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Protecting Freedom of Expression and of the Media in the Western Balkans PRO-FREX

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Report

Strengthening Judicial Responses to Strategic Lawsuits Against Public Participation (SLAPPs) in the Western Balkans

Western Balkans Regional Exchange on Judicial Training on countering the use of SLAPPs

Podgorica, Montenegro

19-20 November 2025

Council of Europe
Division for Cooperation on Freedom of Expression

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The role and responsibility of the Council of Europe in protecting freedom of expression has been underlined in the "Reykjavik Principles for Democracy", the [Reykjavík Declaration – United around our values](#).

The report was prepared within the Regional action ‘Protecting Freedom of Expression and of the media in the Western Balkans’ (PRO-FREX) that enables the beneficiary institutions and civil society organisations to progress towards meeting their reform agendas in the field of freedom of expression and freedom of media, in line with the European standards.

The action is implemented by the [Division for Cooperation on Freedom of Expression](#) within the joint Programme of the European Union and Council of Europe “Horizontal Facility for the Western Balkans and Türkiye” running from 2023 to 2026, and which aims to contribute to an improved environment for the exercise, by all stakeholders in particular by journalists and media actors, of their rights of freedom of expression, in a more pluralistic and safer media environment, in line with the standards as set by in accordance with Article 10 of the European Convention of Human Rights (ECHR).

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1. INTRODUCTION

The Regional Exchange “Strengthening Judicial Responses to Strategic Lawsuits Against Public Participation (SLAPPs) in the Western Balkans” took place in Podgorica on 19–20 November 2025. The event was organised under the regional action “Protecting freedom of expression and of the media in the Western Balkans (PRO-FREX)”, which is part of the joint European Union–Council of Europe programme “Horizontal Facility for the Western Balkans 2023–2026”.

The event provided an opportunity to present the recently launched [Council of Europe Training Programme on Countering the Use of SLAPPs](#) to the Judicial Training Institutions and Academies from all six Western Balkan beneficiaries. It also offered space to explore opportunities for integrating SLAPP-related content into standard training programmes for judges, prosecutors, lawyers and police officers, and to foster a common understanding of the judiciary’s role in upholding freedom of expression.

This report provides information on updates shared by the beneficiaries of PRO-FREX, discussions and conclusions regarding the integration of the Council of Europe Training Programme on countering the use of SLAPPs, upcoming activities, and, most importantly, suggestions for the project’s follow-up activities.

2. PRESENTATION OF THE COUNCIL OF EUROPE TRAINING PROGRAMME ON COUNTERING THE USE OF SLAPPS AND OTHER STANDARDS-SETTING LEGAL RESOURCES

Council of Europe experts Flutura Kusari and Aneta Spaic presented recent Council of Europe documents that serve as valuable tools for beneficiaries in building the capacities of judges, prosecutors, and legal professionals. The presentation combined an overview of standards on SLAPPs with a detailed introduction to the [Council of Europe Training programme on countering the use of SLAPPs](#). It also highlighted the [Regional Baseline Assessment - a regional legal study](#)

identifying solutions for transposing and implementing anti-SLAPP measures, as well as new key legal resources, including the [Guide for Legal Professionals on Freedom of Expression, SLAPPs and Related ECHR Standards](#) and the [Guide on Limiting the Use of Criminal Law to Restrict Freedom of Expression](#).

3. UPDATES FROM BENEFICIARIES

Representatives of beneficiary institutions presented updates and highlighted the impact of PRO-FREX activities, particularly the capacity-building efforts for judges, prosecutors, and other legal professionals. Beneficiaries also emphasised the high quality of the trainings and training materials provided through PRO-FREX, elaborating in detail how these efforts have strengthened judicial knowledge of European Union, Council of Europe, and European Court of Human Rights standards on media freedom. The updates reflected both the achievements to date and the ongoing commitment of beneficiary institutions to continue advancing freedom of expression and protecting journalists at the domestic level.

Albania

The representative of Albania highlighted the excellent partnership with the Council of Europe on issues related to the safety of journalists, media freedom, and SLAPPs. This cooperation has strengthened domestic training efforts and benefited from high-quality expert input and training materials. Thirty-six judges and prosecutors have been trained on SLAPPs within one year.

