

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

2025 Activities Report

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Council of Europe

Division for Cooperation on Freedom of Expression

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List of Abbreviations

AGK	Association of Journalists of Kosovo
AMA	Audiovisual Media Authority (Albania)
AVMSD	Audiovisual Media Services Directive
BiH	Bosnia and Herzegovina
CDMSI	Steering Committee on Media and Information Society
CoE	Council of Europe
DSA	Digital Services Act
ECtHR	European Court of Human Rights
EFEEX	Enhancing Institutional Capacities on Freedom of Expression and Information (BiH project)
EMFA	European Media Freedom Act
HELP	Human Rights Education for Legal Professionals
IMC	Independent Media Commission (Kosovo)
MIL	Media and Information Literacy
MoF	Ministry of Foreign Affairs
NUJU	National Union of Journalists of Ukraine
PACE	Parliamentary Assembly of the Council of Europe
PROFREX	Protecting Freedom of Expression and Media in the Western Balkans project
RESIST	Strengthening Societal Resilience to Disinformation in Europe project
REM	Regulatory Authority for Electronic Media (Serbia)
SLAPP	Strategic Lawsuit Against Public Participation
UIMC	Ukrainian Institute of Media and Communication
U.N.E.S.C.O	United Nations Educational, Scientific and Cultural Organisation
Tromsø Convention	Council of Europe Convention on Access to Official Documents
SEEDIG	Southeastern European Dialogue on Internet Governance
EuroDIG	European Dialogue on Internet Governance
IGF	Internet Governance Forum

Council of Europe

Division for Cooperation on Freedom of Expression

2025 Activities Report

The Council of Europe [Division for Cooperation on Freedom of Expression](#) supports its member states in enhancing policies, legislation, and capacities related to freedom of expression, media, access to information and protection of information integrity. These efforts are aligned with European standards and incorporate collaboration with ministries, parliaments, media regulators, law enforcement agencies, journalists, self-regulatory bodies, civil society, and media watchdogs. More specifically, its cooperation projects include advising on policies and legal frameworks, facilitating coordination and cooperation between authorities of the member states, as well as providing capacity building, training, and awareness-raising in the following areas:

- Promoting the role of media in democratic societies
- Safeguarding media pluralism, diversity, and transparency of media ownership¹
- Strengthening governance of public service media²
- Reinforcing independence and capacity of national regulatory authorities³
- Countering and building resilience to disinformation⁴, promoting media literacy⁵
- Improving quality of journalism, media coverage of elections and sports, combatting hate speech, promoting green journalism and gender-sensitive reporting⁶
- Ensuring the safety of journalists and media actors, including during times of war and conflict⁷;
- advising on anti-SLAPP legislation⁸

¹ Cf [Recommendation CM/Rec\(2018\)1 of the Committee of Ministers to member States on media pluralism and transparency of media ownership](#).

² The Committee of Ministers [Recommendation on public service media governance \(2012\)](#).

³ [Recommendation CM/Rec\(2022\)11 of the Committee of Ministers to member States on principles for media and communication governance](#).

⁴ [Guidance Note on Countering the Spread on Online Mis- and Disinformation through Fact-checking and Platform Design Solutions in a Human Rights Compliant Manner \(2024\)](#).

⁵ [Recommendation CM/Rec\(2022\)4 of the Committee of Ministers to Member States on promoting a favourable environment for quality journalism in the digital age](#).

⁶ [Recommendation CM/Rec\(2022\)4 of the Committee of Ministers to Member States on promoting a favourable environment for quality journalism in the digital age](#).

⁷ [Recommendation CM/Rec\(2016\)4 of the Committee of Ministers to member States on the protection of journalism and safety of journalists and other media actors](#).

⁸ [Recommendation CM/Rec\(2024\)2 on countering the use of strategic lawsuits against public participation \(SLAPPs\)](#).

- Aligning the national legal frameworks and practice with Council of Europe standards and the European Court of Human Rights' case law related to freedom of expression (Article 10 of the European Convention on Human Rights)⁹
- Ensuring access to information in the context of freedom of expression¹⁰

The Division works closely with the Steering Committee on Media and Information Society (CDMSI), the Platform for Safety of Journalists, the Journalists Matter Campaign, and other relevant Council of Europe and international bodies.

Highlights of 2025 Activities

In 2025, the Division implemented projects and activities in twenty-two countries and beneficiary entities, with a total budget of approximately **12.3 million euros**.

A new project [RESIST](#), funded by Norway Grants, was launched with participation of nine EU member states. The project will help prepare national strategies to build resilience to disinformation.

For the first time, the Division provided assistance to **Poland** and **Estonia** on the antiSLAPP legislation and training, following requests from the authorities.

Seventeen legal opinions and policy advice documents (listed in the Appendix) were prepared, and over hundred workshops, peer exchanges, conferences, and training sessions involving more than a thousand participants, were organised. In addition to this, the Division invested in, developed, and is continuing to develop further guidance, training and capacity building programmes as outlined below.

Key highlights this year include the Division's contributions to the **New Democratic Pact for Europe**, the implementation of the **Recommendation to counter SLAPPs**, the Safety of Journalists Campaign,¹¹ and work to counter, and build societal resilience to, disinformation.

⁹ Article 10 of ECHR.

¹⁰ [The Council of Europe Convention on Access to Official Documents \(Tromsø Convention\)](#)

¹¹ Journalists Matter Campaign. See <https://www.coe.int/en/web/freedom-expression/safety-of-journalistscampaign>.

