ADVISORY COMMITTEE ON THE
FRAMEWORK CONVENTION FOR THE
PROTECTION OF NATIONAL MINORITIES

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Comments of the Government of Croatia on the Sixth Opinion of the Advisory Committee on the implementation of the Framework Convention for the Protection of National Minorities by Croatia

received on 2 October 2026

The comments have been submitted under the sole responsibility of Croatia and made public by the Council of Europe Secretariat in accordance with Rule 29 of Resolution CM/Res(2019)49 on the revised monitoring arrangements under Articles 24 to 26 of the Framework Convention for the Protection of National Minorities.

Comments of the Croatian Government on the Sixth Opinion of the Advisory Committee on the implementation of the Framework Convention for the Protection of National Minorities by the Republic of Croatia

The Republic of Croatia wishes to reaffirm its commitment to the Framework Convention for the Protection of National Minorities and would like to thank the Advisory Committee for the transmission of its Opinion in the 6th monitoring cycle. Croatia takes this opportunity to express its gratitude to the delegation of the Advisory Committee for the constructive dialogue during and after its country visit, while the following statements are intended to clarify some issues.

In its Government Programme 2024 – 2028, under the priority "Just Croatia", the Croatian Government has committed to further building an inclusive society in which all citizens feel equal and safe, and where human rights and the rights of national minorities are observed. The Government has pledged to continue promoting cultural tolerance, consistently implement the policy of the rule of law and of rights of national minorities guaranteed by the Constitution, the Constitutional Act on the Rights of National Minorities, and relevant legislative acts. Furthermore, the Government has pledged to consistently protect and improve human rights and minority rights guaranteed by international and inter-governmental treaties, agreements and conventions, as well as the Treaty concerning the Accession of the Republic of Croatia to the European Union.

As noted in the Introduction of the Opinion, the Republic of Croatia is deeply committed to supporting the 22 national minorities and has a robust legal framework and targeted policies in place. Insofar, we believe that, parts of the Opinion overstate isolated incidents, based on information provided by the media, while paying insufficient attention to the numerous positive aspects of the Croatian Government policy which is implemented in close coordination with the minorities' representatives, particularly on the national level, including representatives in the Croatian Parliament.

As a reminder, the minorities' representatives in the Croatian Parliament hold eight guaranteed seats of the total of 153 seats. There is no vote threshold for minority lists, and their elected representatives are full-fledged members of the parliament.

The Croatian Government consistently implements the key act regulating the rights of national minorities, the Constitutional Act on the Rights of National Minorities, adopted in 2002. In cooperation with national minorities' representatives, the Government is continuously investing efforts in addressing the remaining challenges and improving the status of minorities. The Opinion mentions the National Minorities' Operational Programmes; however, it would seem that their wide-reaching contribution to the minorities' status is not fully taken into account, considering that the Operational Programmes have been implemented since 2017 and their scope broadened in practice.

The Opinion suggests that the support provided by the Government focuses on the area of cultural autonomy. Namely, the Opinion cites *"predominant focus"* on "*folkloristic aspects of national minorities"* thus creating a limited image of the overall efforts. Government's wide support is mentioned in various sections of the Opinion, however, it seems to have been taken less into consideration in the process of drafting the recommendations.

The scope of the Programme is strongly supported in financial terms. In that sense, in 2017, expenditure directly allocated for national minorities was 19,1 million euros, whereas in 2025, over120 million euros were spent on implementing the Operational Programmes for National Minorities alone. It follows then, that in this period there has been a six-fold increase in funding for minorities. This does not include the local and regional self-government authorities' funds, the EU project funds, or investments where minorities are part of the total target population.

All the areas under the Operational Programmes are covered by the Government grants: support for minorities' education and culture, local development and infrastructure, agriculture, sports, historical remembrance, etc. These investments have improved the living conditions for the national minorities' associations and institutions engaged in the preservation of national minorities' cultural heritage, language and identity, further extending cooperation with national minorities' countries of origin.

There are some challenges of course. Reports by the Ombudsperson indicate certain national minorities as groups which are more exposed to discrimination in certain areas. The Opinion, however, does not give a complete picture. For example, there are, indeed, issues in terms of the ratio of members of national minorities employed in public administration. However, the decline in those numbers is caused by multiple factors, with ethnic discrimination is certainly not one of them. Members of national minorities, as well as war veterans, the disabled, and certain other categories have rights of priority under equal employment opportunity. In 2025, however, out of 240 public calls in local self-government units offering 318 positions, only 14 candidates exercised their right to be prioritised based on their national minority background and eight of them were employed. In quite a number of self-governing units, employees do not declare their national minority background as this information is not mandatory. A large number of self-governing units, as well as police administrations and courts, have also recorded a decline in the interest to use a minority language, the right to be issued personal documents in a minority language and script, and other relevant activities in their domains.

Furthermore, we would like to point out the Opinion's incorrect interpretation of the statistics regarding the number of registered complaints concerning discrimination on the grounds of national origin or ethnicity. Paragraph 41 states as follows: "*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"*.

Footnote 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".

We consider the conclusion that 20 % is "*the vast majority*", to be exaggerated and incorrect.

Inaccurate interpretation is repeated in Article 37, footnote 52. It cites an incorrect total number of complaints on all bases of discrimination as a discrimination based on ethnic origin and thus creates the impression that they all relate to discrimination based on national, or ethnic origin.

Paragraph 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*."

Footnote 52: „*With regard to criminal cases, 14 cases were recorded in 2022, 11 in 2023 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*“.

However, official statistics gives a very different picture. Namely, of the 14 criminal proceedings related to multiple discrimination bases in 2022, two proceedings were related to national origin, while of 11 proceedings in 2023 a total of five were national origin related. Regarding the civil proceedings, of the total of 34 proceedings, only one was related to national origin, while not a single one related to race, ethnicity or skin colour. In 2022, of the total of 44 proceedings, there was one case of discrimination based on national origin, and one based on race. While individual cases of discrimination might occur, it is important to emphasize that the figures stated in the Opinion refer to all forms of discrimination (health, disability, gender and sexual orientation, social background, education, financial status and social status), not only discrimination based on national or ethnic origin.

According to the latest official data by the Ministry of the Interior, and the Ministry of Justice, Administration and Digital Transformation on civil, criminal, and misdemeanour proceedings respectively related to discrimination, particularly those which could be linked to national minorities, for the year 2025, of the 43 received civil proceedings, one relates to race or ethnicity or skin colour, one to religion, and four to national origin. In comparison, in the previous year 2024, of the total of 70 new proceedings, two were related to discrimination based on national origin, and none to discrimination based on race or ethnic origin, or skin colour. Of the 20 criminal proceedings, three were related to race or ethnicity or skin colour, none to religion, and six to national origin. Of the 272 misdemeanour proceedings, 78 were related to national origin, 47 to race or ethnic origin or skin colour, and five to religion. It should also be added that in 2025, 90 proceedings regarding discrimination based on national origin resulted in final judgments (with 47 convictions, 30 dismissals, and 13 proceedings where the final judgment was brought in another manner).

With the existing robust system in place in the area of protection of national minorities, fight against discrimination and hate speech, the Government of the Republic of Croatia remains committed to further promoting a culture of tolerance and advancing the rights of national minorities.