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Committee on Legal Affairs and Human Rights

Justice delayed: the unfinished implementation of the Daphne Caruana Galizia case

Introductory memorandum

Rapporteur: Baroness Shami CHAKRABARTI, United Kingdom, Socialists, Democrats and Greens Group

1. Introduction

1. On 16 October 2017, Maltese investigative journalist Daphne Caruana Galizia was on the way to the bank in her grey Peugeot. She had just uploaded a blog post, part of a series of articles in which she had exposed outrageous corruption in Malta. White smoke began to emerge from her car, followed by a bang and a flash. Five seconds later the car bomb ignited the petrol tank, creating a huge explosion. Daphne Caruana Galizia was killed, leaving a husband and three sons.¹

2. Daphne's story is one of a heroic journalist and a beloved family member, tragically murdered in cold blood. But it is also a story about globalised corruption, institutional failure, and the undermining of the rule of law.

3. In June 2019, the Assembly adopted [Resolution 2293 \(2019\)](#), "Daphne Caruana Galizia's assassination and the rule of law in Malta and beyond: ensuring that the whole truth emerges". The Assembly noted a series of serious concerns over the investigation into the murder, calling for an independent public inquiry at the earliest opportunity, as well as for wider fundamental, holistic reforms. The Assembly also recalled that Council of Europe bodies had identified widespread shortcomings in the Maltese system of government, including in the criminal justice system, anti-corruption institutions, and the rule of law itself. The Assembly highlighted in particular the extensive appointment powers of the Prime Minister and the lack of effective checks and balances. These fundamental weaknesses had allowed numerous major scandals to arise and go unchecked in Malta, most notably the murder of Daphne Caruana Galizia.

4. After the tireless campaigning of Daphne Caruana Galizia's family and huge international attention, an independent public inquiry was set up in Malta, as required by Article 2 of the European Convention on Human Rights (ETS No. 5). In July 2021 the inquiry concluded that the Maltese State bore responsibility for creating a climate of impunity, which had enabled the assassination of Ms Caruana Galizia. The inquiry issued comprehensive recommendations on the protection of journalists, judicial independence, the rule of law, and the fight against corruption.

5. The family of Daphne Caruana Galizia has expressed deep concern that the recommendations of the public inquiry have still not been carried out. Following a [motion for a resolution](#), the Committee on Legal Affairs and Human Rights was seized for report on 29 September 2025 on the topic "Justice delayed: the unfinished implementation of the Daphne Caruana Galizia case".² The signatories of the motion for resolution allege that the recommendations of the public inquiry remain largely unimplemented, and Malta's justice system continues to suffer from delays, especially in murder cases, with over half pending for more than five years. The motion

* Document declassified by the committee on 16 March 2026.

¹ Paul Caruana Galizia, *'A Death in Malta'*, 2023, Penguin Random House, page 173-174.

² Reference 4902 of 29 September 2025.

calls on the Assembly to examine the implementation of the public inquiry's recommendations and Malta's compliance with Council of Europe standards on rule of law and press freedom, and to consider how it can support efforts to ensure timely, independent justice, including by examining the causes of judicial delays and revisiting the State's accountability for its failure to act.

6. This introductory memorandum will set out the findings of the Assembly in [Resolution 2293 \(2019\)](#) (in section 2); summarise the findings of the independent public inquiry (section 3) and the Maltese criminal proceedings (section 4); explore the continuing concerns expressed by the Assembly and its members (section 5); and summarise the subjects that will be covered in my future report (section 6).