Training and Capacity Building

Council of Europe Training Programme on countering the use of SLAPPs

The Division has updated, upgraded and published the [Council of Europe Training Programme on Countering the use of SLAPPs](#), taking into account the new Council of Europe Recommendation **CM/Rec(2024)2**¹² and the EU Directive 2024/1069. It is designed to enable judges, prosecutors, and legal professionals to identify SLAPPs and apply European standards to counter and dismiss them. The Programme has been successfully piloted and been implemented in several countries, which generated a growing number of requests and intentions to incorporate it into the regular curricula of the judicial training institutions. The Programme has also served as a basis for developing more concrete, nationally tailored guidance, such as a Guide for Legal Professionals on Freedom of Expression, SLAPPs and Related ECHR Standards¹³. Several workshops resulted in including a reference to the Council of Europe Recommendation in the draft legislation.

Council of Europe Training Programme on Safety and Protection of Journalists

This Training Programme is focused on Council of Europe Recommendation CM/Rec(2016)4¹⁴ on the protection of journalism and safety of journalists and other media actors, designed for police and law enforcement. It draws upon and incorporates elements from existing trainings and implementation guidance, such as the HELP course on Protection and Safety of Journalists and both the Implementation Guide to Recommendation CM/Rec(2016)4¹⁴ and the Extended Implementation Guide.¹⁵ In addition, the Programme includes learnings from and references to established good practices, such as the Netherlands' *Persveilig* programme and the role of police within it, as well as emerging good practices as compiled by the Journalists Matter Campaign.¹⁶

¹² [Recommendation CM/Rec\(2024\)2 on countering the use of strategic lawsuits against public participation \(SLAPPs\)](#)

¹³ [Guide for Legal Professionals on Freedom of Expression, SLAPPs and Related ECHR Standards](#) ¹⁴ [Recommendation CM/Rec\(2016\)4](#).

¹⁴ [Implementation Guide to Recommendation CM/Rec\(2016\)4](#).

¹⁵ [Extended Implementation Guide](#).

¹⁶ Journalists Matter Campaign. See <https://www.coe.int/en/web/freedom-expression/safety-of-journalists-campaign>.

Council of Europe Training Programme on Access to Information in the Context of Freedom of Expression

This Training Programme consists of three distinct programmes addressed to (i.) judges, prosecutors and other legal professionals, (ii.) civil servants, (iii.) journalist and media actors. For each target group, the content is focused on the most relevant aspects of access to information and freedom of expression, addressing each group's unique responsibilities and challenges. Based on European standards, namely Article 10 of the European Convention on Human Rights and the Council of Europe Convention on Access to Official Documents (Tromsø Convention), the Training Programme aims to empower participants to apply access to information laws effectively and to uphold transparency and accountability within their professional roles. The Programme is designed to be interactive and adaptable to the functions and responsibilities of the three groups of participants, as well as to the local context in which the training is conducted. In 2025, it was finalised and delivered in several countries.

Other training programmes being developed and delivered by the Division address freedom of expression, disinformation, media coverage of elections, quality journalism, journalistic ethics, green journalism, conflict, gender-sensitive reporting, and other relevant issues.

Publications

Limiting the Use of Criminal Law to Restrict Freedom of Expression: A Guide to Council of Europe Standards

This [Guide](#), published in September 2025, provides an overview of European standards on the use of criminal sanctions in relation to the exercise of the right to freedom of expression. It is intended for legislators, civil society, civil servants, media, and other policy-maker stakeholders, providing a user-friendly overview of standards developed through the case law of the European Court of Human Rights, as well as policy guidance issued by Council of Europe bodies such as the Committee of Ministers, the Parliamentary Assembly, and the Venice Commission. It highlights the main risks associated with the use of criminal law to sanction expression and sets out the overarching principles developed by the Council of Europe to mitigate those risks.

Key events organised by the Division

World Forum for Democracy 2025

In November, the Division sponsored the participation of legendary punk-rock band Gogol Bordello at the World Forum for Democracy, which included artistic performance and the session “[Music is a Force](#)”, followed by a screening of the “Scream of My Blood: A Gogol Bordello Story” documentary. The session covered the issues of artistic freedom and political engagement of artists, the role of music in promoting democracy, and in supporting Ukraine.

Regional Training of Trainers on Countering SLAPPs

In September, a three-day regional Training of Trainers (ToT) on Countering Strategic Lawsuits Against Public Participation (SLAPPs) was held in Strasbourg bringing together about 30 participants from Azerbaijan, Georgia, Moldova, Poland and Ukraine. The ToT equipped participants with the knowledge and practical tools needed to deliver training on SLAPPs in their home countries and beyond. Participants explored the definition and indicators of SLAPPs, European instruments and standards, case documentation and online resources, as well as procedural safeguards, remedies, and support measures for journalists and other public watchdogs. A distinctive feature of the training was the practical exercise, during which participants presented segments of the training themselves.

In October, a two-day-long Training of Trainers on Countering SLAPPs was co-organised together with the Journalists Matter Campaign in Prague. Around 25 participants, including judges, ministerial representatives, legal professionals, and journalists, mostly from EU countries, actively engaged in discussions on identifying and addressing SLAPPs. Feedback from the training indicated a **significant increase in participants’ knowledge and understanding** of the issue, which is expected to **improve their ability to address SLAPP-related court cases** and **support the forthcoming transposition of the EU Anti-SLAPP Directive** into national legislation.

IGF

The Council of Europe’s Open Forum session on “[AI and Disinformation: Countering the Threats to Democratic Dialogue](#),” was held in June, in Oslo, at the Internet Governance Forum (IGF) and was co-organised by the Division for Cooperation on Freedom of Expression and the CDMSI. The session explored the growing challenge of disinformation in the age of artificial intelligence (AI) and reaffirmed the Organisation’s commitment to

addressing it through the [Framework Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law](#) and the [Guidance Note on countering the spread of online mis- and disinformation through fact-checking and platform design solutions in a human rights compliant manner](#). Discussions highlighted AI's dual nature as both a threat and a tool for safeguarding a healthy digital information ecosystem, noting the evolution from small-scale disinformation to large-scale, automated dissemination and emerging risks such as deepfakes, algorithmic bias, and "LLM grooming." Speakers are calling for systemic, rights-based, and empowering responses - including education and AI literacy - to strengthen democratic resilience. Examples of national practices promoting ethical AI, transparency reporting, and co-regulation were showcased, while participants underscored the importance of enhancing digital literacy, supporting factchecking, and reinforcing regulatory frameworks to foster a more trustworthy and resilient information environment.

