ASSESSMENT OF HUNGARY'S COMPLIANCE WITH CONDITIONS TO ACCESS EUROPEAN UNION FUNDS

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EXECUTIVE SUMMARY

In December 2022, European Union institutions made Hungary's access to substantial amounts of EU funding conditional on addressing serious deficiencies in the rule of law, anti-corruption safeguards and the effective enjoyment of fundamental rights. These conditions were established through three distinct but partly overlapping mechanisms: the rule of law conditionality mechanism, the Recovery and Resilience Plan (RRP), and the horizontal enabling condition concerning the effective application and implementation of the Charter of Fundamental Rights of the European Union.

Following the change of government in the spring of 2026, Hungary's approach to meeting these conditions has fundamentally changed. The new government has undertaken substantial legislative and institutional reforms, addressing several long-standing deficiencies and demonstrating a willingness to cooperate with EU institutions. These developments represent a significant departure from the previous government's approach and have resulted in tangible progress towards meeting the conditions attached to EU funding.

An important development has been the substantial revision of Hungary's RRP. Faced with the limited time remaining before the deadlines for implementing reforms and investments under the Recovery and Resilience Facility, the new government renegotiated the plan with the European Commission. The revision streamlined and consolidated numerous milestones, adjusted the scope of certain commitments, removed some previously agreed requirements, and introduced new measures. In several areas, the revision prioritised measures that could realistically be implemented before the 31 August deadline. The revised RRP therefore reflects both the changed political circumstances and the practical constraints facing the new government. However, **the modification or removal of milestones should not be confused with the full resolution of the problems they were originally intended to address.** Some previously agreed safeguards and reform commitments have been weakened or abandoned, while the effectiveness of several newly adopted measures remains to be demonstrated in practice.

In September 2026, the **European Commission proposed lifting the measures imposed on Hungary under the rule of law conditionality mechanism**. This proposal **rightly reflects significant progress**, including important institutional reforms and new corrective measures. Nevertheless, the implementation of reforms and their ability to deliver lasting improvements will require continued attention.

The central finding of this assessment is that fulfilling the revised milestones and conditions under the conditionality mechanism and the RRP does not necessarily mean that Hungary's underlying systemic deficiencies have been fully resolved. Important shortcomings persist in the prevention and prosecution of corruption, transparency and access to public information, public procurement, the quality of law-making, and the functioning of institutions responsible for safeguarding the rule of law.

As regards the horizontal enabling condition concerning the EU Charter of Fundamental Rights, the overall situation is mixed. The assessment finds that the requirements relating to academic freedom and the rights of LGBTQI+ persons have been fulfilled, while those concerning the right to asylum and the principle of non-refoulement remain unfulfilled. In the area of judicial independence, limited positive developments have taken place since the change in government, although the

measures adopted earlier to comply with EU requirements are not sufficient to fully address the relevant concerns, as shown in detail in our previous annual assessments.

The assessment concerning LGBTQI+ rights illustrates the limits of equating compliance with previously defined conditions of the EU with the removal of all restrictions on fundamental rights. Although the government has addressed the deficiencies identified by the Commission in the relevant implementing decisions, numerous other restrictive provisions affecting LGBTQI+ persons remain in force. These provisions were not covered by the specific requirements established in those decisions. Consequently, fulfilment of the horizontal enabling condition in this area should not be understood as implying that the broader fundamental rights concerns affecting LGBTQI+ persons in Hungary have been resolved.

Overall, the developments of 2026 represent substantial progress in Hungary's compliance with the conditions attached to EU funding, although progress under the three mechanisms has been uneven. Meeting these requirements is an important achievement. But as this assessment shows, it does not mean that the broader problems affecting the rule of law and the effective enjoyment of fundamental rights in Hungary have been fully resolved.

EXECUTIVE SUMMARY *0*

ASSESSMENT OF COMPLIANCE WITH MILESTONES UNDER THE RECOVERY AND RESILIENCE PLAN AND WITH CONDITIONALITY MEASURES *4*

Integrity Authority 4
Participation in the enhanced cooperation on the establishment of the European Public Prosecutor's Office 5
Entry into force of the legislation on the Anti-Corruption Task Force 6
Introduction of a special procedure for priority offences related to the exercise of public authority or the management of public property ("judicial review") 7
Amendment of the rules on asset declarations 8
Entry into force of legislation on the transparency of the use of public funds by public interest trust foundations performing public tasks 9
Increased transparency of public spending 10
Transparency of beneficial owners 11

Procurement-related reforms **13**
Reducing the share of single-bid procedures 13
Integrity, transparency and competition in the procurement 14
EPS development for transparency 15
Performance measurement framework for public procurement 16
Action plan to increase competition in public procurement 16

Independence of the Judiciary **17**

Reforms related to the sound management of EU Funds **17**
Legislative amendments strengthening the management, monitoring, audit and control mechanisms ensuring the proper use of EU support 17
Anti-fraud and anti-corruption strategy for the implementation, audit and control of EU support 18
Arachne system for EU support 18
Establishment of a Directorate of Internal Audit and Integrity to strengthen the control of conflicts of interest in the implementation of EU support 19
Ensuring the capacity of EUTAF/DGAEF to carry out its tasks effectively 19
Cooperation with OLAF to strengthen the detection of fraud related to the implementation of EU support 20
Audit and control of the Recovery and Resilience Plan and the protection of the financial interests of the Union 20
Strengthening transparency and access to information of public interest 20
RRF Monitoring Committee 22
Public consultation on draft laws 23

Reforms of the original RRP abandoned in the new RRP **24**

ASSESSMENT OF COMPLIANCE WITH THE HORIZONTAL ENABLING CONDITION ON THE EFFECTIVE APPLICATION AND IMPLEMENTATION OF THE CHARTER OF FUNDAMENTAL RIGHTS *24*

Independence of the judiciary **24**

Academic freedom and public interest asset management foundations **25**

Right to asylum and the principle of non-refoulement **26**
Repealing the embassy system 26
Implementation of the CJEU's judgment in Case C-808/18 regarding push-backs and the rules and practices in the transit zones 27

Rights of LGBTQI+ persons **29**

ASSESSMENT OF COMPLIANCE WITH MILESTONES UNDER THE RECOVERY AND RESILIENCE PLAN AND WITH CONDITIONALITY MEASURES

Integrity Authority

The establishment of the Integrity Authority (IA) was a cornerstone commitment of the conditionality mechanism[1] and the relevant Measures (C8.R1) and milestones were incorporated into Hungary's Recovery and Resilience Plan. The number of milestones from the original RRP[2] has been reduced from six to two (**Milestones 54 and 55** dealing with the competences of the IA in the area of EU-funds and asset declarations, respectively).

The IA was set up in November 2022 at great speed under the pressure of the conditionality procedure, and with deliberate limitations.[3] However, between 2022 and 2026, the IA grew into a competent, independent, and adequately resourced institution, but it received no support from government-linked institutions, achieved no meaningful results in high-profile cases, and, partly due to general skepticism towards the state, failed to build public trust.

Act XVIII of 2026 on the amendment of certain acts necessary for access to European Union funds (hereinafter referred as Omnibus Act)[4] addressed several weaknesses identified by stakeholders. The IA now retains its competence unconditionally when a project is withdrawn from EU funding; if the Arbitration Board fails to suspend a procedure in time, the IA may turn to the courts; and courts must decide on the dismissal of its president within 60 days, with appeals having suspensive effect. The IA may also access banking, tax, and business secrets in its investigations. Its board was enlarged from three to five members; and the register of companies excluded from public procurement has been launched. Although the dedicated page on the Electronic Public Procurement System (EPS) did not yet list any company.[5] The Board of the Integrity Authority was enlarged from three to five members. Its members are selected on the basis of a ranking, from which the President of the State Audit Office may deviate only exceptionally and with a statement of reasons. (In September, the President of the State Audit Office proposed to the President of the Republic the appointment of Erika Bozzay and Gabriella Nagy-Fribiczer as vice-presidents.[6] The former worked for more than a decade at the OECD on public procurement and integrity reforms, while the latter previously worked at the IA's professional directorate.)

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[1] Commission, 'Proposal for a Council Implementing Decision on measures for the protection of the Union budget against breaches of the principles of the rule of law in Hungary' COM(2022) 485 final 7.2.1., 18 September 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52022PC0485 (accessed 14 October 2026).

[2] Original RRP: European Commission, COM(2022) 686 final and Annex, Component 9, milestones and targets 160–270, as approved by the Council in December 2022.

[3] See e.g. Integrity Authority, „Az Integritás Hatóság a jogkörei bővítését kéri" [The Integrity Authority requests the extension of its powers], 24 April 2024, https://integritashatosag.hu/az-integritas-hatosag-a-jogkorei-boviteset-keri/

[4] Act XVIII of 2026 on the amendment of certain acts necessary for access to European Union funds (2026. évi XVIII. törvény az európai uniós forrásokhoz való hozzáférés érdekében szükséges egyes törvények módosításáról; Omnibus Act), promulgated on 26 June 2026, https://njt.jog.gov.hu/jogszabaly/2026-18-00-00.0

[5] https://ekr.gov.hu/nyilvantartasok/hu/integritas

[6] Integrity Authority, „Öttagúra bővül az Integritás Hatóság Igazgatósága" [The Board of the Integrity Authority expands to five members], 1 September 2026, https://integritashatosag.hu/ottagura-bovul-az-integritas-hatosag-igazgatosaga/

In practice, the IA's position has changed less than the legislation suggests. Extended data access applies only to individual investigations: for risk analysis and screening, it still cannot access non-public databases, it has no investigative powers of its own, and where an authority refuses to release data, it can only bring a failure-to-act lawsuit, which may cause delays of several weeks. Many forward-looking proposals of the IA's annual integrity report for 2025[7], including on data access, were rejected[8] by the new government just as they had been by the previous one. The IA's credibility has also been affected by the criminal proceedings and dismissal lawsuit against its president, Ferenc Biró.[9] The Budapest-Capital Regional Court (Fővárosi Törvényszék) rejected the State Audit Office's motion to remove the President of the Integrity Authority as time-barred.[10]

Participation in the enhanced cooperation on the establishment of the European Public Prosecutor's Office

The measure (**C8.R2**) has no predecessor in the original RRP, nor was it among the remedial measures Hungary committed to under the conditionality procedure in 2022; it is one of the three new corrective measures introduced in the government's September 2026 notification.[11] The relevant **milestone (56)** itself is narrow: it is fulfilled once the Commission receives Hungary's notification of its intention to participate, provided that the notification requests that Regulation (EU) 2017/1939 apply to offenses committed on or after 1 June 2021. It does not require the EPPO to be operational in Hungary.

