minority language teaching."[284] Minority language education also requires qualified teachers and in-service training, both of which warrant systemic support from the authorities. In this connection, the Advisory Committee also notes that "[t]he lack of a sufficient supply of educational materials negatively impacts the quality of the education offered to minority children and adds barriers to the interest pupils, students and parents may have when deciding whether to choose minority language education."[285] Finally, the Advisory Committee underlines that "the learning of a minority language should always promote the perception of belonging to the civic community and of minorities as an integral part of the society they live in. In this vein, states bear the responsibility to produce good-quality teaching and learning materials in consultation with persons affiliating with minorities and to regularly update them."[286]

145. The Advisory Committee welcomes the considerable efforts by the authorities to support the teaching in and of minority languages. It positively notes information provided by the authorities that the government finances the procurement of materials for public libraries in the languages of minorities and scripts as well as informal minority language learning programmes. However, disparities exist in terms of different minority communities' access to such education.[287] A key concern is the lack of robust mechanisms to assess the educational outcomes of the existing provision, which hampers the ability to track progress or to respond effectively to linguistic needs. Specific minority needs and interests are not regularly assessed and high-quality domestically produced educational materials are not ensured for all persons affiliating with each minority. The provision and promotion of such education among national minorities require regular assessment of demand, adequate resources and continuous efforts to address the shortage of qualified teachers, including through systematic investment in teacher training and relevant pedagogical resources.

Recommendations

146. **The Advisory Committee reiterates its calls on the authorities to allow minority schools conducting instruction in Serbian language and Cyrillic script to re-register according to the model A in the county of Vukovar-Srijem, in line with the applicable legislation.**

147. The Advisory Committee strongly encourages the authorities to continue to support the provision of minority language education for persons affiliating with national minorities. The authorities should collaborate with national minority representatives, educational institutions and municipalities to assess the demand for such education, and to ensure that its organisation is feasible and attractive for pupils/students and families. Furthermore, additional resources should be allocated to the production of high-quality and up to date educational materials, including for digital learning, and to improving the availability and training of teachers. The authorities should introduce measures to raise awareness of and incentivise the learning of minority languages, including the Romani and Boyash Romanian languages, when demand exists.

Effective participation in public affairs and decision-making processes (Article 15)

148. The Advisory Committee has discussed in its previous Opinions the details of the legal frameworks concerning the effective representation of national minorities in public administration[288] and their participation in elected bodies and decision-making at national[289] as well as at local and regional levels,[290] which have remained unchanged. The Advisory Committee also notes that the interests and perspectives of national minorities are voiced through the Council for National Minorities (see Article 5),[291] an advisory body established in accordance with the Constitutional Act on the Rights of National Minorities. The council consists of 20 members appointed by the government, including eight members of parliament and representatives of national minority associations "of some distinction". Although the council operates effectively and provides opinions on various matters, its role remains largely limited to the distribution of cultural funding.[292]

149. With regard to representation in public administration, the Advisory Committee notes that, in accordance with legal obligations, persons belonging to national minorities should be guaranteed

[284] ACFC Thematic Commentary No. 3 (2012), para. 71; ACFC Thematic Commentary No. 1 (2024), para. 108.
[285] ACFC Thematic Commentary No. 1 (2024), para. 116.
[286] ACFC Thematic Commentary No. 1 (2024), para. 118.
[287] See also the relevant findings of COMEX (2024), Seventh Evaluation Report on Croatia on different minority languages.
[288] ACFC Fourth Opinion on Croatia, paras. 89-91; ACFC Fifth Opinion on Croatia, paras. 232-237.
[289] ACFC Fourth Opinion on Croatia, para. 82; ACFC Fifth Opinion on Croatia, paras. 212-219.
[290] ACFC Fourth Opinion on Croatia, para. 84; ACFC Fifth Opinion on Croatia, paras. 225-231.
[291] See Membership of the Council for National Minorities.
[292] ACFC Fifth Opinion on Croatia, paras. 220-224.

employment in state administration bodies and judicial institutions in proportion to their share of the total population at the level at which each body is established. In practice, however, this remains a challenge and persons belonging to national minorities continue to be significantly underrepresented in these institutions. According to the latest data provided by the authorities, as of 31 December 2024, a total of 47 655 civil servants and employees were employed in state administration bodies, professional services, and offices of the Government of the Republic of Croatia, of whom 1 348 or 2.83% were persons belonging to national minorities.[293] Their share in overall employment has been steadily declining over the past decade.[294] An analysis of the legal framework indicates that the right of preference for employment under equal conditions has only a symbolic effect, rendering this provision largely ineffective in achieving proportional representation.[295] In this context, data reviewed by the Serb National Council show that between 2020 and 2023, only 11 persons belonging to national minorities were employed in the civil service, government offices and the judiciary based on the exercise of this preferential right.[296]

150. With regard to political participation in the national parliament, the Advisory Committee notes that eight parliamentary seats remain reserved for representatives of national minorities, three of which are to be filled by representatives of minorities who represent more than 1.5% of the population, i.e., by the Serb national minority, and five to be elected in a special suffrage by persons who are registered as belonging to a national minority.[297] Several interlocutors also informed the Advisory Committee that, following the parliamentary elections held in 2024, representatives of the Serb national minority are no longer part of the ruling majority. Traditionally, the eight members of parliament representing national minorities have been considered natural partners of the government.