EuroDIG

In May, a EuroDIG session in Strasbourg on "[Countering Disinformation and Harmful Content Online](#)" was organised as a multi-stakeholder dialogue with regulators, parliamentarians, journalists, experts, and online platforms. Participants discussed inadequate legal frameworks, ineffective platform self-regulation, lack of data access, algorithmic biases, and online threats targeting journalists - particularly women and minorities - while stressing the importance of media literacy, independent journalism, and international cooperation. The Council of Europe's [Guidance Note on countering the spread of online mis- and disinformation through fact-checking and platform design solutions in a human rights compliant manner](#) was presented as a key-soft law instrument. National experiences from Ukraine and Moldova in countering Russian propaganda, as well as challenges faced by Western Balkan regulators and Belarusian media in exile, were shared. Speakers also highlighted how platform impunity fuels online violence and disinformation, calling for stronger regulation and accountability mechanisms. Recent European Court of Human Rights case law was discussed, focusing on states' duty to safeguard democratic debate from propaganda. The session concluded with recommendations to de-monetise disinformation, strengthen public service media, and enhance cooperation through initiatives like the European Digital Media Observatory (EDMO).

SEEDIG

In the context of the Southeastern European Dialogue on Internet Governance (SEEDIG) held in October in Athens, the high-level panel on "Countering Harmful Content and

Disinformation Online” gathered regulators, national authorities, and experts from Greece, Bosnia and Herzegovina, and Albania to exchange experiences and promote coordinated approaches to countering disinformation. Participants discussed Council of Europe instruments and upcoming initiatives on information integrity and media and information literacy (MIL). They explored challenges and good practices in aligning national frameworks with Council of Europe and EU standards, particularly under the Digital Services Act (DSA). The debate underscored the importance of multi-stakeholder cooperation, including partnerships with civil society, and of empowering users through MIL programmes, such as Greece’s “Cultivating Critical Readers” initiative. Discussions also addressed the link between hate speech and discrimination, highlighting the difficulty of identifying online perpetrators and the need for stronger alliances with journalists, students, and institutions.

Conference on Building Democratic Resilience to Disinformation

In September, under Malta’s Presidency of the Committee of Ministers, the Division in cooperation with CDMSI and other Council of Europe Steering Committees and Malta’s Ministry for Foreign Affairs and Tourism organised a [High-level conference on “Building Democratic Resilience to Disinformation”](#). Underscoring the importance of countering disinformation within a rule of law framework that respects human rights - particularly freedom of expression - the conference offered a platform for dialogue, collaboration, and renewed commitment to safeguarding democratic values across the continent. Rich discussions between national and Council of Europe officials, members of several Council of Europe Steering Committees, experts, academia and civil society organisations concluded in a set of [takeaways](#).

The conference also launched the Council of Europe’s new project [RESIST: Strengthening Societal Resilience to Disinformation in Europe](#), supported by the EEA & Norway Grants which aims to strengthen democratic resilience in Europe by addressing the growing threat of disinformation. Unlike traditional approaches that focus primarily on factchecking or content moderation, RESIST targets the “demand side” of the disinformation challenge - **empowering citizens to critically engage with information**. Through media literacy, education, youth participation, and cultural initiatives, the project helps people recognise and resist manipulative narratives. RESIST also promotes cross-sector collaboration among governments, educators, journalists, and civil society, encouraging the co-creation of strategies that strengthen societal resilience. Although it is still in its inception phase, **the project has already generated strong interest, with nine European countries ready to implement it**.

Key Achievements by Country

Ukraine

The Project [“Safeguarding Freedom of Expression and Freedom of the Media in Ukraine – Phase II”](#) contributed significantly to the improvement of draft laws and legislative amendments related to media, freedom of expression and access to information in light of their compliance with Ukraine’s EU accession process. (see *the list of Legal opinions*)

In co-operation with the Institute of Mass Information (IMI) and the *Verkovna Rada* Committee on Humanitarian and Information Policy, [the exhibition “PRESS IN DETENTION – #FreeUkrainianJournalists”](#), was organised in Strasbourg during the PACE autumn session. The exhibition presented the names, photographs, and stories of 26 Ukrainian journalists currently held in Russian captivity, and included a special stand dedicated to Viktoriia Roshchyna, a journalist tortured to death in Russian custody. Recently released Ukrainian journalists Dmytro Khyliuk and Vladyslav Yesypenko shared their testimonies during meetings with the Council of Europe and PACE leadership, exposing grave violations of international law.

A two-day training for law enforcement officials, with the involvement of journalists, on protecting journalists’ professional activity and freedom of expression in Ukraine, was organised. Following the adoption of new European anti-SLAPP standards - the Council of Europe Recommendation CM/Rec(2024)2 and the EU Directive 2024/1069 - the project supported the establishment of a working group on the integration of anti-SLAPP standards into Ukrainian legislation. The members of the working group participated in a peer exchange with the Polish counterparts on drafting the anti-SLAPP legislation. As a result, **the current draft law on countering SLAPPs includes a reference to the Council of Europe Recommendation.**

In co-operation with UNESCO and the Ukrainian Institute of Media and Communication (UIMC), the project helped organise a conference on media literacy in Ukraine. It also contributed to the organisation of the Lviv and the Donbas Media Forums.

The project supported the Ukrainian **public broadcaster** *Suspilne* with trainings aimed to enhance professional skills, ethical standards and safety of journalists. Expert support was provided for the development of four internal management and regulation documents for *Suspilne*, to ensure its independence and sustainability.