Accession reverses a long-standing policy. Since 2017, the Orbán government had consistently refused to participate,[12] typically citing national sovereignty and arguing that the Hungarian prosecution service and cooperation with OLAF provided sufficient protection for EU funds. This argument did not convince the Council either: in its December 2022 decision about the conditionality measures, it identified the ineffectiveness of criminal enforcement, reflected in the lack of investigations and indictments, as one of the most serious systemic problems. The government notified its intention to participate on 29 May 2026, and the Commission confirmed

[7] Integrity Authority, *2025. éves elemző integritásjelentés* [Annual Analytical Integrity Report 2025], Budapest, 30 June 2026, https://integritashatosag.hu/wp-content/uploads/2026/06/Eves-elemzo-integritasjelentes-20250630.pd

[8] Government Resolution 1285/2026. (IX. 3.) on the government's position on the findings of the Integrity Authority's annual analytical integrity report for 2025 (1285/2026. (IX. 3.) Korm. határozat az Integritás Hatóság 2025. évre vonatkozó éves elemző integritásjelentésében megfogalmazott megállapításokkal kapcsolatos kormányzati álláspontról), Magyar Közlöny 2026/124, pp. 4253–4282, https://integritashatosag.hu/wp-content/uploads/2026/09/MK_26_124_kormanyvalasz.pdf

[9] Biro cites political reasons for the procedure and recalls a story that in spring 2024, two ministers expected him to halt on-site inspections and certify the fulfillment of EU milestones.Portfolio (Szabó Dániel), „Kitálalt az állami hivatal vezetője: 60 ezer milliárd forintot lophattak el Magyarországon, két miniszter is megüzente, hogy álljon le" [Head of state office speaks out: HUF 60,000 billion may have been stolen in Hungary, two ministers told him to stop], 8 June 2026, https://www.portfolio.hu/unios-forrasok/20260608/kitalalt-az-allami-hivatal-vezetoje-60-ezer-milliard-forintot-lophattak-el-magyarorszagon-ket-miniszter-is-meguzente-hogy-alljon-le-841798

[10] Telex, „Késve indítványozta az Integritás Hatóság elnökének eltávolítását az ÁSZ" [The State Audit Office was late in moving to remove the President of the Integrity Authority], 5 October 2026, https://telex.hu/belfold/2026/10/05/integritas-hatosag-allami-szamvevoszek-biro-ferenc-pal

[11] Proposal for a COUNCIL IMPLEMENTING DECISION pursuant to Article 7(2) of Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget, concerning a written notification from Hungary with regard to Council Implementing Decision (EU) 2022/2506 of 15 December 2022 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=comnat:COM_2026_0516_FIN

[12] Index, „Orbánék nagyon nem akarják az európai ügyészséget" [Orbán's government strongly opposes the European Public Prosecutor's Office], 27 January 2017, https://index.hu/belfold/2017/01/27/orbanek_nagyon_nem_akarjak_az_europai_ugyeszseget/ ; Portfolio, „Megmagyarázta a kormány illetékese, miért nem akar csatlakozni az Európai Ügyészséghez Magyarország" [Government official explains why Hungary does not want to join the European Public Prosecutor's Office], 14 June 2022, https://www.portfolio.hu/unios-forrasok/20220614/megmagyarazta-a-kormany-illetekese-miert-nem-akar-csatlakozni-az-europai-ugyeszseghez-magyarorszag-550651

Hungary's participation by its decision of 10 July 2026.[13] At Hungary's request, the EPPO's competence extends retroactively to offenses committed after 1 June 2021, the date on which the EPPO began operating. The entire period since the 2022 conditionality decision may therefore come within its reach, including the funds of the Recovery and Resilience Facility and the 2021–2027 programming period. The Commission's proposal of 23 September 2026 for a Council decision lifting the conditionality measures against Hungary[14] (COM(2026) 516; hereinafter: the Lifting proposal). treats accession as a corrective measure of central importance which compensates for the unfulfilled commitment on a new National Anti-Corruption Strategy (which was also dropped from the Recovery and Resilience Plan).

In practice, the EPPO is not yet operational in Hungary. The national implementing rules, the appointment of European Delegated Prosecutors, and the necessary resources are still being put in place. The EPPO does not have investigators of its own: delegated prosecutors rely on national investigative authorities and bring their cases before Hungarian courts. Its effectiveness will therefore depend on how cooperative the Hungarian institutional system proves to be, including a prosecution service shaped by many years under Péter Polt's leadership.

The EPPO's competence is also limited to offenses against the EU budget. Corruption in procurement, grants, and state investment financed from domestic sources remains within national competence, where the newly created National Office for Asset Recovery and Asset Protection (NVVH) may in the longer term fill part of the gap. As the NVVH also exercises prosecutorial powers under the same procedural rules as the prosecution service, the division of competences between the prosecution service, the NVVH, and the EPPO will need to be clarified for accession to deliver the stronger criminal enforcement.

Entry into force of the legislation on the Anti-Corruption Task Force

The measure replaces Reform **C9.R2**, whose three **milestones (166–168)** are reduced to one (**milestone 57**). Several elements were altered: the 15 March deadline for the annual report (**milestone 166)** is no longer specified, the explicit mandate to address nepotism, favouritism, and revolving doors was replaced by a general task description, and selection of non-governmental members through an eligibility committee was replaced by a general requirement of open, merit-based selection. The requirements that non-governmental actors make up at least half of the members, that the government discuss reports within two months and justify rejections, and that minutes be published were retained.

The Task Force was created by the same 2022 law[15] as the Integrity Authority. Of its 21 members, ten represent state bodies and ten represent civil society, with the president of the Integrity Authority in the chair. Civil members were selected through an open call and served without pay, in their free time, and without the possibility of substitution. The body was given a purely analytical and advisory role: it cannot deal with individual cases, its proposals are not binding, and the government is only obliged to discuss its annual report and explain why it rejects a proposal, with no effective way to

[13] Commission Decision (EU) 2026/1701 of 10 July 2026 confirming the participation of Hungary in the enhanced cooperation on the establishment of the European Public Prosecutor's Office, OJ L, 2026/1701, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_20260170

[14] Proposal for a COUNCIL IMPLEMENTING DECISION pursuant to Article 7(2) of Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget, concerning a written notification from Hungary with regard to Council Implementing Decision (EU) 2022/2506 of 15 December 2022 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=comnat:COM_2026_0516_FIN

[15] Act XXVII of 2022 on the control of the use of European Union budget funds (2022. évi XXVII. törvény az európai uniós költségvetési források felhasználásának ellenőrzéséről; Eufetv.), https://njt.jog.gov.hu/jogszabaly/2022-27-00-00.10

enforce implementation of accepted ones. From the outset, however, the capacity and data needed to prepare the reports sat on the state side, in the ministries, and on one occasion, a government-friendly research institute was commissioned to prepare background studies of which civil members could see only a summary.

In this respect the Omnibus Act[16] brought mainly technical changes: civil society members wil receive an honorarium and may authorize another civil member to represent them, the annual report deadline moved from 15 March to 30 April, a EUTAF representative became a permanent invitee, and civil mandates end after five years, meaning those appointed in 2022 expire at the end of 2027.

The amendments did not address the reasons why the Task Force has not fulfilled its role in the first place. Relations between the state and civil sides were tense through the years, mostly because of the hampered access to information on the civil side and the government side's reluctance to adopt a stronger stance on high-level corruption: not all civil members supported the first report; in 2024, Átlátszó, K-Monitor, and Transparency International Hungary issued a separate report;[17] and in 2025, neither the state nor the civil draft was adopted. The Integrity Authority responded by switching to single-topic reports prepared by its own staff; the first, adopted in March 2026, dealt with anti-corruption education, prompting one civil member to resign and another to call the choice of topic an evasion.[18] The Lifting proposal summarizes this period as internal reforms that strengthened the Task Force. The body still cannot examine individual cases, its proposals are not binding, and thematic reports risk crowding out the most sensitive issues, although the choice of whistleblower protection for next year is a positive sign.

Introduction of a special procedure for priority offences related to the exercise of public authority or the management of public property ("judicial review")

The new measure **C8.R4** (Introduction of a special procedure for priority offenses related to the exercise of public authority or the management of public property) – judicial review measure replaces Reform **C9.R3** (**milestones 169–170**), however the number of measures has been reduced to just one (**milestone 58**). The milestone defines the core design of the procedure. Any natural or legal person, except public authorities, may file a motion for review, and the Integrity Authority may file both a motion and a repeated motion. Where proceedings are terminated again after a successful motion, the petitioner may file an indictment directly with the court, which decides on the merits after examining the evidence. The preliminary examination of such an indictment must be limited, for example, to whether the person named can reasonably be suspected of the offense and whether they enjoy immunity, so that it does not amount to a substantive screening that would prejudge or preclude a decision on the merits. The revision of the RRP also added requirements responding to the Commission's earlier objections: where the investigating judge overturns a dismissal or termination, the prosecution must continue on the basis of the court's reasoning, and the procedure explicitly applies to non-time-barred offenses committed before 2023. At the same time, two elements of **milestone 169** were not carried over: the bar on the Prosecutor General lodging an extraordinary

[16] Act XVIII of 2026 on the amendment of certain acts necessary for access to European Union funds (2026. évi XVIII. törvény az európai uniós forrásokhoz való hozzáférés érdekében szükséges egyes törvények módosításáról; Omnibus Act), promulgated on 26 June 2026, https://njt.jog.gov.hu/jogszabaly/2026-18-00-00.0

[17] K-Monitor and Transparency International Hungary, A korrupció elleni küzdelem aktuális kérdései Magyarországon – különjelentés a Korrupcióellenes Munkacsoport 2023. évi jelentéséhez [Current issues in the fight against corruption in Hungary – separate report to the Anti-Corruption Task Force's 2023 report], March 2024, https://kemcs.hu/wp-content/uploads/2024/03/Kulonjelentes_a_KEMCS_2023-as_Jelentesehez_final.pdf

[18] Átlátszó, „Idén lett éves jelentése a Korrupcióellenes Munkacsoportnak, de újabb tag mondott le" [The Anti-Corruption Task Force has an annual report this year, but another member has resigned], 23 March 2026, https://atlatszo.hu/kozugy/2026/03/23/iden-lett-eves-jelentese-a-korrupcioellenes-munkacsoportnak-de-ujabb-tag-mondott-le/

remedy with the Kúria against decisions taken in the procedure and the allocation of at least two additional judges and two legal secretaries to the Buda Central District Court (BKKB). The new RRP abandoned **milestone 170**, which required the government to review the functioning of the procedure by Q4 2023 and indicate whether legislative changes were needed. The review was completed only in summer 2026,[19] and K-Monitor obtained it through a freedom of information request.

The procedure entered into force in January 2023[20], after expedited clearance by the Constitutional Court. In summer 2026 the Omnibus Act[21] amended the Criminal Procedure Act, which implemented the new requirements: the prosecution must follow the court's guidance and report to the court every two months, and the admissibility of an indictment is now examined by the BKKB rather than the trial court. The amendment explicitly states that it applies for crimes committed before 2023.

Overall, however, in light of the experience of recent years, it remains doubtful whether these changes will improve on the limited results achieved so far. According to K-Monitor's information of December 2025, no case had reached the indictment stage, and motions mostly concerned individual grievances rather than the integrity of public life.[22] Based on monitoring several hundred decisions and its own test motions, K-Monitor identifies continuing obstacles: the prosecution's unchanged discretion in classifying and protracting investigations; the merging of cases, which deprives complainants of their procedural position; access to the case file only just before the indictment, combined with a two-month deadline to file it; less detailed reasoning when the prosecution continues a case on its own decision; the heavy caseload of the BKKB's investigating judges; and the fact that the Integrity Authority has a right of appeal while citizen petitioners do not. The creation of the NVVH does not change this, as it exercises prosecutorial powers under the same procedural rules. K-Monitor submitted these concerns and its proposals to the Ministry of Justice in September 2026.