151. In exchanges held during the Advisory Committee's visit, representatives of national minorities almost unanimously expressed the view that each minority should have its own representative in parliament. Alternatively, they suggested that the parliamentary seat shared by several minorities - particularly those that are numerically smaller, such as Macedonians - should rotate among them on an annual basis to ensure equal and effective participation. Furthermore, the Roma and Bosniak national minorities, who do not have their own member of parliament but share representation with eleven and four other national minorities respectively, questioned the representativeness of the current system, particularly given that they are the second- and third-largest national minorities after the Serb minority. The Advisory Committee also noted a degree of resentment among persons belonging to national minorities regarding the absence of dual voting rights, which means that they must choose whether to take part in the general election as any other citizen or they wish to vote as a registered member of a national minority (listed in from a special voting register).

152. With regard to the political participation of national minorities at the local level, their representation is provided through local and regional self-government units (minority councils)[298] - whose elections are held separately from the general local elections. The most recent election of minority councils took place in May 2023 and resulted in the election of a total of 339 councils and 105 representatives of national minorities. These are consultative bodies that advise the regional or local authorities and make proposals on how to improve the situation of national minorities. However, turn-out at elections for these councils has been traditionally very low, on average around 10%. Several interlocutors noted that local and regional minority councils have only a limited degree of influence over local authorities' decision-making processes. Representatives in these councils expressed concern about limited consultation and information, noting that their input is largely confined to occasional verbal contributions. They emphasised the need for greater support to strengthen their substantive influence. In this context, the Advisory Committee emphasises the crucial role that municipalities play in ensuring the inclusion of

[293] Serb national minority accounted for the largest share – 839 of them, accounting for 1.76% of the total number of employed persons; followed by 80 Hungarians and 80 Italians, accounting for 0.17% each; Bosniaks – 74 or 0.16%; Czechs – 70 or 0.15%; Albanians – 40 or 0.08%; Slovenes – 27 or 0.06%, and Roma –10 or 0.02%, while 128 civil servants and employees, or 0.27%, declared themselves as persons belonging to other national minorities. Based on the additional information provided by the authorities on 23 July 2025.

[294] The breakdown for the monitoring period is as follows: 2.92% in 2023, 3.01% in 2022, 3.03% in 2021 and 3.07% in 2020. Based on the additional information provided by the authorities on 23 July 2025.

[295] SNV Bulletin #24: Unrealised Rights and Failed Policies 3: Representation of National Minorities in the State Administration, Judiciary, and Police, p. 23; Annual ombudsperson's report for 2024, p. 158.

[296] Serb National Council (SNV) (2025), The Alternative report on the implementation of the Framework Convention for the Protection of National Minorities in the Republic of Croatia for the period 2020-2025, p. 49.

[297] The list of member of parliament (MPs) representing national minorities who were elected in the May 2024 parliamentary elections is available. In the current composition, there are three MPs representing the Serb national minority, one MP representing the Czech and Slovak national minorities, one MP representing the Italian national minority, one MP representing the Hungarian minority, one MP representing the Albanian, Bosniak, Macedonian, Montenegrian and Slovene national minorities and one MP representing the Austrian, Bulgarian, German, Jewish, Polish, Roma, Romanian, Ruthenian, Russian, Turkish, Ukrainian, Vlach national minority. The Advisory Committee notes that only two MPs are women and therefore invites the authorities to apply incentives for promoting gender balance in the representation of national minorities in parliament.

[298] Službene stranice Državnog izbornog povjerenstva Republike Hrvatske - Elections for council members and national minorities representatives.

minorities as the key actors at the forefront of identifying the gaps in addressing the needs and interests of these minorities. Establishing effective channels of co-operation between local and regional minority councils and local authorities and creating synergies between these actors are essential.

153. National minorities are also entitled to one seat in the local councils through the general local elections[299] if they constitute between 5% and 15% of the population;[300] if their share of population exceeds 15%, this number is increased, and they are further granted the right to hold an executive position, usually that of a deputy mayor. However, minority deputy mayors generally play a symbolic role, with limited representational functions on issues concerning national minorities, rather than being actively involved in local policy- or decision-making. On a positive note, following the local elections in May 2025,[301] the first deputy mayor of the Roma national minority in Croatia was elected in Međimurje county. By-elections for local self-government were called in October 2025 for 75 minority representatives that were not elected in May 2025.[302] Overall, reports[303] indicated also a very low voter turnout among persons belonging to national minorities in these elections, averaging 7.5%. In some regions, such as Istria, participation was particularly low - 1.07% among Serbs and 5.18% among Italians.[304] In addition, some concerns were raised about the electoral system for these minority representatives, which has resulted in the near-permanent election of certain long-standing individuals elected by a very limited number of voters (see Article 3). Moreover, these representatives are perceived as being closely aligned with the government, with some interlocutors alleging that they are funded by it.