The Council of Europe experts were involved to assist in the development of recommendations for a methodology on monitoring hate speech and discrimination in Ukrainian media for the National Council of Television and Radio Broadcasting of Ukraine (Audiovisual Regulator). Assistance was provided in the development of four strategic documents for the co-regulatory body overseeing audiovisual media services. Thanks to the project, the representatives of the regulatory authorities were able to participate in many international events and learn from the experience of their peers.

Moldova

The Project “[Advancing Media Freedom in the Republic of Moldova](#)” has achieved a series of important milestones strengthening the audiovisual field across multiple areas. Support was provided to the Moldovan Parliament to harmonise the national legal framework with EU legislation and Council of Europe recommendations. The Project has also contributed to improving media literacy and safety of journalists, through the [Media Literacy Assessment in the Republic of Moldova](#) and the production of a documentary on safety of journalists involving Moldova, Ukraine, Armenia, Georgia and exiled Belarusian journalists. Training and capacity-building for the government was organised to help monitor and implement the new legal framework on access to information and transparency.

As a result of comprehensive legal advice provided by the Project, the Parliament of the Republic of Moldova has amended the Audiovisual Code and the Law “On Mass Media”, which allowed the Committee of Ministers of the Council of Europe to close supervision of the *Manole and Others v. Republic of Moldova (Application No. 13936/02)* case, related to the Article 10.

Georgia

The Project “[Supporting Freedom of Expression and Media in Georgia](#)” achieved progress in strengthening advocacy for media freedom and addressing Strategic Lawsuits Against Public Participation (SLAPPs). Georgian civil society organisations improved their system for documenting media-freedom violations and became an active contributor to the Council of Europe Platform for the Safety of Journalists, submitting alerts on incidents in Georgia more consistently and promptly. The Anti-SLAPPs Platform, composed of five organisations, identified four potential SLAPP cases and provided legal support. For the first time, Georgian lawyers applied the Council of Europe Recommendation on countering SLAPPs directly in national litigation, using its criteria to argue for recognition of SLAPP patterns before courts. A Training of Trainers session strengthened the capacity

of anti-SLAPPs platform members, who are now prepared to train other lawyers across Georgia.

Azerbaijan

The Project [“Promoting media professionalism and freedom of information in Azerbaijan”](#) raised legal expertise on access to information by enhancing the professional capacity of 25 members of the Azerbaijani Bar Association through a two-day training on international legal standards. The training improved participants’ understanding of comparative frameworks and reinforced their ability to apply the access to information principles in legal practice.

A three-day study visit to Zagreb (Croatia), was organised to introduce Azerbaijani stakeholders to European best practices in personal data protection and privacy. Participants gained first-hand insight into institutional co-ordination and compliance mechanisms for implementing data protection systems in line with the Convention 108+ and the GDPR.

In addition, the Project finalised the development of the first national textbook on Conflict-Sensitive Journalism. The textbook is based on the Council of Europe curriculum, which has already been adopted by four universities in Azerbaijan. This publication will contribute to sustainable journalism education in the country by supporting the integration of ethical and conflict-sensitive reporting into academic instruction. A series of trainings on Green Journalism (environmental investigative reporting) for Azerbaijani journalists and other media professionals were also delivered.

The Project invested in developing national training capacity to counter Strategic Lawsuits Against Public Participation (SLAPPs). The lawyers trained by the project are now equipped to deliver follow-up capacity-building activities and awareness sessions on countering SLAPPs in Azerbaijan.

Estonia

Considering high interest of the Estonian media community to the issue of countering SLAPPs, the Division organised two events in Tallinn: 1) Two-day training for journalists and media actors on countering the use of SLAPPs and 2) Workshop “Implementing AntiSLAPP Standards in Estonia: Discussion with Journalists and Legal Professionals”, for journalists, lawyers, judges, and relevant public officials. Both events were organised

jointly with the Estonian Association of Journalists. As a result, **the current draft law on countering SLAPPs includes a reference to the Council of Europe Recommendation.**

Poland

Following the request of the Ministry of Justice of Poland, the Division has provided the Council of Europe Legal Opinion on the Draft Law of Poland “On the protection of persons participating in public participation from manifestly unfounded claims or abusive court proceedings”. After the above-mentioned draft Law was submitted for the public consultations, the Division has provided a follow-up opinion for the civil society, addressing the compliance of the draft with the initial recommendations.

A Council of Europe Peer-to-Peer exchange on the legislation to counter SLAPPs and judicial reforms in the context of media freedom and freedom of expression was organised in Warsaw with participation of judges and relevant public officials from Poland, Ukraine, Montenegro, and Kosovo¹⁷. As a result, **the current draft law on countering SLAPPs includes a reference to the Council of Europe Recommendation.**

Exiled Belarusian journalists and media

Several capacity-building and other activities supporting exiled Belarusian journalists and media have been implemented throughout 2025. Thanks to the Council of Europe support, the exiled Belarusian “Belsat TV” was able to produce quality content, including a series of 12 documentaries “Eurobelarusians”, which presented a unique and personal view of life in European nations through the perspective of Belarusians who now call these countries home. Beyond offering insights into everyday life abroad, this project highlighted broader themes of human rights, democracy, and the severe repression of Belarusian journalists. The reputable Belarusian “Vyasna” human rights centre was supported in producing a documentary about life of families of imprisoned journalists in Belarus. A series of 4 animated videos aimed at drawing attention to imprisoned journalists was produced and published, including on Council of Europe websites. The Division also supported a series of podcasts and newsletters by the popular *Mediashaba* platform and jointly with the Lithuanian Association of Journalists and Belarusian Association of Journalists (BAJ) organised the Forum of Belarusian journalists in exile “Security in conditions of insecurity: how journalists and the media should act” with

¹⁷ *All references to Kosovo, whether the territory, institutions or population, in this text shall be understood in full compliance with United Nations' Security Council Resolution 1244 and without prejudice to the status of Kosovo.

participation of more than 60 people. Belarusian journalists were also able to participate in various international events, including the World Forum for Democracy, EuroDIG, and a conference on countering disinformation in Malta.