2. First Resolutions of the Parliamentary Assembly and the European Parliament

7. In its [Resolution 2293 \(2019\)](#) "Daphne Caruana Galizia's assassination and the rule of law in Malta and beyond: ensuring that the whole truth emerges", the Assembly concluded that the rule of law in Malta had been seriously undermined by the extreme weakness of effective checks and balances, creating a source of vulnerability for all of Europe. The Assembly concluded that there was a need for fundamental, holistic reforms, including subjecting the office of Prime Minister to effective checks and balances, ensuring judicial independence and strengthening law enforcement and other rule of law bodies. Regarding the authorities' response to the assassination of Daphne Caruana Galizia, it highlighted the length of the proceedings and the lack of progress in the magisterial inquiry. The Assembly also identified a series of serious concerns over the investigation into the murder, including various conflicts of interest, failures by the authorities to obtain relevant evidence, and inflammatory and misleading public statements by persons close to the Prime Minister. In this context, the Assembly called on Malta to, *inter alia*, implement reform packages recommended by the European Commission for Democracy through Law (Venice Commission) and the Group of States Against Corruption (GRECO), to publish a road map setting out substantive details of all relevant reform proposals, and to establish an independent public inquiry (within three months) in order to ensure fulfilment of its obligations under Article 2 of the European Convention on Human Rights. The Assembly also urged the Maltese law-enforcement bodies to end the prevailing climate of impunity by robustly investigating and prosecuting those suspected of being involved in or benefiting from the scandals exposed by Daphne Caruana Galizia and her colleagues.

8. In its [Resolution](#) of 18 December 2019 on "The Rule of Law in Malta, after the recent revelations around the murder of Daphne Caruana Galizia", the European Parliament expressed deep concerns about the integrity and credibility of the investigations into the assassination of Daphne Caruana Galizia and other investigations into related cases of money laundering and corruption. It noted serious and persistent threats to the rule of law, democracy and fundamental rights, including freedom of the media and the independence of the police and judiciary, and therefore called the Maltese authorities to, *inter alia*, implement the recommendations of the Venice Commission, GRECO and the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL), ensure the protection and independence of journalists and whistleblowers, and terminate the country's investor citizenship and residence schemes.

9. In November 2020, Pieter Omtzigt, the rapporteur for the report leading to the Assembly's 2019 resolution presented a follow-up report to the Committee on Legal Affairs and Human Rights. In this report, he highlighted the critical aspects of the implementation of Resolution 2293.³

3. The public inquiry and its conclusions

10. On 20 September 2019, Prime Minister Joseph Muscat appointed Judge Michael Mallia to preside over an independent inquiry into the murder of Daphne Caruana Galizia, under the Inquiries Act, Cap. 273 of the Laws of Malta, with two other members of the Board of Inquiry.⁴ At the same time, the Government expressed "serious reservations on the methodology used and the conclusions listed in the Resolution of the Parliamentary Assembly of the Council of Europe".⁵

11. Following the announcement of the inquiry, the family of Daphne Caruana Galizia raised serious concerns about the membership of the Board of Inquiry.⁶ These were taken up by Pieter Omtzigt. In an information note, which was endorsed by the Committee on Legal Affairs and Human Rights, Mr Omtzigt expressed serious concerns about the independence and impartiality of the proposed Board of Inquiry, as well

³ [AS/Jur \(2020\) 42](#), 30 November 2020.

⁴ Terms of Reference for the Public Independent Inquiry into the murder of Daphne Caruana Galizia, p.1.

⁵ [Statement by the Government of Malta](#), 20 September 2019.

⁶ See press release from Daphne's family, "[Consultation on membership of board of inquiry ongoing](#)", of 21 September 2019.

as serious problems with the terms of reference, which he argued were vaguely worded, provided overly broad grounds for holding hearings in camera, and restricted public access to the inquiry.⁷ After these statements, two of the three members of Board of Inquiry were replaced, and updated terms of reference were announced by the Maltese Government on 15 November 2019.⁸

12. On 18 September 2020, Pieter Omtzigt wrote to Robert Abela, the Maltese Prime Minister, noting “with extreme concern” his “recent public statement expressing ‘reservations about the way in which the inquiry is failing to keep to the terms of reference given to it’”. Mr Omtzigt denounced a “violation of the inquiry’s independence”, a “blatant political interference with its work” and a “concerted attack on its credibility and integrity”. He therefore requested the withdrawal of a purported limitation on the time frame for the inquiry’s work and asked the Prime Minister to refrain from any future adverse comment on the inquiry.⁹ In its response to Pieter Omtzigt’s letters, the Maltese Government stated that it was “committed to see the full truth emerge from this inquiry, with the board being provided with all the necessary financial and administrative resources in order to fulfil its tasks without interference, in a serene manner, and with reasonable expedition”.