154. The Advisory Committee reiterates that "[r]epresentation and participation of persons belonging to national minorities in elected bodies […] is an essential but not sufficient condition for effective participation. Their inclusion in elected bodies at different levels largely depends on the constitutional traditions and guarantees provided for by electoral legislation. The choice and modalities of the electoral system often has a direct impact on the effectiveness of minority participation in decision-making."[305] In this regard, the Advisory Committee has noted that "when electoral laws provide for a threshold requirement, its potentially negative impact on the participation of national minorities in the electoral process needs to be duly taken into account."[306]

155. The Advisory Committee also considers that "the 'shared seats' system is particularly adapted to meet the needs of numerically small minorities. For such an arrangement to have a significant impact on the participation of all the national minorities represented through the shared seat(s), it is important that the minorities concerned agree on a common strategy and shared goals to be reached through the representation in the electoral body at stake. Elected representatives occupying shared seats should take due care to represent the concerns of all persons belonging to national minorities in the constituency. A rotation of the representatives of the different national minorities may help create the sense of a shared seat."[307] Furthermore, the Advisory Committee reiterates that "where possibilities for persons belonging to national minorities to be represented in elected bodies are in practice limited, alternative channels, such as specific arrangements to facilitate minority representation, need to be considered in order to enhance their participation."[308]

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[299] Službene stranice Državnog izbornog povjerenstva Republike Hrvatske - Local elections

[300] The Serb National Council expressed satisfaction with a positive measure adopted by the Bjelovar-Bilogora county in favour of persons belonging to the Czech and Serb national minorities. According to the 2021 census, both minorities fell below the legal threshold of 5% of the county population required to attain the right to elect a deputy county prefect: Czechs at 4.91% and Serbs at 4.87%. Nevertheless, in December 2024, the county assembly amended the County Statute to guarantee both minorities the right to elect one representative to the county assembly and one deputy county prefect at the 2025 local elections.

[301] A total of 67 mayors and county executives were elected across 65 units of local and regional self-government- specifically, in 56 local and nine regional units. By national minorities, persons affiliating with the Serb minority elected 34 deputies; the Italian minority, 14 deputies; the Hungarian and Roma minorities, five deputies each; the Czech minority, four deputies; the Bosniak and Ruthenian minorities, two deputies each; and the Slovak minority, one deputy. Based on the additional information provided by the authorities on 23 July 2025.

[302] Narodne novine, no. 113/25. On 5 October 2025, there were repeated elections in 63 units (at 474 election places) of local self-government for 75 minority representatives that were not elected in May 2025. These elections were for empty seats for the Serb, Roma, Italian, Hungarian, Slovak, Ruthenian, Ukrainian and Bosniak national minority) and for Croats where they are in a minority situation. In May 2025, persons belonging to national minorities elected 273 members of representative bodies. By national minorities, persons belonging to Serb national minority elected a total of 156 members of the representative bodies of self-government units; the Italian minority 40 members; Roma 24; Hungarian minority 19; Bosniak minority 13; Czech minority 11; Slovak minority four; Ruthenian minority three; and members of the Albanian, Ukrainian and Slovene minorities were entitled to one member each.

[303] Vijesti HRT (5 October 2025), Dopunski izbori: Izrazito slab odaziv birača (By-elections: Extremely low voter turnout).

[304] Lokalni izbori 2025. (Local elections 2025).

[305] ACFC Thematic Commentary No. 2, The effective participation of persons belonging to national minorities in cultural, social and economic life and in public affairs, adopted on 27 February 2008, para. 72.

[306] ACFC Thematic Commentary No. 2 (2008), para. 82.

[307] ACFC Thematic Commentary No. 2 (2008), para. 92.

[308] ACFC Thematic Commentary No. 2 (2008), para. 87.

156. The Advisory Committee regrets that, despite its previous recommendation,[309] there is still no evidence of regular and adequate evaluation of the effectiveness of support provided to all minority councils and representatives, aimed at ensuring their effective participation in local and regional decision-making processes. Furthermore, the Advisory Committee considers that the current framework for the parliamentary representation of national minorities does not fully meet their present needs and interests. Consultations with relevant stakeholders are necessary to identify and address potential shortcomings of the existing reserved seat system. While the allocation of eight reserved parliamentary seats is a welcome measure to promote minority participation, further dialogue is needed to ensure that the system guarantees equal and effective representation of all national minorities and does not disadvantage numerically smaller minorities. In this regard, the Advisory Committee underlines that the right to political participation for persons belonging to national minorities should be practical and effective. Moreover, parliamentary representation should not be seen as the exclusive means of implementing Article 15 of the Framework Convention.[310] Given the extremely low turnout in elections concerning minority representation, which undermines the democratic legitimacy of these processes, measures should also be taken to encourage greater participation of persons belonging to national minorities and to ensure that their representative bodies function effectively.