Western Balkans – Regional Level

In 2025, the Regional Action “Protecting Freedom of Expression and Media in the Western Balkans (PROFREX)” focused on supporting:

Regulatory Authorities: a [Regional Peer Exchange](#) of media Regulatory Authorities from the Western Balkan PROFREX beneficiaries was organised in Athens on 9 October. Titled *Regulatory Approaches to Harmful Content Online: Towards Alignment with European Standards*, it followed up on a [2024 Regional Exchange](#), which resulted in a [Report](#) emphasising the importance of regional cooperation and providing tailored recommendations to strengthen the work of the Regulatory Authorities across the region. The Athens meeting offered a further opportunity to share experiences, identify challenges, and explore avenues for cooperation. Participants discussed the growing complexity of regulating harmful content online — from disinformation and algorithmic amplification to online abuse — and exchanged with their counterparts from Greece and Italy on practical and institutional approaches to these issues. The exchanges underscored the importance of maintaining a human rights perspective while enhancing transparency, accountability, and user protection in the digital environment.

Countering the use of SLAPPs: the Division’s [Training Programme on Countering the use of SLAPPs](#), developed through the Regional project in 2024, has been presented to heads and high-level representatives from Judicial Training Institutions of the Western Balkans PROFREX beneficiaries on 19-20 November in Podgorica, Montenegro. The Regional event provided a space to explore opportunities for integrating freedom of expression and SLAPP-related content into standard training offers for judges and prosecutors, and to foster a common understanding of the judiciary’s role in upholding freedom of expression. The event contributed to strengthening the regional dialogue and cooperation among judicial academies, facilitating peer exchange on curriculum development and domestic training strategies.

It is worth noting that the documents, training programmes, studies, and tools developed by the Regional Project in 2024 have been widely disseminated and utilised by other countries and beneficiaries throughout 2025.

Western Balkans – Beneficiary Level:

Albania

The Division for Cooperation on Freedom of Expression implements two distinct projects in Albania:

- Protecting Freedom of Expression and of the Media in Albania ([PROFLEX-A](#))
- Promoting Freedom of Expression in Albania through [Open Dialogue](#)

In 2025, [PROFLEX-A](#) delivered a total of 11 structured activities involving over 230 participants across Albania, contributing directly to strengthening media freedom, the safety of journalists, and alignment with European standards under Albania’s EU accession framework (Chapter 23 – Judiciary and Fundamental Rights). Activities engaged key institutional stakeholders, including the School of Magistrates, Bar Association, State Police, Audiovisual Media Authority (AMA), civil society, and media organisations. The action collaborated with civil society organisations in co-sponsoring two roundtable discussions on the safety of journalists.

Seven trainings were organised for legal professionals, law enforcement officers, and journalists, reaching around 130 participants. These trainings enhanced participants’ skills in countering SLAPPs, protection of journalists, court reporting ethics, and the application of EU and Council of Europe legal standards, including the anti-SLAPP Directive and ECtHR jurisprudence. They also strengthened the capacity of the media regulator in preparing to transpose the European Media Freedom Act (EMFA) and the Digital Services Act (DSA) into Albania’s media framework.

In addition, four multistakeholder dialogue roundtables and consultations were held, gathering around 100 participants from policymaking institutions, law enforcement, civil society, media, and the judiciary. These meetings fostered cross-sector trust, advanced anti-SLAPP policies, endorsed journalist safety protocols, and strengthened institutional co-operation. The project increased judicial capacity to counter SLAPPs, with judges and prosecutors strengthening their ability to apply European Union and Council of Europe standards to identify and dismiss abusive lawsuits.

The project contributed to improved legal and ethical reporting standards, as journalists received practical training on responsible court and legal reporting, leading to greater accuracy and a reduced risk of legal violations. Institutional uptake of journalist

protection protocols was achieved through police training, which resulted in its integration into both pre-service and in-service training curricula.

The Audiovisual Media Authority (AMA), together with government representatives and international experts, took part in a specialised workshop to examine the requirements of the European Media Freedom Act (EMFA) and the Digital Services Act (DSA). Through expert-led sessions and group exercises, participants identified legislative gaps and agreed on a practical outline to guide their transposition into Albania's media framework, thereby strengthening regulatory readiness.

The project also broadened civic dialogue on hate speech and media literacy through a multi-stakeholder roundtable in Tirana, gathering the media regulator, equality bodies, civil society, media organisations, and educators. Participants reviewed key challenges, clarified institutional responsibilities, and identified ways to strengthen co-operation, laying the basis for future educational initiatives, regulatory measures, and awareness campaigns.

Together, these interventions reinforced Albania's capacity to defend media freedom – a core priority under the EU accession process.

Started in 2025, the project [Promoting Freedom of Expression in Albania through Open Dialogue](#) is implemented in cooperation with the Department of Journalism and Communication at the University of Tirana. Several thematic Working Group meetings were organised bringing together media representatives, public institutions, civil society, and academia to discuss key issues related to freedom of expression and media freedom in Albania. The meetings combined international and national expertise to analyse the Albanian media landscape, considering EU integration commitments and Council of Europe standards. As a result, **concrete recommendations were prepared** and provided to the government and parliament on the protection of journalists, access to information and media ownership, preventing media market concentration, safeguarding editorial independence, promoting transparency in advertising and the allocation of state advertising, and strengthening the independence and capacity of the National Media Regulator (AMA). Following this, the parliamentary committee on human rights and media informed that it **created working groups and requested further support to amend the legislation** accordingly.