Amendment of the rules on asset declarations

Milestones 59, **60**, and **61** under **Measure C8.R5** (Amendment of the rules on asset declarations) have been complied with, and the reforms agreed with the Commission have finally been implemented in full. The measure replaces **Reform C9.R4** (**milestones 171–173**) largely unchanged in scope: declarations by senior political officials, MPs, and their household members on entry, annually, and on exit, covering income, real estate, valuable movables, savings, securities, private equity funds, life insurance, trust assets, and beneficial ownership. The revision obviously dropped the original 31 January 2023 deadline for first declarations and made the sanctions regime more specific: whereas Milestone 173 tied sanctions for serious violations to an action of the National Anti-Corruption Strategy, Milestone 61 itself prescribes criminal sanctions for culpable failure to declare or concealment, administrative fines for non-intentional shortcomings, and consequences for the mandate initiated by the Integrity Authority.

[19] Ministry of Justice, review report on the functioning of the special procedure under Chapter CV/A of the Criminal Procedure Act (judicial review), 2026, obtained by K-Monitor through a freedom of information request, https://drive.google.com/file/d/11r0225Nxk7fO-PeNmo-DpUHzzjxQE9_I/view

[20] K-Monitor, „Antikorrupciós büntetőeljárási reform" [Anti-corruption criminal procedure reform], 15 December 2023, https://k.blog.hu/2023/12/15/antikorrupcios_buntetoeljarasi_reform

[21] Act XVIII of 2026 on the amendment of certain acts necessary for access to European Union funds (2026. évi XVIII. törvény az európai uniós forrásokhoz való hozzáférés érdekében szükséges egyes törvények módosításáról; Omnibus Act), promulgated on 26 June 2026, https://njt.jog.gov.hu/jogszabaly/2026-18-00-00.0

[22] K-Monitor, „A korrupció áldozatai és a civil fellépés büntetőjogi lehetőségei" [Victims of corruption and the criminal law options for civil action], 31 July 2026, https://k.blog.hu/2026/07/31/a_korrupcio_aldozatai_es_a_civil_fellepes_buntetojogi_lehetosegei

The Omnibus Act[23] of 2026 amended the relevant Acts and now requires the disclosure of exact amounts instead of income brackets, more information on financial assets, the inclusion of properties in exclusive use and their value, and the disclosure of other interests that may affect the performance of duties. Declarations of MPs and senior political officials are submitted in a new digital system with a public, searchable, and downloadable database, which is operational and—as of 14th October—contains 7 asset declarations.[24] Sanctions range from fines for incorrect completion to loss of office and criminal complaints for deliberate concealment. Together with Milestone 55, the Integrity Authority has gained genuine powers to verify the declarations of nearly 100,000 officials, including local councillors and mayors.

This marks a clear break with the period before 2026. In summer 2022, Parliament hollowed out the asset declaration system; under EU pressure, it largely restored the earlier rules in autumn 2022, but none of the original milestones was met on time. The above-mentioned electronic system and public database and effective sanctions were delivered with multi-year delay only in 2026. Before 2026, no institution checked declarations proactively, methodically, and ex officio. The Integrity Authority's new mandate is not limited to MPs and senior political officials but extends to office holders exposed to high corruption risk across the state, including the President of the Republic, judges, prosecutors, the leadership of the central bank and independent regulators, and mayors and local councillors.

However, some gaps in the implementation remain: the Integrity Authority does not have the staff to check the volume of declarations, declarations made before the cut-off date set in the law will not be imported into the new database, and declarations under the Local Government Act and the Asset Declarations Act are still not recorded in a unified electronic system, which would be a precondition for effective checks.

Whether the reform succeeds will therefore depend less on the legal framework than on whether the IA is given the staff and data access needed to verify such a large number of declarations. Ultimately, it is the practice of the coming years that will decide whether the new system lives up to its promise.

Entry into force of legislation on the transparency of the use of public funds by public interest trust foundations performing public tasks

Measure C8.R6 (Entry into force of legislation on the transparency of the use of public funds by public interest trust foundations performing public tasks, hereinafter referred to as KEKVAs) and relevant **milestone 62** replaces **Reform C9.R5** (**milestone 174**) of the original RRP. The new milestone retains the contracting-authority and access-to-information requirements and adds a legal basis and obligation to phase out KEKVAs that do not maintain a university.

The legislation adopted in autumn 2022 to meet Milestone 174 made the KEKVAs apply the Public Procurement Act but handled conflicts of interest only formally and left politicians on the boards for life; since all founder's rights had passed to the boards, new members could also be chosen by appointees of the Orbán government. Under the Council's December 2022 decision, the KEKVAs were therefore barred from any programme managed directly or indirectly by the EU, including Erasmus+, Horizon Europe and the RRF. In early 2023, several senior political officials "voluntarily"[25] left KEKVA boards at the government's request, without any legal guarantee. A 2024 law extended

[23] Act XVIII of 2026 on the amendment of certain acts necessary for access to European Union funds (2026. évi XVIII. törvény az európai uniós forrásokhoz való hozzáférés érdekében szükséges egyes törvények módosításáról; Omnibus Act), promulgated on 26 June 2026, https://njt.jog.gov.hu/jogszabaly/2026-18-00-00.0

[24] https://vagyonnyilatkozat-pub.parlament.hu/kereses?q=2026

[25] 24.hu, Government press briefing of 9 February 2023 (Kormányinfó, Gergely Gulyás), 9 February 2023, https://24.hu/belfold/2023/02/09/kormanyinfo-gulyas-gergely-bejelentes-nyugdij-arsapka-inflacio-gazdasag-sajtotajekoztato-torokorszag-foldrenges/

asset declaration obligations to board members and would have barred some political office holders but left the transfer of founder's rights unresolved and was made conditional on the lifting of EU restrictions, so it never entered into force;[26] at the end of 2024 the Commission also rejected the government's attempt to have the restrictions on direct EU programmes lifted.[27]

The 2026 legislation meets each element of Milestone 62. KEKVAs and their entities remain contracting authorities and are now also required to publish their spending data in the central register (see **C8.R7** below). For the higher-education KEKVAs, new rules apply to board members (until their dissolution): boards are selected by open call, mandates are limited to 4+4 years, conflict-of-interest and cooling-off rules apply, and appointments are subject to review by the State Audit Office. The government, however, went well beyond the phase-out required by the milestone. Using its two-thirds majority, it abolished this form of foundation altogether through the 16th Amendment[28] to the Fundamental Law of 16 June 2026, with assets and tasks reverting to the state. According to the Omnibus Act,[29] KEKVAs not maintaining universities were dissolved without legal successor on 31 August 2026. KEKVAs in which the state was only a joining party, such as the Batthyány Lajos Foundation, MCC and KEKTK could have continued as ordinary foundations (obviously without state-provided assets and further state contributions), but none applied to do so, and they were dissolved– some legal disputes may still arise though.[30] The higher-education KEKVAs are to be dissolved by 1 August 2027 under a law yet to be adopted.

Some issues remain still open. No comprehensive legislation, including Government Resolution 1226/2026 (VII.14.)[31], settles the fate of the data generated by the dissolved foundations, so it is unclear which body is responsible for their public interest data, which may reduce the transparency of state asset recovery. The final regulations on the dissolution of the higher-education KEKVAs are also undetermined.

Increased transparency of public spending

Measure C8.R7 (Increased transparency of public spending) replaces **Reform C9.R6** (**milestones 175–176**), with reducing the two milestones to only just one (**milestone 63**). The reform concerns the establishment of a publicly available government spending database. The revision of the RPP made the scope of the spending disclosure obligation more explicit: whereas former milestones referred to all public bodies, the new one names budgetary legal persons, state-owned companies and the foundations they establish, state-created trust foundations, KEKVAs and their entities, and the HUN-

[26] Act LIII of 2024 (2024. évi LIII. törvény) amending the rules on public interest trust foundations, https://njt.jog.gov.hu/jogszabaly/2024-53-00-00

[27] European Commission, Decision on Hungary's notification concerning public interest trusts under the Conditionality Regulation, 16 December 2024, https://commission.europa.eu/document/download/8003e1ad-8e79-4238-bf76-af1fcd2b5efe_en?filename=20241216%20Decision%20on%20PITs%20notification%20-%20EN.pdf

[28] Sixteenth Amendment to the Fundamental Law of Hungary (Magyarország Alaptörvényének tizenhatodik módosítása), 16 June 2026, https://njt.jog.gov.hu/jogszabaly/2026-16-04-00

[29] Act XVIII of 2026 on the amendment of certain acts necessary for access to European Union funds (2026. évi XVIII. törvény az európai uniós forrásokhoz való hozzáférés érdekében szükséges egyes törvények módosításáról; Omnibus Act), promulgated on 26 June 2026, https://njt.jog.gov.hu/jogszabaly/2026-18-00-00.0

[30] 24.hu (Rugli Tamás), „Áder a Kék Bolygó Alapítvány megszűnéséről: »A magyar igazságszolgáltatás még útját állhatja ennek a politikai ámokfutásnak«" [Áder on the dissolution of the Kék Bolygó Foundation: "The Hungarian judiciary may still stand in the way of this political rampage"], 28 August 2026, https://24.hu/belfold/2026/08/28/ader-janos-kek-bolygo-alapitvany-magyar-peter-birosag/

[31] Government Resolution 1226/2026 (VII. 14.) on measures related to the dissolution of public interest trust foundations performing public tasks that do not carry out higher-education activities as a public task, and of a public interest trust foundation (1226/2026. (VII. 14.) Korm. határozat a közfeladatként felsőoktatási tevékenységet nem ellátó közfeladatot ellátó közérdekű vagyonkezelő alapítványok, valamint közérdekű vagyonkezelő alapítvány megszüntetésével kapcsolatos intézkedésekről), https://njt.jog.gov.hu/jogszabaly/2026-1226-30-22

REN research network. The milestone lists in detail the data to be published, including the form and legal basis of the expenditure, the name and unique identifier of the beneficiary, the value of the expenditure, the details of the contract and of the tender procedure, including the number of bids and the names of bidders, the names of subcontractors and suppliers and their planned share, the responsible public body, the date of disbursement, and whether the expenditure includes EU support. Data must be accessible free of charge and without registration and updated at least every two months. It also added a requirement to supervise compliance. The former **milestone 176**, which required the register to be fully operational with the complete data set uploaded, was dropped, so the new RRP no longer contains a milestone verifying the register in operation. Under the original RRP, the register was to be in place by Q4 2022 and fully operational by Q1 2023. The first data submission was due only in February 2023, but the scope of bodies and data were too narrow,[32] leaving out state-owned companies and KEKVAs, and minor amendments in early 2025 did not overcome serious technical obstacles to searching and downloading data. [33]

The Omnibus Act extended the obligation to publish in the Central Information Public Data Register (KIF) according to the new milestone, widened the data to be published, and requires open, interoperable, machine-readable, and bulk-downloadable formats. Where a body fails to publish, or publishes incomplete or false data, the National Authority for Data Protection and Freedom of Information may launch proceedings and impose a fine of between HUF 100,000 and HUF 50 million. The upgraded platform was completed on 31 August, and the full database can now be downloaded in .csv format.[34]

It is by no coincidence that the new RRP dropped the requirement of system operation verification, as only weeks passed between the new rules, the technical development, and the assessment. The register still relies on self-reporting in Excel templates, and the National Authority for Data Protection and Freedom of Information typically examines completeness only upon complaint. Submissions are not standardized, the same organizations appear under several names, and duplicate submissions are still common. Contracts below HUF 5 million, the contracts themselves, and beneficial ownership data are not included; the latter can be accessed by journalists and NGOs only through a separate register, so linking the two still requires manual work.

Transparency of beneficial owners

The reform (**C8.R3**) was added to the RRP by the amendment proposed on 5 August 2026, it has no predecessor in the original RRP. It has two legislative components:[35] (i) a revised definition of the ultimate beneficial owner (UBO), with special provisions on private investment funds, so that bodies managing and controlling EU support can gather and verify data on the UBOs of private equity funds from at least 1 February 2020; (ii) a clarified and extended scope of excluded public officials, and of entities that cannot apply for or receive subsidies from public funds.