Recommendations

157. The Advisory Committee strongly encourages the authorities to promptly address the shortcomings in the current system of reserved parliamentary seats for national minorities, through full and effective consultation with their representatives, in line with the standards provided by the Framework Convention. Any approach taken should consider the need to respect equal opportunities and diversity within national minorities and any future measure should be implemented through effective and inclusive consultation.

158. The Advisory Committee reiterates its recommendation to regularly check whether local and regional government units are meeting their legal obligations to support all minority councils and representatives effectively. The authorities should promote the participation in minority council elections and make sure that these councils have enough resources to take part meaningfully in local and regional decision-making.

Effective participation in social and economic life: access to employment – Roma (Article 15)

159. Although the NRIP 2021-2027 provides for a range of measures to promote employment among the Roma, including those to reduce the overall employment gap, address gender inequalities, and improve the situation of Roma youth who are not in employment, education or training, the Roma population remains significantly underrepresented in the labour market. According to NRIP baseline data, 63.3% of Roma youth are neither in employment, nor education or training, compared to only 14.2% of the general population.[311] In addition, in 2024, 90.6% of unemployed persons belonging to the Roma national minority had no formal education, had not completed primary school, or had only completed primary school.[312] This highlights the importance of encouraging and supporting the education of Roma children (see Article 12) and of addressing systemic barriers - including limited access to higher education - which should remain a priority in order to break the cycle of economic disempowerment.

160. The authorities informed the Advisory Committee that, at the end of December 2024, a total of 3 084 persons belonging to the Roma national minority were registered as unemployed with the Croatian Employment Service (HZZ), accounting for 3.37% of the total unemployed population. Of these, 54.7% were women, while the largest share (48.0%) were individuals aged between 30 and 49. Most Roma-targeted interventions are managed by the HZZ and implemented through general employment measures, such as career guidance and early school-leaving prevention, upskilling and requalification, subsidised employment through the co-financing of wages and internships, and self-employment support. Although the HZZ allocates a dedicated budget for Roma,[313] no employment measures are specifically tailored to their needs. In this context, while taking positive note of the emphasis placed on the gender employment gap in the NRIP 2021-2027, the Advisory Committee regrets that no activities have yet been planned or implemented under this measure.[314] Furthermore,

[309] ACFC Fifth Opinion on Croatia, para. 231.
[310] ACFC Thematic Commentary No. 2 (2008), para. 87.
[311] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 26.
[312] Annual ombudsperson's report for 2024, p. 168.
[313] Amounting to EUR 1.7 million in 2023 and EUR 2.2 million 2024. The overwhelming majority (over 90%) is spent on public works. Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 27.
[314] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 26.

considering the high levels of discrimination against Roma in recruitment processes,[315] the Advisory Committee notes with concern that the targeted measure aimed at outreach to employers in areas where there is a significant Roma presence was never implemented and was eventually excluded from the NRIP 2023-2025 Action Plan.

161. The Advisory Committee notes that while the employment rate of Roma has increased during the sixth monitoring cycle, this improvement is attributed primarily to the general shortages in the Croatian labour market. [316] The public works scheme has remained the most used employment measure, [317] but is omitted from the action plans on NRIP. Managed primarily by local self-government units, and often also available to associations and (local and regional) councils of Roma national minority, the public works schemes relies heavily on Roma labour without offering sustainable paths out of poverty. While such schemes may help reduce long-term unemployment, they rarely facilitate lasting entry into the primary labour market with their low-skilled jobs requiring no qualifications. As a result, public works schemes risk fostering dependency, with Roma repeatedly participating without gaining new skills or support for sustainable employment. This perpetuates reliance on welfare and reinforces socio-economic exclusion, rather than promoting genuine economic integration. Furthermore, the Advisory Committee understands that the public works scheme continues to face criticism, including anonymous complaints of nepotism and corruption. Allegations have been made that the involvement of Roma minority councils and related political pressures have influenced the allocation of employment quotas across counties, undermining trust in the fairness of its implementation among Roma stakeholders.[318]

162. The Advisory Committee reiterates that "[i]n order to promote effective integration of persons belonging to disadvantaged minority groups in socio-economic life, comprehensive and long-term strategies should be designed and implemented. […] Adequate resources need to be provided in a timely manner at all levels of operation, especially locally. Furthermore, the implementation of such policies should be carefully monitored, and their impact evaluated, in close co-operation with representatives of the minorities concerned, with a view to adapting and strengthening them over time."[319] The Advisory Committee further recalls that "[p]ersons belonging to national minorities often live in regions at a distance from political and economic centres of activity. Hence, they can be confronted with more difficult socio-economic situations than the majority population. State Parties should take specific measures to increase the opportunities for persons belonging to national minorities living in peripheral and/or economically depressed areas […] to participate in socio-economic life."[320]