13. The public inquiry report “Daphne Caruana Galizia, a journalist assassinated on 16 October 2017” (“the Inquiry Report”) was presented to the Maltese Prime Minister, Mr Robert Abela, on 29 July 2021. It found that the investigatory journalism of Ms Caruana Galizia, regarding well-founded allegations of inappropriate dealings between Maltese businesses and the government, had put at risk the personal interests of large businesses and even the stability of the then government. This had led to a political reaction involving a sustained campaign of personalised attacks of criticism and hate, incidents of verbal abuse, abusive lawsuits, and financial restrictions against Ms Caruana Galizia. An orchestrated plan aimed at the suppression of Ms Caruana Galizia’s journalistic work had been organised from the office of the then Prime Minister. Meanwhile, the Commissioner of Police had not investigated Ms Caruana Galizia’s credible allegations against high-ranking persons in politics and business.¹⁰

14. The Inquiry Report concluded that the institutions’ inaction could not be explained as simple incompetence or indifference. Although corruption had long existed in relation to large public projects in Malta, previously the regulatory authorities had always functioned and been able to investigate (albeit imperfectly). The novel development in the period leading up to the assassination, had been that the system designed to provide checks and balances had itself now been undermined. There had been an extended culture of impunity not only for the highest officials within the public administration, including persons of trust, but also for a restricted circle of politicians, businessmen and criminals. The Board of Inquiry had been struck by the nonchalant and confident manner in which those allegedly involved in the actual execution of the murder had openly displayed contacts that they had had with ministers, the Prime Minister’s chief of staff, and other individuals at the centre of power. This demonstrated a culture of impunity at the level of organised crime, supported by a net of control that organised power in the hands of a few people, and where individuals felt that they would not be held accountable for even the most heinous criminal acts. The inaction of the cabinet regarding the corruption allegations had sent the signal that the culture of impunity had the silent approval, if not the blessing, of the whole cabinet. The fact that the then Prime Minister Muscat had failed to dismiss his Chief of Staff or Minister Mizzi – even after they had both been implicated in the Panama Papers and a subsequent report with allegations of serious criminal conduct – had strengthened the general culture of impunity.¹¹

15. It is this background that had facilitated the targeted assassination. The Inquiry Report concluded that, although there was no evidence that the State as such had a role in the killing, the State bore responsibility for it by creating a climate of impunity, generated from the highest levels at the core of the administration and spreading to other entities such as regulatory institutions and the police. This had undermined the rule of law itself. The State and State entities had not acknowledged the real and immediate risk, including from the criminal conduct of third parties, to Daphne Caruana Galizia’s life; and the State had failed to take measures within the scope of its powers which, by reasonable judgement, it was expected to take in order to avoid that risk.¹²

⁷ See information note by Mr Pieter Omtzigt (Netherlands, EPP/CD), rapporteur of the Committee on Legal Affairs and Human Rights, of 30 September 2019: [Daphne Caruana Galizia inquiry in Malta ‘does not meet the Assembly’s expectations’](#).

⁸ [Statement by the government of Malta: Agreement on members and terms of reference of the Daphne Caruana Galizia Independent Public Inquiry, 15 November 2019](#).

⁹ [Omtzigt to Abela: You are interfering with the inquiry and violating the rule of law – Manuel Delia](#).

¹⁰ Public Inquiry Report, [translation provided by the Daphne Caruana Galizia Foundation](#), 29 July 2021, Conclusions, pp. 399-427.

¹¹ *Ibid*, p.409-412, 419-422.

¹² *Ibid*., p.399-400.