Regarding sustainability, the Training of Trainers (ToT) held in Golem, Durrës created a local pool of 14 trained professionals, enabling the School of Magistrates to deliver SLAPP-related trainings independently. These trainers now form the basis for applying anti-SLAPP standards across the judiciary.

The School of Magistrates has formally incorporated the topic of SLAPPs into its continuous training curriculum, based on materials developed by the Council of Europe. It now hosts its own SLAPP-

related training sessions, ensuring domestic ownership and continuity. The next training on SLAPPs is scheduled for 3 December 2025, and one of the trainers was trained through PRO-FREX. The school also contributes to Albania's EU integration efforts, particularly by strengthening the safety of journalists.

Bosnia and Herzegovina - (two training centres presented jointly)

The Centre for Judicial and Prosecutorial Training of Republika Srpska reported that hate speech, media freedom, SLAPPs, and defamation remain key topics addressed through trainings delivered in cooperation with the Council of Europe. Several activities have been developed, including ToT sessions on hate speech, defamation, SLAPPs, media freedom, and the protection of whistle-blowers.

Next year, the centres plan to hold trainings on the protection of journalists and whistle-blowers, as well as on SLAPPs and defamation. These will be organised for judges and for focal points in prosecutorial offices. The impact of these activities is reflected in increased knowledge and better understanding of Council of Europe standards. The centres expect that further strengthening of capacities will support a more consistent implementation of ECtHR case law.

*Kosovo**

The representative from Kosovo* stated that PRO-FREX is one of the most successful projects the Academy has worked with. The Academy remains fully committed to freedom of expression as part of its long-term training strategy. Civil society organisations and journalists are included during the implementation of PRO-FREX, which helps build trust among all stakeholders, an essential element for safeguarding the safety of journalists. Since 2017, the Academy has trained judges and prosecutors and certified trainers who later became multipliers by integrating media freedom topics

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ opinion on the Kosovo Declaration of Independence.

into regular judicial training. The ToT was a certified programme ensuring sustainability. The Academy frequently includes police officers and journalists in its activities and has organised roundtables on defamation and access to information, including with PRO-FREX support.

The Academy has integrated the Anti-SLAPP training curriculum into its training materials, based on materials developed by the Council of Europe. Between 2022 and 2025, a total of 232 participants were trained. The Academy remains committed to continuing capacity building and highly values its partnership with the Council of Europe Office in Prishtina.

Montenegro

The representative of the Centre for Training in Judiciary and State Prosecution of Montenegro noted that around 18 training sessions were conducted with the support of JUFREX and PROFREX, involving a total of 340 participants. Topics covered included defamation and SLAPPs. Through JUFREX, the *Centre* received a quality training program, successfully trained local trainers from among judges and state prosecutors, as well as lawyers. Total of 18 national training sessions were conducted with a total of 340 participants. PROFREX-M followed-up the JUFREX projects by significantly improve the capacities of the Centre as a national institution for training judges and state prosecutors concerning education on freedom of expression and media freedom. Three training sessions in 2024 resulted in total of 83 participants (26 journalists, 20 prosecutors, and 37 judges and advisors). The Centre, within the framework PRO-FREX-M, organised a training session for judges and state prosecutors on the topic Article 10 of the European Convention on Human Rights – Freedom of Expression, including the lecture on countering the SLAPP.

North Macedonia

The representative of the Academy for Judges and Public Prosecutors (AJPP) stated that the focus remains on continuous training, application of European standards, and the need for specialised modules. A total of 84 events were organised on freedom of expression, 17 of them in collaboration with JUFREX and PRO-FREX. Topics covered included freedom of expression and ToT activities.

Outputs include a training handbook, with two editions published to date. Future plans involve developing a network of specialised judges trained in anti-SLAPP indicators.

Serbia

The representative noted that while Serbia does not yet have extensive experience in SLAPP-related training, there is a clear and growing need, especially regarding the prevention of abuse of court procedures. Several practical cases were discussed, especially in the context of evolving legislation. Another representative emphasised how the Judicial Academy has benefited from PRO-FREX: high-quality training materials have been developed and remain in use; a pool of experts has been established and expanded; and peer-to-peer training has helped legal professionals apply relevant standards in their daily practice.