163. Despite observing relative progress in improving employment rates, the Advisory Committee remains deeply concerned about the overall employment situation of the Roma, particularly the heavy reliance on public work schemes, which contributes to their hidden unemployment in the long term. More innovative measures are needed to promote inclusivity in the labour market. These might include, among others, employer incentives, public-private partnerships and other forms of positive action.[321] In this regard, the Advisory Committee welcomes the continuous policy of the Ministry of Interior to increase the enrolment rate of Roma in the Police Academy and recalls that equal opportunities for employment must be ensured in both the private and the public sectors. Nevertheless, the Advisory Committee notes with concern that no comprehensive assessment has been conducted to evaluate the overall impact of existing measures on the economic empowerment of Roma, and that none of these have been specifically tailored to the needs of this community, in particular Roma women and youth who are not in employment, education or training.

Recommendation

164. **The Advisory Committee calls on the authorities to continue conducting a comprehensive assessment of the impact of employment-related measures under the National Plan for Roma Inclusion 2021-2027 on the economic empowerment of Roma. Further efforts should be made to improve employment outcomes for the Roma - particularly in the most disadvantaged regions - and to further strengthen targeted policies for Roma women and youth.** These measures should be developed in close co-operation with persons affiliating with the Roma minority and independent experts, supported by adequate resources, and regularly monitored and evaluated.

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[315] Ombudsperson (8 April 2024), Ombudswoman Submits Report 2023 Annual Report to the Croatian parliament.
[316] Roma Civil Monitor (2025), Croatia: Assessment of the progress in the NRSF implementation between 1 June 2023 – 30 March 2025 (country fiche), p. 5.
[317] See sixth state report, pp. 40-41.
[318] Roma Civil Monitor (2025), Civil society monitoring report on the implementation of the national strategic framework for Roma equality, inclusion, and participation in Croatia, p. 27.
[319] ACFC Thematic Commentary No. 2 (2008), para. 49.
[320] ACFC Thematic Commentary No. 2 (2008), para. 42.
[321] OSCE HCNM Recommendations on effective Participation of National Minorities in Social and Economic Life & Explanatory Note, October 2023, Recommendation 20, p. 52.

Effective participation in social and economic life: access to health – Roma (Article 15)

165. The NRIP 2021-2027 provides for activities aimed at improving the health of Roma, with particular emphasis on women's reproductive health, reducing the life expectancy gap between Roma and the general population, and raising awareness among Roma communities and health professionals about gender-based violence. Additionally, the National Plan for the Protection and Promotion of Human Rights and the Prevention of Discrimination for the Period to 2027[322] stipulates a measure titled Prevention of Inequality in Accessing Healthcare, with a special emphasis on the minority groups protected by the Law on the Prevention of Discrimination and the Law on Gender Equality. Nevertheless, the health indicators for the Roma are significantly lower than those found among the majority population: on average, Roma women live 15.7 years less than women in the general population, and Roma men live 10.7 years less than men in the general population.[323]

166. The authorities reported[324] that in terms of equitable access to health, significant progress has been achieved through both an increasing rate of health insurance coverage[325] and vaccination rates among Roma children, as well as improved collection of disaggregated health data by the Croatian Institute of Public Health. However, the wide geographical dispersal and diversity of the Roma national minority make centrally designed measures less effective than locally tailored initiatives. In this regard, examples of good practice include the Osijek-Baranja county, which facilitates access to compulsory health insurance; the Sisak-Moslavina county Health Centre, which implements the "Program for Roma" - providing home nursing visits, awareness-raising on women's health, and free cancer screenings in co-operation with the General Hospital in Sisak; and the City of Zagreb, which funds the "Health through Education" programme aimed at preventing chronic diseases and improving the reproductive health of Roma women and girls. In Međimurje county, a "Pilot Project for Addiction Prevention" targeting Roma children and youth was implemented in 2022-2023 by the Croatian Institute of Public Health. The Advisory Committee also takes positive note of the fact that, during the sixth monitoring cycle, Croatia was one of the EU member states piloting the *Child Guarantee* project,[326] through which UNICEF Croatia and national and local partners, such as Međimurje county, work to improve access to healthcare, education, care services, housing and nutrition for children in a vulnerable situation, including Roma.