Montenegro

The PROFREX-M project helped advance transparency, accountability, and cooperation between the judiciary, media, and relevant state institutions in Montenegro. Through a series of targeted activities, the project strengthened communication practices, built professional capacities, and supported legislative and ethical frameworks aligned with European standards.

Three consecutive workshops brought together state prosecutors and journalists to foster open dialogue and mutual understanding. These sessions directly enhanced transparency in prosecutorial communication and improved media reporting on judicial matters. Participants jointly developed practical recommendations to sustain regular exchanges and accurate public communication.

A dedicated communication skills training for judges serving as court public relations officers equipped participants with modern communication tools and strategies. Judges strengthened their ability to engage with the public and media in a clear, transparent, and responsible manner, reinforcing public trust in the judiciary.

Two peer-to-peer exchanges were organised. The first one, between Montenegro and Kosovo, focused on countering Strategic Lawsuits Against Public Participation (SLAPPs). Judicial and media professionals shared practical approaches to protect freedom of expression and prevent misuse of the legal system. The second exchange, during a study visit to Poland, provided Montenegrin participants with an opportunity to exchange on drafting of the anti-SLAPP legislation with three other delegations.

A training on Free Access to Information empowered public officials to apply international standards in information disclosure. As a result, the national Human Resources Management Agency decided to adopt this programme, ensuring its continued implementation in the Montenegrin public administration training system.

The project also provided technical support to the Ministry of Culture and Media to transpose the Digital Services Act (DSA) and European Media Freedom Act (EMFA) into national legislation, advancing Montenegro's alignment with the EU's digital and media governance framework.

Finally, PROFREX supported media professionals in updating the national Code of Ethics for Journalists, ensuring that it reflects the latest developments in media freedom, online

journalism, and digital accountability. This collaborative process strengthened self-regulation mechanisms and reaffirmed the media sector's commitment to professional integrity.

Through these results, the PROFREX project has reinforced dialogue, institutional cooperation, and legal harmonization, contributing to a more transparent, accountable, and resilient media and justice ecosystem in Montenegro.

North Macedonia

As a result of the activities organised by the PRO-FREX project, the Academy for Judges and Public Prosecutors was supported in delivering cascade trainings on freedom of expression and SLAPPs. These included 3 training sessions: for judges and public prosecutors, a joint training in collaboration with the anti-discrimination project and Romalítico CSO, merging anti-Romani discrimination with hate speech and Freedom of Expression, and a combined training for civil judges and lawyers on defamation and SLAPPs. At least 80 judges and public prosecutors have been trained.

Collaboration with the Bar Association was expanded through two tutored HELP courses for over 60 lawyers on freedom of expression and the protection and safety of journalists, complemented by participation in the joint training with civil judges and a three-day specialised SLAPPs training for lawyers and journalists.

An analysis of administrative courts' case law on access to information was prepared and subsequently presented and discussed during a roundtable with a wide community of stakeholders, contributing to legislative reforms and further aligning national law with the Tromsø Convention. Building on these findings and the Training programme on access to information, a specialised training on access to public information was delivered to civil servants from ministries, government bodies, and the Prime Minister's Office responsible for providing public information.

In parallel, the impact of artificial intelligence on media was examined in a dedicated analysis, providing a direct assessment of the current landscape in North Macedonia.

Building on last year's ratification of the Tromsø Convention and utilising the training module on access to information for legal professionals, journalists, and civil servants, a specialised training on access to public information was delivered to civil servants from

ministries, government bodies, and the Prime Minister’s Office responsible for providing public information.

Following the three-day anti-SLAPPs training for journalists and lawyers, clear and practical Guidelines on SLAPPs for journalists were developed. These guidelines aim to inform journalists about the SLAPPs environment, how to recognise SLAPP lawsuits, and practical measures for self-protection.

A specialised police training on gender-based violence and online threats was organised, and inter-ministerial cooperation was reinforced through the “Journalists Matter” Campaign. These activities contributed to the development of a future National Action Plan for the Safety of Journalists and strengthened alignment with Council of Europe standards.

Bosnia and Herzegovina

The Division for Cooperation on Freedom of Expression implements two distinct projects in Bosnia and Herzegovina:

- Enhancing institutional capacities on freedom of expression and information in Bosnia and Herzegovina ([EFEx](#)) – ending on 31 December 2025.
- Protecting Freedom of Expression and of the Media in Bosnia and Herzegovina ([PROFEX-BH](#)).

The [EFEX](#) project’s key achievement is the establishment and two years of continuous work of the Cross-Coordinating Working Group, uniting 14 institutions, civil society organisations, and independent bodies. The Group enhanced human rights-based monitoring and reporting, producing the **first collaborative Pilot Report on Freedom of Expression and Information** submitted to the Council of Ministers of Bosnia and Herzegovina. Furthermore, the Group redefined its mandate to focus on journalist safety and began developing a strategic framework and action plan aligned with the Council of Europe’s Journalists Matter campaign. The project also organised a conference with over 40 representatives from media, institutions, and civil society, as well as joint activities with prosecutors and police officers acting as focal points for journalist protection. In cooperation with academia, a research paper assessed preventive measures, legal protection, and support mechanisms for journalists, with attention to SLAPP cases and cooperation with law enforcement. EFEX published a Guide on Limiting the Use of Criminal Law to Restrict Freedom of Expression, summarising ECtHR case law and

warning against disproportionate sanctions. A major sustainable outcome is the online Access to Information course, developed with the Civil Service Agency of BiH, which remains publicly available as a lasting educational resource. Around 80 representatives from institutions, independent bodies, and civil society participated in EFEX trainings on media regulation, access to information, defamation, SLAPPs, and online expression, strengthening capacities for a safer and freer environment.