Further cooperation between PROFREX and the Judicial Academy is foreseen for 2026 and will be discussed in December 2025 at the Horizontal Facility Beneficiary Steering Committee Meeting.

4. INTEGRATION OF THE COUNCIL OF EUROPE SLAPP TRAINING PROGRAMME BY BENEFICIARIES

Following the launch of the Council of Europe Training Programme on countering the use of SLAPPs, participants from all beneficiary institutions discussed how to integrate the SLAPP Programme into their respective training academies and centres. It should be noted that the participants, many of whom hold decision-making positions, expressed strong interest in, and a clear commitment to, incorporating the Council of Europe SLAPP curriculum into their existing training programmes. Based on the inputs provided by the beneficiaries present at the event, and taking into account their training frameworks **the following approaches have been proposed for integrating the SLAPP training programme:**

Initial training – SLAPP training would be integrated into the training programme for newly appointed judges and prosecutors. The training would last between one and two days, depending on the time

available, and would be based fully on the Council of Europe Training Programme on SLAPPs. It would follow the established methodology and would be delivered by local experts as well as international experts to ensure that international expertise is adequately shared with participants.

Continuous in-service training – SLAPP training would also be incorporated into continuous in-service training programmes. Similarly to the initial training, the sessions would last between one and two days, depending on the time available, and would be based on the Council of Europe Training Programme on SLAPPs and on the existing methodology. The training would be delivered by both local and international experts to ensure the effective transfer of international expertise.

Advanced tailored training on SLAPPs for domestic judges and prosecutors – Advanced SLAPP training would be organised at least once a year as a standalone programme to ensure that judges and prosecutors receive advance knowledge on SLAPPs. The training would last three days and include the entire Council of Europe SLAPP Training Programme, along with testimony from a SLAPP victim, and, when possible, conclude with a mini moot court. The programme would also include domestic practice (relevant existing cases on abuse of process and other case law) and would be delivered by at least three experts, a combination of local and international experts.

5. UPCOMING ACTIVITIES OF BENEFICIARIES

The following section outlines the activities of beneficiary institutions that are either planned or currently under discussion in relation to capacity-building on media freedom and SLAPPs standards. During the consultations, each beneficiary identified concrete steps, ranging from scheduled training sessions and curriculum adjustments to proposals for regional events, aimed at strengthening domestic capacity to address SLAPPs.

Albania

A training session on SLAPPs is already scheduled for 3 December 2025. Representatives mentioned the possibility of organising a three-day activity focused on SLAPPs for 2026, although the timing has not yet been specified.

Bosnia and Herzegovina

In Bosnia and Herzegovina, a training will be held for [focal points of the Campaign for the Safety of Journalists](#) and prosecutors on the safety of journalists, and another training will be organised for judges on media freedom and SLAPP. Representatives expressed interest in organising SLAPP-related training, conditional upon the availability of adequate funding. Moot courts were highlighted as a highly relevant training methodology. SLAPP-related in-service training is expected to be incorporated into the performance evaluation framework for judges and prosecutors. It is not currently possible to include SLAPP training within the initial training Programme, which remains fixed; however, provisions exist for supplementary training to enhance professional competencies relevant to anti-SLAPP measures.

*Kosovo**

The Academy has planned at least one training on SLAPPs for 2026 and one on defamation. It was noted that training materials require high-quality translation and adaptation to ensure alignment with Kosovo's* legal context. In May next year, the Academy will hold its second annual meeting on Media Freedom and the Justice System, where the topic of SLAPPs will receive dedicated focus. Furthermore, the Academy, in collaboration with the local Council of Europe PRO-FREX project, plans to prepare and publish a comprehensive publication on defamation cases—the largest of its kind in its history. This publication will support judges in further developing judicial practice and will serve as an important resource for training legal professionals on media freedom, SLAPPs, and defamation.