167. Despite these measures, the most pressing healthcare issues among Roma in Croatia continue to be the lack of education on healthcare, the language barrier, harmful behaviour such as smoking and drug use, the lack of public transport to health centres from more remote settlements, and discriminatory practices against the Roma by healthcare professionals.[327] The Advisory Committee welcomes the establishment of family centres in Roma settlements, which help mitigate these challenges and play a pivotal role in raising awareness on general well-being and women's sexual and reproductive health, as exemplified by the Family Centre in Kuršanec settlement where the dedicated staff provided the Advisory Committee with valuable insights. The Advisory Committee's interlocutors also mentioned the persistent practices of early and forced marriages, which are a form of gender-based violence, among the Roma community, particularly affecting Roma girls. In this context, the Advisory Committee refers to the findings and recommendations of the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) on Croatia.[328]

168. The Advisory Committee has concerns about the general healthcare situation of the Roma. It recognises the connection of this issue with social and economic factors, notably housing, education and employment. It is further concerned by limited access to healthcare, including sexual and reproductive health services for Roma women and girls as well as the phenomenon of early and forced marriages. The establishment of more reliable channels of communication between health professionals and Roma women, and the empowerment of Roma women through appropriate counselling services, are essential to address these issues. Finally, the Advisory Committee reiterates that persons belonging to national minorities face particular difficulties in their access to healthcare,

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[322] National Plan for the Protection and Promotion of Human Rights and the Prevention of Discrimination to 2027 (Zagreb, March 2023), pp. 27-31.
[323] EU FRA (2022), Roma in 10 European countries – Main results, p. 48.
[324] Based on additional information provided by the authorities on 23 July 2025.
[325] Reportedly, 11% of Roma still do not have health insurance. See ECRI's Sixth Report on Croatia (2025), para. 82. Furthermore, the Advisory Committee notes that amendments to the Health Insurance Act in 2023 introduced the obligation to visit the Croatian Health Insurance Fund (HZZO) in person for all insured persons from the category of the so-called unemployed at regular intervals. This may place Roma in an unequal position if they are unable to comply due to disability, poor health, or financial constraints, and result in the cancellation of their health insurance coverage.
[326] UNICEF (29 March 2023), Successful implementation of activities in Međimurje as a proof that EU Child Guarantee works.
[327] Sedić B. *et al*,(2024), "Prejudices of Nurses Towards Roma as Patients in the Healthcare System of the Republic of Croatia", Croatian Nursing Journal, Vol. 8 No. 2, pp. 153-167.
[328] Council of Europe, the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO, Baseline evaluation report by GREVIO on Croatia, published on 6 September 2023, paras. 220-221.

which is a key element of participation in socio-economic life,[329] and notes that these difficulties may be exacerbated by persons exposed to intersectional discrimination, such as that based on gender and minority affiliations.

Recommendations

169. The Advisory Committee requests that the authorities ensure effective access to healthcare services for persons affiliating with the Roma minority. They should also provide training to healthcare professionals on inclusion, the prevention of discriminatory bias, and the application of gender-specific and culturally sensitive approaches in the provision of healthcare to persons from marginalised minorities. Furthermore, the authorities should invest in the medical infrastructure and services in areas where persons affiliating with these minorities reside. Adequate attention should be paid to gender-based disparities in healthcare outcomes.

170. The Advisory Committee encourages the authorities to work with Roma representatives and organisations to address gender-based violence against Roma women in a non-stigmatising manner. Efforts should be made to raise awareness of the harmful effects of early and forced marriages.

Effective participation in social and economic life: access to housing – Roma (Article 15)

171. In the area of housing, the NRIP 2021-2027 sets out a wide range of goals, including improving equal access to social housing through access criteria that prioritise social needs; ensuring access to essential services such as tap water, adequate sanitation, and waste collection; monitoring and combating spatial segregation; preventing forced evictions through early warning and mediation; and addressing the negative health impacts of exposure to pollution and contamination. The authorities informed the Advisory Committee that progress has been made through strong investments in the construction of social housing, infrastructure, housing legalisation, and targeted assistance to households in greatest need.[330] For example, in 2023 and 2024, a total of 501 families benefited from various forms of material support for housing construction and 13 local self-governments were funded for spatial planning in municipalities with more than 1% Roma population.[331] Infrastructure was also improved in 25 municipalities, while the construction of social housing was co-financed in the Roma settlements in Slavonski Brod (Brod-Posavina county). Although exact data are not available, according to the authorities, better employment and education opportunities have enabled many Roma families to move from segregated settlements to nearby villages, particularly in Međimurje county.