The disclosure of information on beneficial owners – that is, natural persons holding at least a 25 per cent stake in companies and other organisations or possessing voting or control rights – is required

[32] See e.g. K-Monitor, „Újabb hatalmas lyukat találtunk az EU-s nyomásra létrehozott állami közpénzes adatbázison" [We found another huge gap in the state public spending database created under EU pressure], 30 October 2023, https://k.blog.hu/2023/10/30/ujabb_hatalmas_lyukat_talaltunk_az_eu-s_nyomasra_letrehozott_allami_kozpenzes_adatbazison

[33] K-Monitor, „A rough winding road leads to public data on the new portal promised to the EU", 6 June 2023, https://k.blog.hu/2023/06/06/a_rough_winding_road_leads_to_public_data_on_the_new_portal_promised_to_the_eu

[34] https://kif.gov.hu/

[35] Proposal for a Council Implementation Decision amending the Implementing Decision of 15 December 2022 on the approval of the assessment of the recovery and resilience plan for Hungary, 2026/0236 (https://eur-lex.europa.eu/legal-content/HU/TXT/HTML/?uri=CELEX:52026PC0432&qid=1790083351321)

by EU anti-money laundering rules in all Member States. In Hungary, this information has been recorded in the Tax and Customs Authority's (hereinafter: NAV) database since 2021.[36] However, data relating to private equity funds was subsequently removed from this database.[37] As Transparency International (TI) Hungary previously revealed,[38] this omission contravenes EU rules; consequently, following our report, infringement proceedings were initiated against Hungary in this matter.[39] Subsequently, under the previous government, the National Assembly amended the rules on the beneficial owners of private equity funds so that data on investors would only be required to be published following this year's parliamentary elections in 2026.[40] These rules were further tightened by the new parliament following the elections, by specifying the circumstances under which a natural person may be regarded as the beneficial owner of private equity funds in the Act of XVIII of 2026 on the amendment of certain laws necessary to ensure access to European Union funds. The rules apply after 29 June 2026.

The Act introduced the following amendments related to **reform C8.R8** :

- For closed-end funds, the UBO is the natural person who, under the fund rules, can exercise decisive influence over the investment policy, or who holds enough votes to amend the fund rules or transfer the management mandate. The general definition now also covers holders of preference shares with voting or appointment rights and persons entitled to at least 25% of distributions.[41] These amendments provided a much more detailed means of identifying all owners.
- Fund managers must report each fund's UBO data directly to the register (NAV), going back to 1 February 2020 or to the fund's creation, by 5 October 2026.[42] Bodies controlling EU funds have access to the register, and the Integrity Authority has a direct data connection.[43] This covers the first component. Particular mention was made of the legitimate interest of the press and the civil society sector in accessing information on beneficial ownership, which had been a long-standing shortcoming.
- The definitions of excluded and non-excluded public officials were rewritten, and a new "responsible person" (executive officer) was defined.[44] Companies, cooperatives and associations whose responsible persons fall into the excluded categories, with a two-year look-back, cannot apply for support, and applicants must declare such links. This covers the second component.
- Bidders whose beneficial owner cannot be identified are excluded as non-transparent economic operators.[45]

The amendments look good on paper for the time being, they are not yet working in practice. Transparency International Hungary queried the NAV register on 11 September 2026 for 45 private equity funds not fully state-owned, which hold HUF 1,536 billion in state investment commitments,

[36] https://nyl.nav.gov.hu/home

[37] https://www.direkt36.hu/en/toroltek-az-oriasi-vagyonokat-rejto-magantokealapok-gazdait-az-allami-adatbazisbol-miutan-a-direkt36-cikket-irt-roluk/

[38] https://transparency.hu/wp-content/uploads/2024/09/private_equity_funds_web-1.pdf

[39] European Commission: July infringement package: key decisions (https://ec.europa.eu/commission/presscorner/detail/hu/inf_24_3228)

[40] Act LVI of 2024 on the amendment of certain laws relating to finance and asset management

[41] Amendments of Act LIII of 2017 on the prevention and combating of money laundering and the financing of terrorism (hereinafter: AML Act)

[42] Act XLIII of 2021 on Act XLIII of 2021 on the establishment and operation of the data reporting framework relating to the identification obligations of financial and other service providers (hereinafter: Afad tv.), § 26/C (2), inserted by § 146 of Act XVIII

[43] Afad tv. 8. §. (2a) – (2b).

[44] Act CLXXXI of 2007 on the transparency of grants awarded from public funds (hereinafer: Knyt.), 2.§ (1) d), e), h).

[45] Act CXLIII of 2015 on Public Procurement (hereinafter PP Act). 3. § 10a., 62. § (1) k) kb)

and their 26 fund managers.[46] According to the results, a quarter of the requested funds and almost a third of the management companies were missing from the register. Nearly two-thirds of the funds were registered using UBO categories for companies or trusts rather than those for closed-end funds. Several entries cite provisions repealed at the end of June.

Without registry-side verification, the data cannot yet be relied on by the Integrity Authority, contracting authorities or the public. Act XVIII declares that it complies with Article 10 of the AML Directive (EU) 2024/1640, which requires registry bodies to verify that UBO data are adequate, accurate and up to date. However, NAV still does not check the data and places responsibility on the reporting institutions. The transposition deadline is 10 July 2027.

Procurement-related reforms

Reducing the share of single-bid procedures

The **reform** (**C8.R9**) requires the share of single-bid procedures in at least partly EU-funded procurement to stay below 15%, measured with the dedicated reporting tool under the Single Market Scoreboard methodology.[47] The 2022 plan also contained targets for nationally funded procurement (32% by Q1 2023, 24% by Q1 2024). National targets no longer appear in the amended plan.[48] A count-based indicator limited to EU-funded procedures is the easiest metric to meet.

According to EPS (electronic public procurement system) count-based data cited in the 2026 action-plan review, the EU-funded single-bid share was 13.3% in 2022, 5.5% in 2023, 4.2% in 2024 and 9.5% in 2025. This is still below the threshold, but more than double the previous year's rate. The nationally funded share fell to 22.3% in 2024 and stagnated at 22.0% in 2025 which haven't achieved the target set in the previous RRF goals.[49]

Market-wide, the Scoreboard shows 24% single bids for 2025 (EU average 27%), while the value share of single-bid procurement under national rules or from national funds increased.[50] In Q1 2026 the count-based single-bid share in the EU procedural regime was unchanged year on year, but the value share rose to 28.7% (+8.3 pp).[51] The Government reports that the overall share fell from 22.1% (January–12 May 2026) to 17.4% (13 May–10 September), and for framework agreements from 44.4% to 27%.[52]

However, reducing the number of single-bid tenders is not a clear-cut solution for promoting fair competition in the Hungarian public procurement market, for several reasons. Not only can this indicator be manipulated using sham bids, but it also allows a significant methodological loophole to be exploited. Crucially, the European Commission's Single Market Scoreboard excludes framework agreements from the single-bid calculation. Yet framework agreements account for a large and

[46] https://transparency.hu/hirek/magantokealapok-adatbazis-hibas-adatszolok/

[47] European Commission: Single Market Scoreboard on Public Procurement (https://single-market-scoreboard.ec.europa.eu/business-framework-conditions/public-procurement_en)

[48] Proposal for a Council Implementation Decision amending the Implementing Decision of 15 December 2022 on the approval of the assessment of the recovery and resilience plan for Hungary, 2026/0236 (https://eur-lex.europa.eu/legal-content/HU/TXT/HTML/?uri=CELEX:52026PC0432&qid=1790083351321)

[49] National Development Centre: Analysis of trends in single-tender public procurement (https://ekr.gov.hu/cms/szakmai-anyagok/632022-ii-28-korm-rendelet-anyagai/elemzes-az-egyajanlatos-kozbeszerzesek-alakulasarol/elemzes-az-egyajanlatos-kozbeszerzesek-alakulasarol-2026-02-13)

[50] European Commission, 2026 Rule of Law Report – Country Chapter on Hungary (https://commission.europa.eu/document/download/0e737e3a-55fd-424e-883d-72c2d3092be1_en?filename=Country%20chapter%20-%20Hungary%20-%20EN.pdf)

[51] Public Procurement Authority: Report on Q1-Q2, 2026 (https://kozbeszerzes.hu/media/documents/gyorsjelentes-2026-i-felev.pdf)

[52] https://kormany.hu/egyajanlatos-kozbeszerzesek

growing share of Hungarian procurement spending: close to 60% of total contract value in 2025. Furthermore, nearly three-quarters (74%) of framework agreements were awarded without reopening competition among multiple suppliers in Hungary.[53] The use of framework agreements is particularly widespread among so-called central purchasing bodies, which, moreover, store numerous details of the contracts solely in their own, non-public systems. In other words, the headline single-bid figures most often cited exclude the very contracting method in which lack of competition is, on the regulator's own evidence, most concentrated.

Integrity, transparency and competition in the procurement

This new **measure** (**C8.R10**) and relevant **milestone** (**67**) requires the entry into force of rules on (i) transparency of procedures, (ii) corruption prevention and conflicts of interest, (iii) reporting and publication obligations and (iv) incentives for competition. Act XVIII of 2026 introduced the following changes to the Act on Public Procurement (hereinafter PP Act.), in force from 29 June 2026:

- Transparent economic operator: A new definition[54] qualifies an economic operator as transparent if its beneficial owner under the Act on Money Laundering (hereinafter AML Act) can be identified by the contracting authority and it discloses its ownership and control structure. Non-transparent operators are excluded, as are operators in which a non-transparent entity holds more than 25% directly or indirectly.[55] During evaluation, contracting authorities may request further information at any time to identify the natural person exercising control.[56] Throughout performance, the contractor must keep its ownership structure knowable and, on request, identify the controlling persons of entities.[57]

- Conflict of interest: The presumption of conflict of interest now expressly extends to the beneficial owner (under the AML Act) of a bidder, candidate, subcontractor or capacity-providing entity, alongside its members, executives, supervisory board members, employees and their relatives.[58] The bar on participation by bidder organisations owned by top officials or their relatives was also amended.[59] It covers, among others, the President of the Republic, the Speaker and deputy speakers, members of the Government and the heads of the Kúria, the Prosecution Service, the State Audit Office, the regulators and the National Bank. However, it still does not extend to Members of Parliament or mayors.

- Anti-corruption conditions: The new 132. § (4) of PP Act lists anti-corruption conditions that may be attached to contract performance: rules on transparent operation and avoiding conflicts of interest, corruption-risk assessment and mitigation, codes of conduct, training, subcontractor transparency, reporting channels for abuses, monitoring mechanisms, a designated responsible person and regular reporting. Under 132. § (5) of the PP Act, such conditions may be set only in proportion to the risks and to the extent necessary, so their use is optional. In addition, every contractor is now bound by a statutory duty to cooperate in reducing the risk of corruption offences, breach of trust, budget fraud and bid rigging.[60]

[53] Integrity Authority, 2025 Annual Analytical Integrity Report, 30 June 2026, Sections 2.1 and 2.10 (framework-agreement analysis) (https://integritashatosag.hu/wp-content/uploads/2026/06/Eves-elemzo-integritasjelentes-20250630.pdf)
[54] PP Act 3. § 10a.
[55] PP Act 62. § (1) k) kb)–kc).
[56] PP Act 69. § (15)
[57] PP Act 136. § (1) b)
[58] PP Act 25. § (5) b)–c)
[59] PP Act 25. § (6)
[60] PP Act 136. § (1) c)

- Other transparency and oversight provisions: procurement documents must be available free of charge on the EKR's public interface without registration.[61] For concessions, the results of market research and consultation and the risk assessment must be published.[62] The Integrity Authority may now have the Arbitration Board suspend a procedure and may sue the Board for failure to act.[63] The register of excluded economic operators has been launched in EKR, with more than 500 registration procedures expected.[64]

These amendments address long-standing gaps, especially beneficial ownership, and the European Commission counts them among Hungary's new remedial measures. Their effect depends on use in practice: anti-corruption clauses are discretionary, and verifying beneficial ownership relies largely on contracting authorities' discretionary requests.