16. The events as a whole had almost undermined the country's institutions. There had been serious indications that, had the assassinations (and their repercussions) not occurred, the general situation may have deteriorated further to such an extent that the State could be described as being led by a mafia organisation. The assassination had been a cruel means to shatter the system which had been eroding democracy in Malta.¹³

17. As a result of these findings, the Inquiry Report called not only for the continuation of an effective criminal investigation into the murder, but also substantial reforms to ensure that freedom of expression and press freedom would be properly protected; that corruption and money-laundering would be effectively addressed; and that the rule of law in Malta would be restored. (These recommendations are addressed further in section 6).¹⁴

4. Criminal proceedings

18. On 5 December 2017, three men - George Degiorgio, Alfred Degiorgio and Vincent Muscat - were formally charged with the murder of Daphne Caruana Galizia, as well as with criminal use of explosives, being involved in organised crime, and criminal conspiracy. On 23 February 2021, Vincent Muscat pleaded guilty of murder and other crimes related to the killing, and was sentenced to 15 years in prison. On 14 October 2022, Alfred and George Degiorgio pleaded guilty to all six charges they faced and were sentenced to 40 years imprisonment each for their role as hitmen in the assassination. On 24 February 2021, two additional suspects, Robert Agius and Jamie Vella, were arrested and charged with complicity in the killing for supplying the bomb and coordinating with the hitmen. They were found guilty and sentenced to life imprisonment in June 2025. Their appeals were dismissed by Malta's Court of Criminal Appeal on 21 January 2026.¹⁵

19. In addition, in November 2019, Yorgen Fenech, one of the country's most prominent businessmen, was arrested as part of an investigation into the murder and released on bail without charge. In August 2021, Mr Fenech was indicted with complicity in murder and criminal association. The Attorney General has called for a life sentence plus an additional 20 to 30 years imprisonment. Following the Court of Criminal Appeals' decision of 4 October 2023 to uphold the decision to bring Yorgen Fenech to trial by jury, he is currently still awaiting trial.¹⁶ He was granted bail in January 2025.¹⁷ Yorgen Fenech lodged an application with the European Court of Human Rights, regarding his pre-trial detention and his conditions of detention during COVID. His complaints were all rejected.¹⁸

5. Follow-up work of the Assembly

20. In [Resolution 2451 \(2022\)](#), "The honouring of membership obligations to the Council of Europe by Malta", the Assembly noted with concern the Public Inquiry Report's findings of malfunctioning democratic institutions and in particular its conclusion that there was a culture of impunity and institutional *omertà* in Malta. It confirmed that although certain reforms had addressed specific deficiencies, they remained partial and insufficient. In the view of the Assembly, a comprehensive and holistic reform of Malta's democratic institutions and system of checks and balances was still needed. The Assembly continued to express concern about, *inter alia*, the persistence of a culture of impunity, weaknesses in parliamentary oversight, the concentration of power in the executive, threats to journalists and press freedom, and the limited effectiveness of anti-corruption and accountability mechanisms. The Assembly urged the Maltese authorities to implement the recommendations of the Inquiry Report and the Venice Commission.

21. Since 2018, members of the Parliamentary Assembly of the Council of Europe regularly asked the Committee of Ministers questions concerning an alleged absence of progress made by Malta in investigating evidence of money laundering by government officials and their relatives, addressing the issues that led to the assassination of Ms Daphne Caruana Galizia, and better protecting journalists and whistleblowers. Several written questions also covered the non-implementation by the Maltese authorities of the recommendations of the Inquiry Report, GRECO, and MONEYVAL, as well as the recommendations of the Committee of Ministers on the safety of journalists. Members of the Assembly finally questioned the action undertaken in order to ensure that Malta is making sufficient progress in bringing Yorgen Fenech to trial without delay.¹⁹

¹³ *Ibid.*, p. 423.

¹⁴ *Ibid.*, p. 429-447.

¹⁵ [Safety of journalists platform, Updates on Alert No. 120/2017](#).

¹⁶ [Safety of journalists platform, Updates on Alert No. 120/2017](#).

¹⁷ *Ibid.*

¹⁸ *Fenech v. Malta*, Application No. 19090/20, Judgment of 1 March 2022, and Decision of 23 March 2021.

¹⁹ Parliamentary Assembly, Written questions Nos. [727](#), [786](#), [800](#), [802](#), and [803](#) to the Committee of Ministers.