Within [PRO-FREX](#), over 150 professionals - judges, prosecutors, police officers, lawyers, and journalists - enhanced their capacities on journalist safety, defamation, SLAPPs, and whistle-blower protection through five training sessions organised with judicial education centres. Gender mainstreaming was integrated throughout capacity-building, strengthening the capacity of 23 prosecutors, police officers, and 24 journalists to address and prevent gender-based violence against journalists, especially women, including in digital spaces. The previous JUFREX 2 study on defamation cases (2019–2022) was updated to include new cases, particularly those following the recriminalisation of defamation in Republika Srpska (2023–mid-2025). The media community and CSOs strengthened awareness and tools for journalist protection through the Study on the Safety of Journalists in BiH and related Council of Europe recommendations, offering guidance to both media and decision-makers on state obligations, legal frameworks, and steps to improve protection.

Twenty staff members of the Communications Regulatory Agency enhanced their skills on addressing harmful online content through an exchange with Ofcom, the UK regulator. Key topics included disinformation, hate speech, media literacy, and online content regulation, highlighting the importance of cooperation between regulators, media, and civil society.

Finally, a joint [PROFLEX/EFEX](#) conference on defamation and SLAPPs gathered 50 representatives from the judiciary, media, and institutions, promoting a multistakeholder approach to media freedom.

Serbia

In 2025, the Action *Protecting Freedom of Expression and of the Media in Serbia* ([PROFLEX-S](#)) delivered measurable results in strengthening media regulation, judicial practice, and professional standards. A national dialogue on the co-regulation of commercial advertising potentially harmful to minors was launched, led by the Regulatory Authority for Electronic Media (REM). The initiative reflected REM's growing

institutional maturity and alignment with Article 28 of the Audiovisual Media Services Directive (AVMSD), which promotes co-regulatory mechanisms to protect minors from harmful content. Representatives of public service and commercial media, advertising associations, and civil society organisations actively supported the initiative. REM's professional staff enhanced their capacity to apply ECtHR jurisprudence on hate speech and harmful content through a specialised training delivered in May. The programme, enriched by the participation of the Irish media regulator *Coimisiún na Meán*, provided practical insight into online safety frameworks and comparative European practices. This development directly supported the implementation of the amended Law on Electronic Media (Article 71), improving rights-based enforcement of media regulation.

The Action also advanced efforts to counter Strategic Lawsuits Against Public Participation (SLAPPs). A training for senior judges and civil society representatives introduced European standards under Council of Europe Recommendation CM/Rec(2024)2 and EU Directive (EU) 2024/1069, leading to a joint proposal for the application of Article 9 of the Law on Civil Procedure **as a legal basis for early dismissal of abusive lawsuits**. Complementary to this, the Action supported the Anti-SLAPP Conference in Belgrade, where a Council of Europe expert presented findings from the Regional Baseline Assessment on SLAPPs, identifying gaps and proposing targeted legislative reforms. In cooperation with the Forum of Judges, the Action co-organised a panel on Countering SLAPPs and disseminated CM Recommendation(2024)2 to 41 members of the judiciary.

To strengthen equality and ethical journalism, the Action implemented a Workshop on Gender-Sensitive Reporting with the Journalists Association of Serbia (JAS), training journalists and journalism students to identify and counter gender stereotypes in media content. The Action also produced a **Guide on Gender Sensitive Reporting** to be included in the curriculum of the JAS School of Journalism, reinforcing its alignment with human rights and media ethics frameworks.

Furthering regional cooperation, the Action co-organised the Regional Conference on Safety of Journalists in Belgrade, which gathered over 100 participants, including journalists' associations, judges, civil society, and international partners. The event fostered exchange of experience, solidarity, and joint reflection on improving the safety and working conditions of journalists.

Finally, the Action produced the **Guide for Legal Professionals on Freedom of Expression, SLAPPs and Related ECHR Standards**, offering practical tools for judges,

lawyers, and journalists' associations to identify and respond to abusive litigation. The publication complements regional training efforts and contributes to safeguarding freedom of expression and strengthening judicial protection of journalists in Serbia.

Kosovo

In 2025, the Action consolidated its efforts to strengthen judicial capacities, advance media regulation, and foster inter-institutional dialogue on freedom of expression. A highlevel conference, organised in cooperation with the Academy of Justice, brought together judges, prosecutors, journalists, and civil-society representatives to discuss the judiciary's role in safeguarding media freedom and countering SLAPPs. The event served as a national platform for dialogue on judicial accountability and public-interest reporting, reinforcing the judiciary's engagement with European standards and promoting stronger collaboration between legal and media communities.

Targeted capacity-building activities were carried out with both the Kosovo Bar Association and the Basic Prosecution of Pristina, enhancing the practical understanding of defamation, SLAPPs, and journalist safety among lawyers and prosecutors.

Building on the earlier bilateral institutional exchange between Kosovo and Montenegro, the Action strengthened the judiciary's capacity to address SLAPPs by expanding this exchange into a four-delegation peer-to-peer format, including also Poland and Ukraine. Kosovo judges were able to situate their reform efforts within a wider European context, gaining practical insights from Poland's anti-SLAPP draft legislation and from ongoing processes in Montenegro and Ukraine. This comparative learning increased their understanding of procedural safeguards such as early dismissal, allocation of costs, burden of proof, and victim protection, and linked these elements directly to European standards, notably the Council of Europe Recommendation CM/Rec(2024)2 and the EU Anti-SLAPP Directive 2024/1069.

The Council of Europe **Legal Opinion, provided by the Action, impacted the Constitutional Court's ruling, which declared the Law on the Independent Media Commission (IMC) unconstitutional.** The Action supported a multi-stakeholder roundtable with IMC members, journalists, civil-society actors, and institutional partners to discuss the judgment's implications and the reform path forward. The Prime Minister's Office expressed readiness to coordinate an inclusive legislative process once the political context allows, reaffirming Kosovo's commitment to aligning the IMC framework with the EU Digital Services Act and Audiovisual Media Services Directive.