EPS development for transparency

The measure (C8.R11) covers the development of the Electronic Public Procurement System (EPS) to increase transparency. The functions of EPS should allow the structured search in contract award notice data and bulk export of contract award notice data published in the EPS in a machine-readable format. Economic operators in the database, including members of consortia, should be identifiable by a unique identifier (e.g. tax number). The database should be updated regularly, and it is freely accessible and downloadable by anyone from the EPS website without registration.

Structured search and bulk export (in CSV/Excel format) of contract award notice data have been available since 30 September 2022.[65] They were later extended to subcontractors and to notices published since 1 January 2014. In 2025, indicators of the performance measurement framework were refined further, however filtering and download options were restricted and the year-by-year datasets available were difficult to compile, which made the bulk-download interface user-unfriendly for journalists and researcher. This issue has been rectified since, so complete time series can now be queried on the portal.

The disclosure system nonetheless remains fragmented. Data on framework agreements of central purchasing bodies (e.g. Directorate-General for Public Procurement and Supply (KEF), Digital Government Agency (DKÜ), the National Communications Office (NKOH)) are limited in the EPS and difficult to evaluate. Some of these bodies publish data on the individual contracts concluded under their frameworks only in their own systems, outside the EPS, while others publish data for the contract period irregularly.[66] The EPS bulk export therefore does not show which companies receive public resources under framework agreements. The 2026 action-plan (see C.8 R13) review reports only that KEF and DKÜ published data on the distribution of call-off contracts among economic operators for 2024 and 2025. These are distribution data, not contract-level records integrated into the EPS. In June 2026 the Government made the use of centralised communications procurement voluntary and prohibited new orders under existing framework agreements.[67] This closes one opaque channel but leaves the disclosure architecture unchanged.

According to the description of the milestone, an independent audit report confirming the functioning of the EPS platform should prove the fulfilment of the task. However, this report is not

[61] PP Act 39. § (1)
[62] PP Act 120. § (4)
[63] PP Act 152. § (1) o) and 156. § (2a)
[64] https://ekr.gov.hu/nyilvantartasok/hu/integritas
[65] https://ekr.gov.hu/portal/kozbeszerzes/eredmeny-tajekoztato-hirdetmenyek
[66] Integrity Authority, 2025 Annual Analytical Integrity Report, 30 June 2026, p. 113 (https://integritashatosag.hu/wp-content/uploads/2026/06/Eves-elemzo-integritasjelentes-20250630.pdf)
[67] Government Decree No. 95/2026 (18 June)

publicly available, or was not traceable neither on the EPS platform, nor on the website of the EPS service provider, Új Világ Nonprofit Kft.

Performance measurement framework for public procurement

Measure C8.R12 and the relevant **milestone 69** has been formally complied with. It replaces **Reform C9.R12** (**milestones 200–202**) of the original RPP. The original requirement in the reform to involve independently selected NGOs and procurement experts and to publish the results by 28 February each year are not part of the new **milestone 69**. In practice, results have been published annually since 2023 with the involvement of independent experts and NGOs, although the independent experts attached dissenting opinions to the results every year.

In September 2022, the Government adopted Government Resolution 1425/2022. (IX. 5.), which aimed to develop a performance measurement framework (hereinafter: the Framework) to assess the efficiency and cost-effectiveness of public procurement. The performance measurement framework became operational on schedule as published on the EPS website on 30 November 2022 and is run with a working group of independent public procurement experts. Annual analyses have appeared since February 2023 (115 indicators in 2024), and the indicators were refined further in 2025.[68] The Council Implementing Decision found that Hungary had fulfilled its commitments for this remedial measure.

According to opinion of the working group published as an attachment of the analysis on year 2025,[69] in most cases, the failure to award a contract was since at least two tenders or requests to participate were not submitted in the public procurement procedures. Furthermore, the working group highlighted that from the perspective of competition and the proper functioning of the market, it is worth noting – and a cause for concern – that the proportion of framework agreements concluded with a single bidder remained high. This factor is also important to examine when assessing the efficiency of central purchasing bodies. Framework agreements concluded for longer periods, restrict the market and stifle competition.

Action plan to increase competition in public procurement

Milestone 70 under **Measure C8.R13** has been formally complied with. It replaces **Reform C9.R13** (**milestones 203–204**) the requirements to set measurable annual objectives and to base the plan and its revisions on the Integrity Authority's findings were replaced by a general obligation to set objectives and review the plan annually. The action plan (2023–2026) was adopted by Government Resolution 1118/2023 (III. 31.) and reviewed by Resolutions 1082/2024 (III. 28.) and 1086/2025 (III. 31.). The latest review[70] was adopted under the previous Government, before the change of government in May 2026. It states that the plan sets concrete, measurable annual objectives, and that the responsible minister monitors progress regularly.

The 2026 review mainly reports measures already completed (except for DKÜ and NKOH joining the European Network of Central Purchasing Bodies), although in some cases the effectiveness of the measures is highly questionable. The report concluded on PP Act 115. § procedures states that whilst there are identifiable weaknesses in this type of procedure, the figures do not indicate a widespread pattern of abusive application of the law in relation to the use of this type of procedure. Therefore, even though the Integrity Authority has long been recommending the abolition of this practice, which

[68] https://ekr.gov.hu/cms/szakmai-anyagok/teljesitmenymeresi-keretrendszer?page=1
[69] https://ekr.gov.hu/cms/hirek/munkacsoporti-velemeny-es-javaslatok-a-kozbeszerzesek-hatekonysagat-es-koltseghatekonysagat-ertekelo-teljesitmenymeresi-keretrendszerhez-2025
[70] Government Resolution 1106/2026 (III. 23.)

is capable of restricting competition, the report did not propose any changes to the regulatory framework but merely recommended stepping up oversight.

The new tasks are soft. The minister must identify contracting authorities with persistently high single-bid rates and send the list to the State Audit Office and the Government Control Office (by 15 July 2026). Other tasks are to update guidance on market consultation (by 31 December 2026), draft a bidder-training concept (by 31 July 2026), hold a professional forum on standing in remedy procedures (by 30 November 2026), and have the Competition Authority review corruption risks (by 31 December 2026).The plan relies on reports, guidance, training and lists, with no sanctions. It contains no measure to reduce single-bidder framework agreements of central purchasing bodies, a core issue highlighted in the assessment of the Framework working group. The plan's horizon ends in 2026. The most significant 2026 procurement reforms were adopted outside its framework.

Independence of the Judiciary

See below in Chapter 1 of Section II on the assessment of compliance with the horizontal enabling conditions on the effective application and implementation of the Charter of Fundamental Rights.

Reforms related to the sound management of EU Funds

Legislative amendments strengthening the management, monitoring, audit and control mechanisms ensuring the proper use of EU support

The legal requirements of **milestones 75** and **76** under **Measure C8.R18** have been met, but their application in practice has yet to be seen. The measure itself replaces **Reform C9.R19** of the original RRP. The revision dropped one significant safeguard: the regular rotation of staff in sensitive positions, such as those dealing with irregularity management, controls and risk assessment, is no longer required, and **milestone 75** asks only for procedures for their oversight.

The 2026 legislation completed the existing legislative framework. Government Decree 121/2026 amended the implementing decrees for the 2014–2020 cohesion funds (Government Decree 272/2014), the 2021–2027 cohesion funds (Government Decree 256/2021) and the RRF (Government Decree 373/2022) in a uniform way,[71] so that the same rules on conflict-of-interest checks, the use of Arachne+ and the competence of BEII now apply to all three funding channels.[32] A new Section 22/B of Government Decree 373/2022 introduced comprehensive ex-post checks that continue after the end of the implementation period, with agreements, contracts and payments selected on a risk basis and checked against data from asset declarations, the central spending register (see above), the beneficial ownership register and Arachne+, closely following point h) of **milestone 75**. Government Decree 127/2026 (VIII. 25.)[72]. The amendments also set out how procurement procedures that were not originally EU-funded but were later brought under EU funding are to be checked ex post. These rules were adopted only weeks before the August 31 deadline and the government's notification on the completion of the commitments in the conditionality framework.

The regular verification of conflict-of-interest declarations required by **milestone 75** is carried out by the Directorate of Internal Audit and Integrity (DIAI) through a dual approach: spot checks targeting specific risk groups and checks based on whistleblower reports. However, a critical operational failure

[71] 121/2026. (VIII. 7.) Korm. rendelet egyes fejlesztéspolitikai tárgyú kormányrendeletek módosításáról. https://njt.jog.gov.hu/jogszabaly/2026-121-20-22

[72] 127/2026. (VIII. 25.) Korm. rendelet a Magyarország Helyreállítási és Ellenállóképességi Terve végrehajtásának alapvető szabályairól és felelős intézményeiről szóló 373/2022. (IX. 30.) Korm. rendelet módosításáról https://njt.jog.gov.hu/jogszabaly/2026-121-20-22.0#ME2

concerns the conflict-of-interest reporting interface[73]. Experience indicates that this channel is highly ineffective: for years it has received an extremely low number of reports,[74] and a significant proportion of those submitted are irrelevant or misdirected, concerning issues outside DIAI's competence. This underutilisation suggests that the interface is either not sufficiently visible, poorly designed or lacks the necessary user guidance, effectively preventing it from serving as a functional early-warning mechanism for detecting irregularities.

It should be noted here that some elements of the actual implementation of the milestone is difficult to verify by civil society stakeholders, since the milestone refers to a number of methodologies and procedures that, although included in Hungary's notification and its annexes referred to in the Commission's Lifting proposal, have not been made public.[75]

Anti-fraud and anti-corruption strategy for the implementation, audit and control of EU support

Technically, **milestone 77** under **Measure C8.R19** (Anti-fraud and anti-corruption strategy for the implementation, audit and control of EU support) has been complied with. It replaces **Reform C9.R20**, merging the strategy and the action plan, previously separate **milestones** (**220 and 221**), into a single milestone with unchanged content. Hungary adopted the strategy in 2022, after the agreed deadline, reviewed it in 2024 and extended it to agricultural subsidies.[76] [77] To our knowledge, the strategy has not been updated ever since, even though the first measure of the action plan attached to the 2024 strategy was precisely its revision in 2025. No further update of the action plan was prepared in 2025 or 2026 either, although its deadlines have since expired. Also, the latest publicly available report on the implementation of the strategy dates back to 2023.