6. Topics of concern and future work

22. The motion for a resolution which gives rise to the current report indicated that the Assembly should examine the implementation of the Inquiry Report's recommendations and Malta's compliance with Council of Europe standards on rule of law and press freedom. The sub-sections below provide a breakdown of the measures and key reforms that were highlighted as necessary by the Inquiry Report, the progress of which will be examined in my full report. Although some reforms have been carried out in certain areas since the publication of the Inquiry Report, this document does record or assess any progress made, as this task will be reserved for my full report.

6.1 Individual accountability for the murder

23. According to the Inquiry Report, the alleged assassins acted on instructions from persons who believed that they were protected, would likely not be caught, and would never be held accountable for their actions. However, the Inquiry Report did not directly address individual accountability for the murder, which lay outside the inquiry's scope.²⁰ The Board of Inquiry therefore only suggested to the Maltese authorities that they continue their investigations and ensure that all the individuals involved in the assassination answered for their deeds before the courts.²¹ In addition, the Inquiry Report recommended that the State formally and publicly acknowledge the serious failings by the public administration relating to the assassination.²² Finally, the Inquiry Report indicated that the government should consider taking all appropriate and opportune steps to ensure that the State reconciles with Daphne Caruana Galizia's family in order to initiate the healing process of a serious and traumatic wound which the whole country had suffered.

24. While five individuals have already been sentenced for carrying out the murder or facilitating it, there has not yet been a trial of the person(s) who ordered the killing.

25. Yorgen Fenech was first arrested in 2019, after the Maltese police intercepted and searched his yacht. His detention led to the resignation of Keith Schembri, the Maltese Prime Minister's chief of staff, and Konrad Mizzi, the country's Minister for Tourism, as well as the suspension from office of Economy Minister Chris Cardona. Although Mr Fenech was charged with complicity in murder and criminal association in August 2021, he is still awaiting trial and was released on bail in January 2025. The Daphne Caruana Galizia Foundation has raised serious concerns about the excessive length of the proceedings.²³

6.2 Reforms to protect freedom of expression and press freedom

26. The Inquiry Report recommended the following:

26.1. The establishment of a dedicated structure within the police, staffed by specialised trained personnel, to identify, assess, and investigate risks faced by individuals, with an element dedicated to journalists at risk. The assessment should not be reserved to the Commissioner of Police. Furthermore, police forces should receive training on the values and methods used by journalists and investigate allegations arising from their work in a timely manner;²⁴

26.2. Steps to ensure that serious allegations which arise in the course of journalists' investigations are properly investigated in a timely manner;²⁵

26.3. Consideration of an amendment to the Constitution to recognise freedom of journalism as a pillar of a democratic society and provide that the State has an obligation to guarantee it and protect it;²⁶

26.4. Consideration of an amendment to the Constitution to recognise an individual's right to receive information from the State and public administration, as well as the obligation on the State and the public authorities to provide such information;²⁷

²⁰ Public Inquiry Report, [translation provided by the Daphne Caruana Galizia Foundation](#), 29 July 2021, p.282-283.

²¹ *Ibid.*, p.429.

²² *Ibid.*, p.446.

²³ Daphne Caruana Galizia Foundation, Report "Justice at Risk: The Impact of Delayed Legal Proceedings in Wilful Homicide Cases in Malta", 2025, p.23.

²⁴ Public Inquiry Report, [translation provided by the Daphne Caruana Galizia Foundation](#), 29 July 2021, p. 435-436, 438.

²⁵ *Ibid.*, p. 436.

²⁶ *Ibid.*, p. 440.

²⁷ *Ibid.*, p. 440.

26.5. The creation of an independent Ombudsman or Commissioner for journalistic ethics, similar to the Commissioner for Standards in Public Life. This authority would be fully autonomous and impartial and would have the power to implement laws and regulations intended to protect media freedom, the safety of journalists, and the right to information. It would also serve as a point of reference for journalists who would want direction or protection, but also as a means to ensure compliance by journalists with rules of ethics and good conduct;²⁸

26.6. The revision of the constitutional provisions relating to the Broadcasting Authority to ensure its impartiality;²⁹

26.7. The revision of the Freedom of Information Act to limit the circumstances in which public authorities may refuse access to information of public interest;³⁰