172. Despite these measures to improve Roma access to adequate housing, the overall situation remains a persistent challenge. Roma continue to live predominantly in Roma-only settlements or segregated urban areas, reinforcing spatial and social segregation. Although the proportion of Roma living in housing deprivation decreased from 69% in 2016 to 55% in 2021 (compared to 13% for the general population),[332] inadequate living conditions continue to severely hamper access to essential public services, such as electricity. As observed by the Advisory Committee in the Kuršanec settlement, overcrowding remains a chronic problem. The EU FRA survey suggests that 84% of Roma still live in households lacking the minimum number of rooms, compared to 36% of the general population.[333]

173. Discrimination against Roma in the housing market is also prevalent, manifesting itself in different forms, such as the reluctance of locals to have Roma as neighbours or the refusal of bank loans based on ethnicity.[334] Moreover, Roma continue to be subjected to forced evictions without the provision of adequate alternative accommodation.[335] Roma interlocutors informed the Advisory Committee that these problems continue to affect Roma to a large extent and remain systemic issues with regard to housing. Many Roma interlocutors indicated to the Advisory Committee that housing policies often focus on improving living conditions within segregated areas, rather than adopting a holistic approach that addresses segregation itself through targeted measures to eliminate it. While efforts to enhance living conditions are generally appreciated, this policy focus inadvertently reinforces the segregation of Roma from the wider population and contributes to their continued isolation in areas such as employment and

[329] ACFC Thematic Commentary No. 2 (2008), para. 61.
[330] See sixth state report, pp. 123-131.
[331] Based on additional information provided by the authorities on 23 July 2025.
[332] EU FRA (2022), Roma in 10 European countries – Main results, p. 52.
[333] EU FRA (2022), Roma in 10 European countries – Main results, p. 54. This is based on the Eurostat definition of overcrowding.
[334] See examples in EELN Report (2025), Country report non-discrimination – Croatia, pp. 55-58.
[335] In the municipality of Drnje, the homes of seven Roma families, including 17 children, were bulldozed by an unknown perpetrator while they were temporarily housed in a local school gym following floods. Meanwhile, in the nearby town of Hlebine, non-Roma residents launched a petition to relocate a newly settled Roma family. See the Submission of the ombudsperson to the UN Committee for the Elimination of Racial Discrimination for the Consideration of the Follow-up to the Concluding Observations to the Combined Ninth to Fourteen Periodic Report of the Republic of Croatia, January 2025, para. 16; Annual ombudsperson's report for 2022, pp. 86-87.

education, which remains a matter of serious concern. In this regard, the Advisory Committee welcomes the examples of successful housing desegregation implemented by the City of Zagreb during the monitoring period, whereby residents of Roma settlements were relocated to integrated housing.[336]

174. The Advisory Committee reiterates that "[s]ubstandard housing conditions, often coupled with the physical/spatial separation of persons belonging to certain national minorities, in particular Roma and Travellers, considerably affect their ability to participate in socio-economic life and can result in their further poverty, marginalisation and social exclusion. This is frequently made more acute by the lack of legal provisions securing their residency rights and by their vulnerability to forced evictions".[337]

175. The Advisory Committee remains concerned that holistic and sustainable measures to improve Roma access to housing are still lacking. This shortfall often results in educational segregation (see Article 12). While the authorities have made some commendable efforts, significant challenges persist. These challenges must be addressed through an integrated approach which offers adequate housing solutions, improves infrastructure and prevents the deepening of socio-economic disparities and poverty. In this context, the active involvement of municipalities, who play a pivotal role in housing for Roma, in the design and implementation of housing policies, as well as their collaboration with Roma local self-governments and the Roma themselves, is essential. The Advisory Committee considers that expanding social housing and prioritising desegregation measures are crucial, as explained in the relevant Council of Europe recommendations that offer guidance on these issues.[338]

Recommendation

176. The Advisory Committee strongly encourages the authorities to continue improving the housing conditions of persons affiliating with the Roma minority. This should include upgrading existing infrastructure and ensuring access to essential services, such as drinking water and electricity. Housing policies should also be integrated with broader desegregation measures, including targeted employment initiatives and efforts to facilitate the social inclusion of Roma. Particular attention should be paid to people in a vulnerable situation, especially families with young children and elderly people.

Cross-border contacts and bilateral co-operation (Articles 17 and 18)

177. According to information provided by the authorities,[339] no new bilateral agreements have been signed in the field of national minority protection during the monitoring period. Croatia has concluded such bilateral agreements with Hungary, Italy, Montenegro, North Macedonia and Serbia. Based on these agreements, Intergovernmental Joint Committees (IJC) monitor implementation and provide recommendations to improve the status, protection and promotion of the identities and cultures of the respective minorities. No IJC meetings have been held concerning the Serb national minority during the sixth monitoring cycle, whereas the committees for the Macedonian and Hungarian national minorities have continued to convene. Representatives of the Montenegrin national minority expressed regret over the suspension of IJC meetings, which they consider instrumental in advancing co-operation, particularly in the field of culture, but the authorities informed the Advisory Committee, the fourth session of the IJC on Montenegrin national minority took place on 15 December 2025. This is exemplified by the planned Montenegrin Cultural Centre, which has not yet materialised (see Article 5). Additionally, on the basis of the 2004 bilateral agreement signed by Croatia and Serbia, an IJC was established, but it has not convened since 2019.