Arachne system for EU support

Under the 2022 conditionality procedure, Hungary undertook to upload the data of all EU support and programming periods to Arachne on a regular basis, and to ensure that managing, control and audit authorities make meaningful use of its risk alerts. **Reform C9.R21** in the original RRP required the systematic use of Arachne for all Union support, including the 2014–2020 period, with complete data uploads every two months, binding follow-up of risk scores, including the ex-ante verification of applicants, and full access for Hungarian and Commission audit and control bodies. Moreover, it required binding procedural guidelines and an unqualified EUTAF audit confirming complete uploads and systematic follow-up. The new RRP retains these obligations in its **Measure C8.R20**, but with a narrower scope: they cover the RRF and the 2021–2027 cohesion funds, while funds under the Common Agricultural Policy were taken out, and for them **milestone 79** requires only an action plan. The reason for this amendment is that—as the Commission's Lifting proposal demonstrates on the basis of Hungary's notification—the full and timely upload of agricultural data had not been achieved, so separate, later deadlines now apply that fall outside the implementation period of the RRP. That

[73] https://osszeferhetetlenseg.palyazat.gov.hu/

[74] See e.g. Government of Hungary, Beszámoló az Európai Unióból származó forrásokra vonatkozó Csalás Elleni Stratégia Cselekvési Tervének 2023. évi megvalósulásáról, valamint a magyar fejlesztéspolitikai intézményrendszer további csalás elleni intézkedéseiről [Report on the implementation in 2023 of the Action Plan of the Anti-Fraud Strategy for EU funds and on further anti-fraud measures of the Hungarian development policy institutional system], available in the document library „Csalás és korrupció elleni stratégia", palyazat.gov.hu.

[75] European Commission, Proposal for a Council Implementing Decision on measures for the protection of the Union budget against breaches of the principles of the rule of law in Hungary, COM(2022) 485 final, 18 September 2022, footnotes 152–153. https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52026PC0516&qid=1790927404613#footnote152

[76] https://njt.jog.gov.hu/jogszabaly/2024-1249-30-22

[77] https://www.palyazat.gov.hu/informacio/dokumentumtar/csalas-es-korrupcio-elleni-strategia-78103

is why the latest version of **milestone 79** also no longer requires EUTAF to confirm that the data have been uploaded "in its entirety"

In other respects, the new government met the necessary legislative requirements. Government Decree 121/2026 introduced Arachne+ and made complete data uploads every two months mandatory across the 2014–2020 and 2021–2027 cohesion funds and the RRF, obliging authorities to carry out further checks in response to risk alerts and to be bound by them in their decisions. In August 2026 EUTAF issued an unqualified audit opinion[78] on the cohesion programmes and the RRF. For agricultural and rural development funds, however, the government itself acknowledged that data had not been uploaded completely, on time or regularly, and Government Resolution 1259/2026 set out an action plan running until the end of 2026[79]. While the RRP had to be modified in order to be able to meet the milestones, the Commission considered that the above-mentioned shortcoming should not be an obstacle to lifting the restrictions.

Establishment of a Directorate of Internal Audit and Integrity to strengthen the control of conflicts of interest in the implementation of EU support

Measure C8.R21 (**Milestone 80**) replaces **Reform C9.R22** (**Milestone 224**). The new milestone requires only the entry into force of legal acts, and several safeguards were modified along the way. In the 2026 Commission Lifting Proposal, the Commission accepted Hungary's account that the DIAI has been continuously carrying out its activities since 2023 and that the investigation methodology was updated in July 2026.[80] The Government Decree 121/2026 also extended DIAI's competence to all bodies involved in the implementation of union support.

Ensuring the capacity of EUTAF/DGAEF to carry out its tasks effectively

The Directorate General for Audit of European Funds (EUTAF/DGAEF) is Hungary's audit authority for EU funds, and its independence was part of the 2022 remedial measure on strengthening audit and control mechanisms. The original RRP set out the capacity requirements of the EUTAF/DGAEF in **Reform C9.R23**. EUTAF/DGAEF's annual budget was to be based on its own initial proposal and modified only with public justification; the remuneration of both its head and its staff was to be set at 70% of that of the President and staff of the State Audit Office; the head was to have powers over salary policy, benefits and working conditions comparable to those of the State Audit Office President, with deviations possible only on a justified written proposal; and EUTAF's functional and professional independence was to be maintained. While the revised measure keeps the budgetary rule and the independence guarantee, the 70% benchmark now applies only to the head of EUTAF. **C8.R22** can be considered complied with, but in a narrower form than originally agreed, as the revision dropped the elements that concern the bulk of EUTAF's workforce. With this caveat in mind, the EUTAF has confirmed in a letter to the Commission that the organisation's budget and staffing are sufficient for independent operation.[81]

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[78] According to the Lifting Proposal the scope of EUTAF Reports on the ARACHNE covers the following programmes and instruments: DIMOP Plus, EFOP Plus, GINOP Plus, IKOP Plus, KEHOP Plus, MAHOP Plus, TOP Plus, VOP Plus, BBA Plus, HAVE Plus, MMIA Plus, Recovery and Resilience Facility.

[79] Government Resolution 1259/2026 (VIII. 14.) on the mandatory use of the ARACHNE+ risk-scoring tool (1259/2026. (VIII. 14.) Korm. határozat az ARACHNE+ kockázatértékelő eszköz kötelező alkalmazásáról), https://njt.jog.gov.hu/jogszabaly/2026-1259-30-22

[80] European Commission, Proposal for a Council Implementing Decision on measures for the protection of the Union budget against breaches of the principles of the rule of law in Hungary, COM(2022) 485 final, 18 September 2022, footnote 144. https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52026PC0516&qid=1790927404613#footnote144

[81] European Commission, Proposal for a Council Implementing Decision on measures for the protection of the Union budget against breaches of the principles of the rule of law in Hungary, COM(2022) 485 final, 18 September 2022, footnote 147. https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52026PC0516&qid=1790927404613#footnote147

Cooperation with OLAF to strengthen the detection of fraud related to the implementation of EU support

Measure C8.R23 and the relevant **milestone 82** has been complied with. It replaces **Reform C9.R24** (**milestone 226**) without substantive change: the National Tax and Customs Administration is designated to assist OLAF's on-the-spot checks, and a dissuasive financial sanction applies to economic operators refusing to cooperate. Both have been in place since 2022. In practice, OLAF on-the-spot checks are rare, and it is unclear how many sanctions have been imposed. Accession to the EPPO (**milestone 56**) is expected to enable stricter action against offences affecting EU funds.

Audit and control of the Recovery and Resilience Plan and the protection of the financial interests of the Union

According to **milestone 83** under **Measure C8.R24** an unqualified EUTAF audit report must confirm that the repository system collects data on and monitors the achievement of the RRP milestones and targets, and that it collects, stores and gives access to the data required by Article 22(2)(d) of the RRF Regulation. According to the revised Audit Strategy an initial audit was carried out in 2023, and a newer one is set to be performed before the 30th of September 2026. [82] These reports are not publicly available.

Milestone 84 requires EUTAF to adopt an audit strategy in line with internationally accepted standards, setting out its risk-assessment methodology, the frequency and type of audits, such as system and project audits and desk-based and on-the-spot checks, and the reliability of the data supporting milestones and targets. As a new element, the milestone also adds that the strategy must cover the RRP at least until the end of 2028, that the audits must involve a high degree of substantive testing, and that they must sufficiently cover whether implementing bodies carry out the comprehensive ex-post controls required by point (h) of **milestone 75**. Government Decree 121/2026 transposed these requirements into the rules on the audit strategy almost word for word. In August 2026, the EUTAF published its new RRF audit strategy. [83]

Strengthening transparency and access to information of public interest

Milestones 85, **86** and **87** under **Measure C8.R25** replace Reform **C9.R26** (**Milestones 229–233**) with several alterations. **Milestone 85** requires legislation introducing an expedited procedure for freedom of information requests, with procedural steps and deadlines similar to press rectification cases, and obliging both data controllers and – as a new element – requestors to act in good faith and cooperate to ensure transparency in the use of public funds and assets. The Freedom of Information Act has been amended with Act XL of 2022 by speeding up court proceedings in access to public interest data cases. These rules have not been amended since adoption in 2022.

K-Monitor's research showed the new litigation rules have significantly speeded up access to information. [84] It can take months to close a court case instead of the year and a half it used to take. Speeding up the procedure is principally welcome. First instance courts are very serious about keeping the fast-track deadlines. However, the fast-track rules can in many cases be burdensome for

[82] Directorate General for Audit of European Funds (EUTAF), Revised Audit Strategy for the Hungarian Recovery and Resilience Plan with reference to Regulation (EU) 2021/241, in accordance with Article 13(1)(a) of Government Decree No. 373/2022, Version 6, Ref. No. EUTAF-IX/00009/002/2026, approved by Balázs Dencső, Director General, Budapest, August 2026, https://eutaf.hu/wp-content/uploads/2026/08/RRF_audit_strategy_2026.pdf

[83] Ibid.

[84] Report On The Access To Information In The Context of the Measurements Adopted in the Conditionality Procedure Against Hungary, December 2023
https://k.blog.hu/2024/01/16/k-monitor_s_report_on_the_hungarian_freedom_of_information_laws_adopted_in_the_conditionality_proced

the data requester. Under the new rules, it is permitted for the defendant to present its defense orally at the first hearing. In such a situation, the data requester cannot prepare effectively and has to develop their arguments right at the hearing. Adjournment of the hearing in such a case is also only possible in exceptional circumstances. Under the new rules, there is a greater need for preparation and representation by a lawyer, which makes access to justice more costly. First, because of the fast-track procedure, lawyers need to be available on a more flexible basis while the case is running. Second, because of the importance of the first hearing, legal expertise is necessary even in cases which representation is not required by law in. Short deadlines can also be a challenge for courts when hundreds of pages of documents have to be reviewed and assessed properly within the 15-day timeframe. There is no data available on whether court capacities (staff, courtrooms) have been strengthened to cope with the new rules. Time pressure on judges might decrease the quality of justice. A stay of the proceedings cannot be requested even at the joint request of the parties, which precludes the parties from having time to make a settlement. The fact that trade secret holders can be involved in the procedure could be justified, but it brings a number of risks for citizens. The increased number of defendants and the risk of high legal costs may discourage data requesters from turning to court. While there have been examples of corporates intervening in the lawsuit to protect their trade secret, there have been no examples of the National Authority for Data Protection and Freedom of Information (hereafter: Data Protection Authority) acting in support of the data requester fighting for transparency.

Despite significantly speeding up the procedure before ordinary courts, there is still no rule on the time limit for the Constitutional Court (hereafter: CC) to rule on FOI cases upon a constitutional complaint. After a lost FOI case, it can take years for the CC to rule on the case, at a time when the data being sued for lost its significance. Although the new rules were adopted for the interest of the data requester, they failed to address a number of problems that had been clear for years. Similarly, there is no time limit for uniformity complaint proceedings before the Kúria.

With the adoption of the Omnibus Act, good faith and cooperation requirements have been included in the Freedom of Information Act. No case law can be identified as to the interpretation of the new provision.

Milestone 86 requires legislative amendments establishing free access to public information as the general rule, abolishing labour-cost fees and limiting charges for copying and delivery to publicly defined, actual costs exceeding HUF 10,000, subject to an overall ceiling of HUF 190,000. It also requires repealing the grounds for refusing requests because fulfilling them would involve acquiring, collecting or processing data, or creating new data.

The Freedom of Information Act has been amended with Act XXVIII of 2022 to repeal labour-cost fees. The Government Decree No. 301/2016 (IX. 30.) on the costs of fulfilling public information requests was amended accordingly, bringing the applicable fees into line with the amounts specified in the milestone.

The Omnibus Act reacted to a new element of the milestone as it repealed the provision based on which data controllers had invoked the need to produce new data sets as a ground for refusal where the data is otherwise available at a subordinated body.