26.8. The revision of the Media and Defamation Act to prevent Strategic Lawsuits Against Public Participation ("SLAPPs"), including by banning frivolous libel suits against journalists by individuals in public positions, and by ensuring that libel suits against journalists could not continue after the journalist's death;³¹

26.9. Steps to ensure that the allocation of public funds for advertising is fair, equitable, and non-discriminatory - in order to ensure that preference is not given to public service or media organisations which lean toward the government.³²

26.10. A law to regulate the profession of journalist. This would: provide an organisational framework in which journalists may operate freely and totally independent from interference or undue pressure; reflect the important role that media have in a democratic society; provide a suitable structure which offers journalists protection; ensure the self-regulation of the profession, including with ethical standards and a power to take disciplinary measures when necessary; and have full independence and autonomy (including financial autonomy);³³

26.11. Establishment of a committee of experts to carry out the reforms set out above. This would be initiated under the auspices of the President of Malta, and comprised of academics, experts in media law, journalists, and owners of media organisations. It would be tasked with making specific recommendations to parliament within an established short period.³⁴

6.3 Reforms to ensure an effective fight against corruption and money-laundering

27. The Inquiry Report urged Malta to implement the recommendations made by GRECO, noting the need for the following reforms in particular:

27.1. Amendments to criminal law, the regulation of financial institutions, and other legislation to prevent a *de facto* state of impunity in regard to corrupt activities. In particular, amendments should put an end to the policy of merely imposing financial sanctions for irregularities and illegalities, as the full weight of the criminal law must be brought to bear against corrupt activities;³⁵

27.2. Amendments to legislation to ensure that relationships between the public administration and businesspeople are properly and effectively regulated, to ensure transparency and accountability. Laws should stipulate that there are no secret negotiations and that any contact relating to possible investments through non-governmental and non-official communication is prohibited. Real-life practices must reflect the content of such laws. Lobbying, particularly lobbying to promote commercial projects, should also be regulated by law.³⁶

²⁸ *Ibid.*, p. 441.

²⁹ *Ibid.*, p. 441.

³⁰ *Ibid.*, p. 442.

³¹ *Ibid.*, p. 442.

³² *Ibid.*, p. 443.

³³ *Ibid.*, p. 442-443.

³⁴ *Ibid.*, p. 445-446.

³⁵ *Ibid.*, p. 430.

³⁶ *Ibid.*, p. 431-432.

27.3. A specific law to fight financial crime, including bribery and corruption, by means of “Unexplained Wealth Orders”.³⁷

28. The Inquiry Report also suggested broader reforms to address the shortcomings in the system of checks and balances and to strengthen the rule of law in Malta (see section 6.4), which could help tackle issues related to money laundering and corruption. Furthermore, the Inquiry Report emphasised the need for the allocation of public funds for advertising to be fair, equitable, and non-discriminatory.³⁸

6.4 Reforms to protect the rule of law

29. The Inquiry Report urged Malta to implement the recommendations previously made by the Venice Commission. In addition, it listed the following recommendations for reform:

29.1. Specific legal provisions to criminalise the following: (i) public officials hindering or attempting to hinder the police or other authorities in the execution of their duties; (ii) “mafia-style association” (similar to Article 416bis of the Italian Criminal Code); (iii) abuse of office in the exercise of the duty of functions of a public official or a person in charge of a public service; and (iv) obstruction of justice and the attempt to pervert the course of justice.³⁹

29.2. Revision of the Attorney General Law, in order to fully implement the recommendations of the Venice Commission, in regard to the full control of the investigation of serious crimes together with the police, in addition to providing the power to initiate an investigation directly.⁴⁰

29.3. Legislative provisions, including in the codes of ethics, to safeguard against improper conduct of public officials in the execution of their duties.⁴¹

30. In three opinions dating from 2018 and 2020, the Venice Commission identified excessive concentration of power in the executive, particularly the Prime Minister’s influence over key institutions such as the police, prosecution services, and senior public appointments. It criticised the lack of effective checks and balances, the insufficient independence of the judiciary and law-enforcement authorities, and the absence of safeguards to prevent conflicts of interest at the highest political level. While acknowledging legislative reforms adopted by Malta, the Venice Commission consistently underlined that several changes were incomplete or insufficiently implemented, and that deeper structural reforms were still necessary to ensure genuine institutional independence, effective investigations, and the rule of law.⁴²