178. In 2022, Croatia and Czechia signed a new Programme of Cultural Co-operation aimed at supporting the preservation of the culture, heritage, language, literature and religion of persons belonging to the Croat minority in Czechia and the Czech minority in Croatia. Furthermore, both Croatia and Slovakia have expressed interest in concluding a bilateral agreement on the mutual protection of national minorities and are engaged in active dialogue on this matter. The Advisory Committee further notes initiatives aimed at the recognition of Croats as a national minority in Slovenia[340] as well as the decision by the Croatian government to designate projects for Croats living outside Croatia, including the construction of a Croatian cultural centre in Ljubljana.[341]

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[336] Roma Civil Monitor (2024). Examples of successful housing desegregation as a precondition of Roma integration, (Edited by Marek Hojsik), pp. 69-74. The City of Zagreb had three Roma settlements: Plinarsko naselje, Struge and Vrtni put. The first two have been desegregated and demolished, while the Roma settlement of Vrtni put still exists.
[337] ACFC Thematic Commentary No. 2 (2008), para. 57.
[338] Recommendation Rec (2005)4 of the Committee of Ministers on improving the housing conditions of Roma and Travellers in Europe; Recommendation CM/Rec(2024)1 of the Committee of Ministers on equality of Roma and Traveller women and girls.
[339] See sixth state report, pp. 132-138.
[340] See sixth state report, pp. 135-136. The Advisory Committee also notes that since 2000, there is a bilateral agreement in the fielf of education between Croatia and Slovenia, which led to a conclusion of a memorandum in 2009.
[341] Vijesti (4 December 2025), Vlada odredila četiri projekta od strateškog značenja za Hrvate izvan Hrvatske (The government designated four projects of strategic importance for Croats outside Croatia).

179. The Advisory Committee welcomes Croatia's efforts at bilateral co-operation and sees a further opportunity to promote relations with neighbouring countries. In this context, the Advisory Committee recalls the principles enshrined in the OSCE HCNM Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations, according to which "[i]n dealing with issues concerning the protection of persons belonging to national minorities, States should be guided by the rules and the principles established in international human rights documents, including those multilateral instruments and mechanisms which have been created specifically to support the implementation of standards and commitments relating to minorities".[342] The Advisory Committee further recalls the view of the 2001 Council of Europe Venice Commission report, stating that "[t]he effectiveness of the treaty approach could be undermined, if these treaties were not interpreted and implemented in good faith in the light of the principle of good neighbourly relations between States".[343]

180. The Advisory Committee emphasises that the protection of national minority rights is a primary responsibility of the state in which national minorities live. The protection afforded and support given to persons affiliating with certain national minorities should not be dependent on the conditions of bilateral relations with another state. Furthermore, the Advisory Committee reiterates that the conclusion of bilateral agreements can serve to strengthen minority protection and contribute positively to the development of cross-border relations. Such co-operation can effectively complement the protection measures the country takes at the national level and support the development of infrastructure of national minorities, particularly in areas such as education (see Article 14) as well as enhance access to right to family visits through liberalised visa regulations.

181. The Advisory Committee welcomes that the authorities use bilateral relations with other states to further the protection of the rights of persons belonging to several national minorities in Croatia. However, national minorities other than the Hungarian, Italian, Montenegrin, Macedonian and Serb minorities do not yet benefit from bilateral agreements. The Advisory Committee encourages the authorities to pursue such agreements, where appropriate. Furthermore, more regular meetings of the IJMs could be beneficial to strengthen further dialogue with neighbouring states, including with minorities not currently represented by an IJC.

Recommendation

182. The Advisory Committee encourages the authorities to pursue good neighbourly relations, including through continued efforts to sign bilateral agreements aimed at providing protection of national minority rights and convene the intergovernmental joint committees on minorities on a regular basis.

[342] See OSCE High Commissioner on National Minorities (2008), Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations, Recommendation 17.
[343] CoE Venice Commission, (2001), p. 22. Rapport sur le traitement préférentiel des minorités nationales par leur Etat-parent, adopté par la Commission de Venise lors de sa 48e réunion plénière (Venise, les 19-20 octobre 2001) - Venice Commission of the Council of Europe

The **Advisory Committee on the Framework Convention for the Protection of National Minorities** is an independent body that assists the Committee of Ministers of the Council of Europe in evaluating the adequacy of the measures taken by the Parties to the Framework Convention to give effect to the principles set out therein.

The **Framework Convention for the Protection of National** Minorities, adopted by the Committee of Ministers of the Council of Europe on 10 November 1994 and entered into force on 1 February 1998, sets out principles to be respected as well as goals to be achieved by the states, in order to ensure the protection of national minorities. The text of the Framework Convention is available in English and French, as well as in other languages, including Croatian, Albanian, Bosnian, Bulgarian, Czech, German, Hungarian, Italian, Macedonian, Polish, Romani, Romanian, Russian, Serbian, Slovak, Slovenian, Turkish and Ukrainian.

This opinion contains the evaluation of the Advisory Committee following its 6th country visit to Croatia.

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