These amendments can be regarded as an *ad hoc* response to the changes restricting freedom of information introduced in recent years.[85] They do not remedy the grounds for restricting disclosure

[85]Hungarian Government Further Weakens Access to Information, 23 January 2024 https://k.blog.hu/2024/01/23/hungarian_government_further_weakens_access_to_information

that are proliferating in sectoral laws (e.g. foreign policy interests, protection of government decision-making) and further fragmenting the FOI framework,[86] nor the fact that the Parliament has still not complied with CC Decision 7/2020. (V. 13.), so a FOI lawsuit still cannot be brought against entities that use public funds.[87] A problem arising in the past year is that FOI requests involving multiple data can be taken to court in a more limited way than before.[88]

Milestone 87 requires the National Authority for Data Protection and Freedom of Information to conduct proactive and complaint-based checks on public bodies' compliance with transparency and access-to-information requirements, and to publish reports identifying shortcomings, corrective measures and recommendations for improving access to public data.

To demonstrate compliance with **milestone 87**, the Data Protection Authority published a summary report on its website.[89] After presenting some statistical data, the 524-page report serves as a repository of decisions and opinions issued by the Data Protection Authority, without providing any meaningful assessment of them.

Improving the quality of law-making and effective involvement of stakeholders and social partners in decision-making

RRF Monitoring Committee

Milestone 88 under **Measure C8.R26** retains the RRP Monitoring Committee requirements established under **Reform C9.R27** of the previous RRP. At least half of the members must represent civil society organisations independent of the government and state bodies, selected through an open, transparent and merit-based procedure from organisations active in fields including social policy, education, the labour market, health, the environment and climate, energy, sustainable development and transport, fundamental rights and non-discrimination, anti-corruption and transparency. According to the requirements, the committee should meet at least twice a year and may adopt recommendations by a simple majority of its members. The revision of the reform introduced only one substantial change: that the committee must continue to monitor the plan after 2026. At the same time, the general obligation to consult social partners and stakeholders regularly during implementation was replaced by an obligation to draw up a strategy defining their involvement.

In practice, the committee was set up but held its first meeting only in December 2023, and the experience of its civil society members since then has been that they received little information on the implementation of the plan. Minutes were published slowly, and the National Authority was slow to respond to members' enquiries. While an amendment of the RRP was put out for public consultation in 2025, the amendments actually submitted in summer 2026 were not consulted on: even the members of the monitoring committee received only a summary in advance and were

[86] K-Monitor: What Has the Hungarian Government Done About Freedom of Information since 2022?, 19 November 2024 https://k.blog.hu/2024/11/19/what_has_the_hungarian_government_done_in_freedom_of_information_since

[87] K-Monitor: Secret Study on Healthcare Reform: K-Monitor to Turn to the Constitutional Court and the European Court of Human Rights, 18 October 2024, https://k.blog.hu/2024/10/18/secret_study_on_healthcare_reform_k-monitor_to_turn_to_the_constitutional_court_and_the_european_cou

[88] Kúria, Pfv.IV.20.614/2025/8.

[89] Nemzeti Adatvédelmi és Információszabadság Hatóság, Helyreállítási és Ellenállóképességi Terv 87. Mérföldkő - Összefoglaló jelentés, (no date indicated) https://naih.hu/informacioszabadsag/helyreallitasi-es-ellenallokepessegi-terv-87-merfoldko-osszefoglalo-jelentes

otherwise informed about the actual NRRP after the Council adopted it. Since early December 2025, the Monitoring Committee has neither been convened nor taken any decision by written procedure, even though the revision of the plan and the first (and final) payment request both fell into this period.

Public consultation on draft laws

On a legislative level, **Milestone 89** under **Measure C8.R26** (Improving the quality of law-making and involvement of stakeholders and social partners in decision-making) has been complied with, but the enacted changes have brought limited results in terms of the efficiency of the public consultation process and the quality of law-making in general, and several problematic practices continued also after the change in the government. It continues to happen that the government circumvents public consultation by having MPs table draft legislation that is part of government policy, since in the case of bills submitted by MPs and parliamentary committees to the Parliament, consultation is not prescribed – this happened under the new government e.g. in the case of the 16th Amendment to the Fundamental Law[90] and an amendment to the Media Act,[91] while instead of a consultation, a five-day "public dialogue"[92] took place regarding the 17th Amendment to the Fundamental Law. In the light of this it is even more regrettable that milestone elements of the original RRP that aimed at the development of the capacity of the Office of the Parliament to help MPs and parliamentary committees prepare impact assessments and conduct stakeholder consultations for the bills proposed by them were achieved only partially[93] and were then abandoned by the new RRP.

Prescribing an eight-day public consultation period as a minimum resulted in ministries almost never providing a longer deadline, irrespective of the length and complexity of the draft law. The new RRP abandoned the milestone that foresaw a new impact assessment methodology for draft laws, leaving no guarantee that the inadequate quality of impact assessments and the summaries published about them will be improved. The regulatory target that the share of legislative acts which may fall under the exceptions when draft laws do not have to or must not be subject to public consultation shall be maximum 10% annually was reached in previous years, but documents acquired by the HHC via litigation show that ministries did not always comply with the milestone requirement that "the use of these exceptions shall be duly justified in writing, with a reference to the specific exception applied", and it even happened that they cited non-statutory grounds.[94] Furthermore, percentages can be artificially boosted while being in line with the law: e.g. in September 2026, the Ministry of Interior published 45 separate decrees for public consultation, with each of them only pertaining to changes in the names of counties, a technique used by the previous government as well.[95] Finally, oversight by the Government Control Office (KEHI) is not effective: documents (templates, assessment tables, etc.) acquired by the HHC via litigation show that both the reporting by the ministries to the KEHI and the assessment by the KEHI are more formal "checking the box" exercises rather than a meaningful assessment of the practice.[96]

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[90] See the Parliament's website: https://tinyurl.com/yx74xu6w.
[91] See the Parliament's website: https://tinyurl.com/3j2ndd5h.
[92] See: https://egyeztetes.kormany.hu/egyeztetes/tarsadalmi-parbeszed-az-alaptorveny-17-modositasarol.
[93] For more details, see: Amnesty International Hungary – Hungarian Helsinki Committee – K-Monitor – Transparency International Hungary, *Assessment of Hungary's compliance with conditions to access European Union funds*, November 2025, https://helsinki.hu/en/wp-content/uploads/sites/2/2025/12/HU_EU_funds_assessment_2025.pdf, pp. 41–42.
[94] Ibid., pp. 36 and 40.
[95] K-Monitor, *Public Consultation – There Would Be a Need for It*, 29 November 2024, https://k.blog.hu/2024/11/29/public_consultation_--_there_would_be_a_need_for_it
[96] For more details and links to the respective documents, see: Amnesty International Hungary – Hungarian Helsinki Committee – K-Monitor – Transparency International Hungary, *Assessment of Hungary's compliance with conditions to access European Union funds*, November 2026, https://helsinki.hu/en/wp-content/uploads/sites/2/2025/12/HU_EU_funds_assessment_2025.pdf, pp. 36 and 39–40.

In sum, the regulatory framework allows for a wide discretion that makes it relatively easy to circumvent the obligation of public consultation, and allows for a flawed practice, where non-compliance and only formal compliance remain without real consequences.

Reforms of the original RRP abandoned in the new RRP

The 2026 revision dropped several reforms of the original RRP altogether, mostly because they had not been fully implemented and could no longer be completed by the August 2026 deadline. This applies above all to the National Anti-Corruption Strategy (**former C9.R7, milestones 177–179**): the strategy was adopted seven and a half months late, without public consultation, and key commitments such as the regulation of lobbying and the revolving door were never implemented, so the Commission also considered in its Lifting proposal the related remedial measures unfulfilled. The procurement training and support schemes for SMEs (**C9.R14, milestones and targets 205–212**) were also dropped: the training missed its interim target while the cost-compensation scheme also underperformed. While there was indeed an awareness-raising campaign against gratuity payments in healthcare (**C9.R9**), there is no information available on how far the upgrade of the prosecution service's IT systems (**C9.R8**), and three digital public administration reforms (**C9.R28–R30**) were implemented.

ASSESSMENT OF COMPLIANCE WITH THE HORIZONTAL ENABLING CONDITION ON THE EFFECTIVE APPLICATION AND IMPLEMENTATION OF THE CHARTER OF FUNDAMENTAL RIGHTS

Independence of the judiciary

In relation to judicial independence as a horizontal enabling condition linked to the effective application and implementation of the Charter of Fundamental Rights, the measures required by the Commission's implementing decisions were the following: (i) the entry into force of legislative amendments to strengthen the role of the National Judicial Council (NJC); (ii) the entry into force of amendments to strengthen judicial independence of the Kúria; (iii) the entry into force of legislative amendments to remove obstacles to references for preliminary references to the CJEU; and (iv) entry into force of legislative amendments to remove the possibility for public authorities to challenge final decisions before the Constitutional Court. Although the Judicial Reform adopted in 2023[97] addressed the majority of these issues,[98] civil society organisations warned[99] that (i) the fulfilment of some of the enabling conditions with respect to judicial independence could not be regarded as fully complete, and (ii) subsequent legislation and implementing techniques had led to a regression in this area.

After the change of government, some limited improvements have taken place in the legal framework. As of 26 August 2026, Section 41 of Act XVIII of 2026 on Certain Legal Amendments

[97] Act X of 2023 on the Amendment of Certain Laws on Justice related to the Hungarian Recovery and Resilience Plan

[98] Reflecting this, Commission Decision C(2023) 9014 of 13 December 2023 adopted under Article 15(4) of the Common Provisions Regulation, the Commission approved the fulfilment of the enabling conditions with respect to judicial independence with a view to the 2023 Judicial Reform.

[99] Amnesty International Hungary – Hungarian Helsinki Committee – K-Monitor – Transparency International Hungary, Assessment of Hungary's compliance with conditions to access European Union funds, November 2025, pp. 45-57.

Required to Access European Union Funds amended Section 232/X of Act CLXII of 2011 on the Status and Remuneration of Judges, removing the possibility for members of the Constitutional Court who became judges before the 2023 Judicial Reform to be appointed to the appeals court of their choice. Furthermore, the 17th Amendment to the Fundamental Law introduced the judges' involvement in the nomination process of the presidents of the Kúria and the NJC (although the detailed statutory provisions of the procedures to be followed are yet to be adopted by the Parliament).[100]

Other than these, no legislative measures have been taken. However, the Prime Minister's first speech in the Parliament,[101] in which he expressly apologised to the judges who had been targeted by the previous government; the fact that the systematic governmental attacks on judges and the courts have ceased after the change of government; and a high level meeting between the NJC and the Minister of Justice[102] emphasising the need for regular and constructive dialogue are positive developments forecasting potential further improvements in the legal framework.

Academic freedom and public interest asset management foundations

Description of the issue raised in the Commission implementing decisions:[103]

The Commission stated that the new governance model of higher education institutions, entailing the transformation of most public universities to universities managed by public interest asset management foundations, seriously threatened the right to academic freedom enshrined in Article 13 of the Charter of Fundamental Rights. The Commission claimed that universities managed by public interest asset management foundations were exposed to the direct or indirect influence of the executive branch, since significant competencies over the organization and the operation of these institutions were transferred from their representative body, the Senate, to the Board of Trustees (BoT) appointed exclusively by the Government for an indefinite term. BoTs were in the position to determine all organisational and human resources related decisions including recruitment, promotion and dismissal of staff, with the BoT and the management appointed by the BoT exerting control over curricula, appointments of academics and over decisions on the content of teaching and research matters. The Commission highlighted that the legislation did not contain any selection criteria for BoT members related to their tasks, nor did the selection process involve the universities' academic community represented in the Senate. This has led to the BoTs generally having a very low representation of the academic community, with a very large proportion of the board members having direct links to the former government and/or the ruling party.