31. The Venice Commission therefore recommended a series of structural reforms to address the rule-of-law deficiencies revealed by the Daphne Caruana Galizia case. It notably called for a reduction of the powers of the Prime Minister, and the reinforcement of checks and balances, including a more effective role for Parliament and independent oversight bodies, and the reform of appointment and dismissal procedures so as to remove political influence. It recommended stronger safeguards against conflicts of interest, clearer accountability mechanisms for public officials, and more transparent decision-making processes.⁴³

6.5 Reforms to address delays in the justice system

32. In its [Resolution 2293 \(2019\)](#), the Assembly noted that “*magisterial inquests as a means of investigating criminal offences (...) are poorly co-ordinated with police investigations, take an inordinately long time and tend towards confusion, inefficiency and ineffectiveness*”.⁴⁴

33. In regard to the efficiency of the Maltese justice system, in 2024 the European Commission for the Efficiency of Justice (CEPEJ) assessed the disposition time – the projected time for a pending case to be

³⁷ *Ibid.*, p. 433.

³⁸ *Ibid.*, p.443.

³⁹ *Ibid.*, p.433-434.

⁴⁰ *Ibid.*, p.434.

⁴¹ *Ibid.*, p.434.

⁴² See Venice Commission, [Opinion on constitutional arrangements and separation of powers and the independence of the judiciary and law enforcement](#), of 14-15 December 2018; [Opinion on proposed legislative changes](#) of 18 June 2020; [Opinion on ten acts and bills implementing legislative proposals subject of opinion](#) CDL-AD(2020)006 of 8-9 October 2020.

⁴³ See Venice Commission, [Opinion on constitutional arrangements and separation of powers and the independence of the judiciary and law enforcement](#), of 14-15 December 2018 p.28-29; [Opinion on proposed legislative changes](#) of 19 June 2020, p.18-19; [Opinion on ten acts and bills implementing legislative proposals subject of opinion](#) CDL-AD(2020)006 of 8-9 October 2020, p. 19-20.

⁴⁴ See Parliamentary Assembly, [Resolution 2293 \(2019\)](#) of 26 June 2019, para. 2.9.

resolved - on the basis of data from 2022. CEPEJ concluded that, *“In all matters and all instances, the disposition time values are above the respective Council of Europe medians. However, it should be noted that there is an improvement in 1st and 2nd instance civil cases, as well as in 1st instance criminal cases.”*⁴⁵

7. Proposals for further work

34. My future work will be dedicated to gathering information about the issues above, to assess the degree to which the Maltese authorities have carried out the recommendations listed by the Inquiry Report. In addition, it is also noteworthy that the Inquiry Report adopted in general the recommendations made by the Venice Commission, GRECO, and the report of the Assembly's Committee on Legal Affairs and Human Rights adopted on 8 June 2019.⁴⁶ As a result, the lists above may also be added to, to ensure that key recommendations made by Council of Europe bodies, which were incorporated into the Inquiry Report, are fully reflected. I will also examine any more recent reports on Malta by the Venice Commission, GRECO and MONEYVAL. In order to gather relevant information, I intend to carry out a fact-finding visit to Malta, as well as at least one hearing with experts in our committee.

35. The family of Daphne Caruana Galizia will be first on my list of those to be invited to appear before the committee. Although it is beyond the scope of this document to assess the progress made by the Maltese authorities in implementing the relevant recommendations, it is concerning that in July 2025 the family of Daphne Caruana Galizia concluded that, *“Four years since the public inquiry into Daphne's assassination, almost nothing has changed”*.⁴⁷

⁴⁵ CEPEJ, 'European judicial systems evaluation report, 2024 evaluation cycle (2022 data), Part 2 country profiles', page 110.

⁴⁶ Public Inquiry Report, [translation provided by the Daphne Caruana Galizia Foundation](#), p.430.

⁴⁷ Daphne Caruana Galizia Foundation website, "4 years since the public inquiry into Daphne's assassination, almost nothing has changed", published 29 July 2025.