A workshop on access to information and court communication with the Kosovo Judicial Council (KJC) produced a strong result: **it influenced the KJC's decisions regarding what information to publish online and how the guidelines on access to information should be designed.** As a result of the workshop, they also decided to publish more information on their website.

Other activities included cooperation with the Association of Journalists of Kosovo (AGK) in marking World Press Freedom Day, a visit of Albanian and Serbian journalists from Kosovo to Strasbourg, the translation of the Guide on the Use of Criminal Law to Restrict Freedom of Expression into Albanian and Serbian and the integration of freedom of expression into the 2025 curriculum of the Academy of Justice, ensuring sustainability and institutional ownership. Judicial Dialogue on Freedom of Expression Standards and Hate Speech was implemented jointly with other Council of Europe actions in Kosovo.

Overall, in 2025, PROFREX implemented 18 activities, three of which were organised in cooperation with other Council of Europe initiatives.

Moving Forward

The Division for Cooperation on Freedom of Expression made progress in 2025, promoting the protection of information integrity, safety of journalists, freedom of expression, media pluralism, and access to information across the Member States. It has contributed to the development of legal frameworks, strengthened the capacities of media and legal professionals, raised awareness, and fostered international cooperation to uphold European standards in the media, legal, and political landscapes.

The Division will continue its work in 2026 with a focus on contributing to the [New Democratic Pact for Europe](#); implementation of the new guidance from CDMSI on countering disinformation, national media literacy strategies, online safety, and impact of AI on media; implementing projects on building resilience to disinformation, countering SLAPPs, improving access to information, supporting public service media, strengthening media regulations, and ensuring the safety of journalists in challenging environments.

An International Conference on promoting media literacy and countering disinformation will be organised in cooperation with the CDMSI and the Moldovan Presidency of the Committee of Ministers of the Council of Europe in March 2026.

While almost all of the projects mentioned above will continue in 2026, the Division will remain open to new requests from the member states. **Two new projects** “Promoting Freedom of Expression, Media and Access to Information in **Armenia**” and “Enhancing Freedom of Expression in **Georgia** through Resilient Institutions and Media” are expected to be launched in early 2026. Several other new projects and activities are planned, including trainings and legislative assistance to counter SLAPPs in Poland, Estonia, Bulgaria, and Finland.

Additionally, the Division will continue contributing to the implementation of the ‘Journalists Matter’ Campaign in the Council of Europe member states, focusing on the safety of women journalists and on raising awareness of attacks on the media.

The Division will keep working on the issues related to the environmental SLAPPs, access to information on the environment, and the role of investigative and “green” journalism in environmental protection. It will also continue supporting the dialogue with digital platforms and media regulators via a series of discussions on countering disinformation and harmful content online, including at the 2026 session of the European Dialogue on Internet Governance.

The Division can be contacted at foe.cooperation@coe.int for any assistance requests.

Appendix

Policy Advice, Legal Opinions, and other documents prepared in 2025:

1. Legal Opinion on the Amendments to the Audiovisual Media Code, the Law “On Media” and the new provisions of the Law “On Advertising” of the Republic of Moldova
2. Legal Opinion on the Draft Law of Poland on the protection of persons participating in public participation from manifestly unfounded claims or abusive court proceedings
3. Legal Opinion on the Draft Law of Poland on the protection of persons participating in public participation from manifestly unfounded claims or abusive court proceedings (follow up for the civil society)
4. Legal Opinion on the Draft Law of Ukraine “On Amendments to Certain Laws on Media Activity”
5. Legal Opinion on the Draft Law of Ukraine “On Amending the Law of Ukraine “On Advertising” and Other Laws of Ukraine
6. Legal Opinion on the Draft Law of Ukraine “On the Protection of Citizens’ Rights to Reliable Information and Ensuring Information Security, Carried Out by the National Regulator”
7. Assessment of the position of the National Union of Journalists of Ukraine (NUJU) on Draft Law on Amendments to Certain Laws of Ukraine on Media Activities (Registration No. 12111)
8. Legal Opinion on the Draft Law of Ukraine "On Amendments to Certain Laws of Ukraine Regarding Strengthening Certain Guarantees for the Activities of Media and Journalists and Ensuring the Right of Citizens to Access Information"
9. Legal Opinion on Amendments to the Draft Law of Ukraine “On Amendments to Certain Laws of Ukraine Regarding Media Activities: Strengthening Information Sovereignty and Media Regulation”
10. Legal Opinion on the Draft Law of Ukraine "On Amendments to the Code of Ukraine on Administrative Offenses, the Criminal and Criminal Procedure Codes of Ukraine to Ensure Compliance with the Guarantees of Advocacy"
11. Legal Opinion on the Draft Law of Ukraine “On Amendments to the Criminal Code of Ukraine Regarding the Establishment of Criminal Liability for Unauthorised Interference, Sale, or Distribution of Information Processed in Public Electronic

Registers and Strengthening Criminal Liability During Martial Law for Criminal Offenses in the Sphere of Using Information and Communication Systems”

12. Legal Opinion on the Draft Law of Ukraine “On Amending Certain Laws of Ukraine Regarding the Regulation of Activities of Information-Sharing Platforms through which Mass Information is Disseminated
13. Legal analysis of complaints concerning non-compliance with ethical and professional standards of journalism submitted to the Commission on Journalistic Ethics of Ukraine (CJE).
14. The Draft Criminal Code and the Safety of Journalists in Albania: Recommendations for an alignment with European standards
15. Policy Advice on Aligning Albania’s Media Landscape with European Standards: Legal and Institutional Reforms on Media Concentration, Transparency, Regulation, and Public Service Media
16. Legal Opinion on Amendments to the Electoral Code of Ukraine regarding the improvement of the regulation of information provision for elections and the conduct of pre-election agitation
17. Responding to strategic lawsuits against public participation (SLAPPs): Guide for legal professionals on freedom of expression cases