Montenegro

The Centre currently includes Article 10-related training within its in-service training Programme for judges and state prosecutors. The Academy also plans to introduce dedicated SLAPP training in the future [to be confirmed].

North Macedonia

Plans are underway to organise a Training of Trainers (ToT) on SLAPPs and to establish a network of specialised judges on media freedom. Initial and continuous training sessions are typically delivered between January and June 2026, with one-day training activities conducted between July and December by local experts.

Serbia

Representatives suggested integrating SLAPP-related content into HELP courses and other continuous training programs. A regional ToT was considered highly relevant for an introductory phase of SLAPP-related training, as participants may not yet have been exposed to this topic. A regional training-of-trainers initiative could therefore have a particularly strong impact.

6. SUGGESTED ACTIVITIES AND FOLLOW-UP

This section provides activities and follow-up which could be implemented or supported at the domestic and regional levels.

Regional ToT and/or Regional Conference on SLAPPs and/or Access to information – It was discussed that PROFREX could support the organisation of a regional event on advanced SLAPPs training, access to information, and/or including a high-level conference on SLAPPs, access to

information, and media freedom. The purpose is to give regional prominence to the topics of media freedom, SLAPPs, and access to information, and to serve as a platform to launch the Regional Network of Specialised Judges and Prosecutors on Freedom of Expression and Media Standards (see below).

Setting up of an informal Regional Network of Specialised Judges and Prosecutors on Freedom of Expression and Media Standards (suggested name: MediaLawNet) – An informal regional network consisting of certified judges and prosecutors trained by the Council of Europe could be created. The network's purpose would be to promote judicial expertise in freedom of expression and media freedom cases, encourage the use of Council of Europe, EU, and ECtHR standards in case law, further professional development of judges and prosecutors, and promote regional collaboration.

Promotion of the Council of Europe Training Programme on countering the use of SLAPPs – Promotion could include publication of [news item](#) by Judicial Training Institutions and Academies, on the launch of the Council of Europe Training Programme on SLAPPs, including a link to the training materials and information on how to participate. This would significantly promote the training curricula at the domestic level.

Certified ToT on Media Freedom and Freedom of Expression European standards – Over nearly a decade, JUFREX and PROFREX have organised ToTs on media freedom based on the JUFREX Training Manual. However, over time, trained judges and prosecutors have moved to different positions or departments. For this reason, it was discussed to organise domestic ToTs where the number of trained judges and prosecutors remains low to ensure continuity of capacity-building efforts at the domestic level. Trained judges and prosecutors should receive certification from the Council of Europe, as it enhances their professional credentials.

Certified ToT on SLAPPs – It was discussed that beneficiaries organise each ToT on SLAPPs, as suggested by the majority of representatives of training institutions. The ToT should last three full days, be based on the Council of Europe SLAPPs training curriculum, and be delivered by at least

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one domestic and one international expert. Trained judges and prosecutors should receive Council of Europe certification to strengthen their professional credentials.

Updating the JUFREX Training Handbook on Media Freedom – The trainings for judges and prosecutors previously offered under JUFREX, and now under the PROFREX project, are based on a training manual developed at the beginning of the project and updated in 2019 (the JUFREX Training Manual). While the content remains highly relevant and has been integrated throughout regional training curricula, developments in Council of Europe and ECtHR standards, as well as EU regulations, make it necessary to update the handbook to reflect the most recent trends. Therefore, the handbook could be revised to include the latest developments at the European level.

Translation of the Council of Europe Training Programme on countering the use of SLAPPs – To integrate the SLAPP training curricula at the domestic level, translation is highly necessary, as indicated by representatives of training institutions during the event. PROFREX may be involved to facilitate or support the translation of selected training modules. It was suggested to give priority to the translation of the methodology section and the modules on introduction, presentation of European standards, indicators, and main exercises.

Development of a HELP course on SLAPPs – It was discussed that the Council of Europe could develop a HELP course on SLAPPs or include the topic in relevant existing HELP courses. The purpose would be to enable local judges, prosecutors, and lawyers to apply European standards in a practical way. Since the Training Programme on countering the use of SLAPPs has already been developed, that material can serve as a starting point for HELP integration.