Steps taken by the Hungarian authorities:

The 16th Amendment to the Fundamental Law abolished the constitutional basis for public interest asset management foundations, and set out that the state itself will exercise the rights of the founder with regard to the existing ones.[104] As far as public interest asset management foundations managing higher education institutions are concerned, Act XVIII of 2026 transferred the following powers back

[100] The amendment also provides judges with a potential role in the removal of these two figures – a solution that has been criticised by professional organisations, as it may lead to divisions within the judiciary.
[101] See: https://www.theguardian.com/world/2026/may/10/hungary-peter-magyar-apologises-to-those-wronged-under-orban-in-first-speech-pm .
[102] https://obt-jud.hu/hu/dr-gorog-marta-igazsagugyi-miniszter-szakmai-megbeszelesre-hivta-meg-az-obt-t
[103] Commission Implementing Decision approving the programme "Economic Development and Innovation Operational Programme Plus" for support from the European Regional Development Fund and the European Social Fund Plus under the Investment for jobs and growth goal in Hungary, C(2022) 10009 final; Commission Implementing Decision approving the programme "Digital Renewal Operational Programme Plus" for support from the European Regional Development Fund and the European Social Fund Plus under the Investment for jobs and growth goal in Hungary, C(2022) 10007 final.
[104] 16th Amendment to the Fundamental Law, Articles 4–5

to the Senates from the BoTs: the adoption of the universities' statutes and budget, and powers related to selecting the rector, i.e. the head of the Senate (making recommendations on the content of the call for applications for the post of rector, assessing the applications and electing the candidate, and evaluating the rector's leadership performance).[105] The new rules limit the term of BoT members to 4 years (once renewable), and set out eligibility criteria for them.

Assessment of the steps taken:

Under the legal construct chosen by the legislator to tackle the issue of public interest asset management foundations, transferring powers of academic relevance back to the Senate alleviates former concerns with regard to academic freedom under Article 13 of the Charter, and, therefore, the horizontal enabling condition "3. Effective application and implementation of the Charter of Fundamental Rights" can be considered fulfilled in this regard.

Right to asylum and the principle of non-refoulement

Repealing the embassy system

Repealing the pre-procedure system introduced in Hungary in 2020 that must be completed in a Hungarian embassy in a third country before a third-country national who is present on Hungarian territory, including at its border, can make an application for international protection.

Description of the issue raised in the Commission implementing decision:[106]

On 27 May 2020, the Government introduced fundamental restrictions to access to asylum in the form of a decree later converted into an Act of Parliament (the so-called Transitional Act).[216] As a general rule, asylum-seekers are first required to express their intent to seek international protection at the Hungarian embassy in Serbia or Ukraine,[107] before they are able to access the asylum procedures in Hungary ("embassy system").[108] As a consequence, most foreigners within the territory of Hungary are summarily denied the possibility of submitting an asylum application and are instead directed to travel to either Serbia or Ukraine,[109] regardless of whether they have the legal right to enter those countries. Only people belonging to the following categories are not required to go through this process:[110]

- those having subsidiary protection status and are staying in Hungary;
- family members[111] of refugees and those having subsidiary protection who are staying in Hungary;
- unaccompanied children;
- those subject to forced measures, measures or punishment affecting personal liberty, except if they have crossed Hungary in an illegal manner.

[105] Act XVIII of 2026 on Act XVIII of 2026 on the Amendment of Certain Acts Necessary to Access European Union Funds, Section 133(2)
[106] Commission Implementing Decision approving the programme of Hungary for support from the Asylum, Migration and Integration Fund for the period of 2021–2027, C(2022) 10022 final, https://ec.europa.eu/transparency/documents-register/detail?ref=C(2022)10022&lang=en.
[107] Government Decree 292/2020. (VI. 17.), Section 1.
[108] Title I of Act L of 2025, available in Hungarian at: https://net.jogtar.hu/jogszabaly?docid=a2500050.tv.
[109] The HHC is not aware of any statement of intent ever being submitted at the Hungarian embassy in Ukraine.
[110] Section 5(1) of Act L of 2025.
[111] According to the Section 2(j) of the Asylum Act, family members are only spouses, minor children and children's parents or an accompanying foreign person responsible for them under Hungarian law. Adult children for example, are therefore excluded.

Technically, the embassy system was introduced *temporarily* in lieu of the previous automatic arbitrary detention system that was also found to be in breach of EU law by the CJEU in case C-808/18.[112]

The embassy system does not ensure an effective and genuine access to the asylum procedure in Hungary. The European Commission referred Hungary to the CJEU in July 2021 over these changes. The CJEU ruled on 22 June 2023 that by introducing the embassy system, "Hungary has failed to fulfil its obligations under Article 6 of [the Asylum Procedures Directive]."[113] The same provisions ensuring access to procedure are enshrined in the Asylum Procedures Regulation.[114] Despite the judgment, the provisions prescribing the embassy system have been extended regularly, without substantial changes to their content and are currently in force at least until 31 December 2026.[115]

Steps taken by the Hungarian authorities:

The government adopted Government Decision 1289/2026. (IX. 4.)[116] on the review of Hungary's asylum and border-management legislation. The decision does not commit the government to ensuring access to international protection or complying with the judgments of the CJEU. Instead, it makes changes to the legislation currently in force conditional on the outcome of negotiations concerning compensation for the financial burden arising from the EU fine and an EU contribution to the costs of border control. The Minister of Interior is required to submit a proposal by 1 November 2026, but the decision lays down no specific requirements regarding its content.

Assessment of the steps taken, main deficiencies:

To date, no concrete steps have been taken to ensure compliance with the CJEU judgment. The government, despite numerous requests, is not consulting organisations with decades of professional and legal-aid experience in the field of asylum on the substance or direction of the review.

Implementation of the CJEU's judgment in Case C-808/18 regarding push-backs and the rules and practices in the transit zones

Description of the issue raised in the Commission implementing decision:[117]

Hungary legalised push-backs (that is, collective expulsions), originally only from within an 8 km zone of the border fence erected at the Hungarian-Serbian and Hungarian-Croatian border sections in July 2016.[118] On 28 March 2017, significant asylum-related amendments entered into force. Among others, these prescribe that once a "state of crisis due to mass migration" has been declared by the Government, push-backs are to take place from the entire territory of Hungary.

[112] European Commission v. Hungary, Case C-808/18, ECLI:EU:C:2020:1029.
[113] Judgment of 22 June 2023 of the Court of Justice of the European Union in case C-823/21, European Commission v Hungary, ECLI:EU:C:2023:504.
[114] Section I of Chapter III of Regulation (EU) 2024/1348 of the European Parliament and of the Council.
[115] Section 8(2) of Act L of 2025.
[116] Full text of Government Decision 1289/2026. (IX. 4.) is available in Hungarian on the official site of the National Gazette: https://magyarkozlony.hu/hivatalos-lapok/XoBaLakWIxtQznwRon6w6a97130217cc9/dokumentumok/2a17cecc66652926a6dca741f24f3d80e4a2ad73/letoltes
[117] Commission Implementing Decision approving the programme of Hungary for support from the Asylum, Migration and Integration Fund for the period from 2021 to 2027, C(2022) 10022 final, https://ec.europa.eu/transparency/documents-register/detail?ref=C(2022)10022&lang=en.
[118] Hungarian Helsinki Committee, Latest amendments „legalise" extrajudicial push-back of asylum-seekers, in violation of EU and international law, 5 July 2016, https://helsinki.hu/wp-content/uploads/HHC-info-update-push-backs-5-July-2016.pdf.

The CJEU ruled in December 2020 in Case C-808/18 that, among others, Hungary, by prescribing the removal of unlawfully staying third-country nationals to the Serbian side of the border fence, without undertaking any identification or individualised procedure and without allowing such individuals to make an asylum application, failed to fulfil its obligations laid down in Directive 2008/115/EC,[119] as well as in Articles 7, 18, 19, 24, and 47 of the Charter.[120] As the Government expressed its unwillingness to implement the judgment and even requested the Hungarian Constitutional Court to rule on whether implementing it would be in breach of the Hungarian Fundamental Law,[121] the Commission decided to refer Hungary back to the CJEU based on Article 260 TFEU, requesting the Court to impose fines for not implementing the judgment.[122] This is unprecedented in Hungary's history as an EU Member State.

The remainder of the judgment in Case C-808/18 has already been implemented by the time of the delivery of the judgment. The transit zones were shut down in May 2020, following another CJEU judgment in which the CJEU found, among others, that placement in the transit zones constituted unlawful detention.[123]

On 13 June 2024, the CJEU issued its judgment in Case C-123/22, finding Hungary failing to fulfil its obligations for not implementing the judgment in Case C-808/18 and ordered Hungary to pay an unprecedented amount in lump sum (EUR 200 million) in addition to a daily EUR 1 million penalty payment.[124] The Court justified the extremely high lump sum amount with "the exceptional seriousness of the infringements at issue and Hungary's failure to cooperate in good faith in order to bring them to an end."[125]

Steps taken by the Hungarian authorities:

To date, no concrete steps have been taken to ensure compliance with the CJEU judgment. On the contrary, far from merely failing to act, the new government has taken an active step to perpetuate the violation. Through Government Decree 144/2026. (IX. 4.), the new government extended the state of crisis until 31 December 2026, which would have lapsed on 7 September.[126] Although this extension is shorter than the previous six-month extensions, the government has thereby continued to maintain a state of crisis that cannot be justified by objective circumstances and which enables the Police to carry out pushbacks from the entire territory of Hungary. On the same day, Government Decision 1289/2026. (IX. 4.)[127] was adopted on the review of Hungary's asylum and border-management legislation. The decision does not commit the government to

[119] Directive 2008/115/EC of the European Parliament and of the Council of 16 December 2008 on common standards and procedures in Member States for returning illegally staying third-country nationals.
[120] Case C-808/18 – Commission v Hungary, Judgment of the Court (Grand Chamber) of 17 December 2020, ECLI:EU:C:2020:1029, https://bit.ly/3Myh13m.
[121] For more on the application of the Minister of Justice to the Constitutional Court, and on the Court's decision, see: https://helsinki.hu/en/the-governments-attempt-at-sabotage-has-failed-and-the-cjeu-decision-must-be-implemented/.
[122] Case C-123/22. Casefile on the Court's website: https://infocuria.curia.europa.eu/tabs/affair?sort=AFF_NUM-DESC&searchTerm=%2522C%252D123%252F22%2522&publishedId=C-123%2F22. Press release of the European Commission of 12 November 2021 on referral to the CJEU: https://ec.europa.eu/commission/presscorner/detail/EN/IP_21_5801.
[123] See more on these preliminary reference rulings where the Hungarian Helsinki Committee provided legal representation to the applicants: https://helsinki.hu/en/hungary-unlawfully-detains-people-in-the-transit-zone/.
[124] Judgment in Case C-123/22 of 13 June 2024, ECLI:EU:C:2024:493.
[125] § 132 of the Judgment in Case C-123/22 of 13 June 2024, ECLI:EU:C:2024:493.
[126] Full text of Government Decree 144/2026. (IX. 4.), in Hungarian, is available on the official site of the National Gazette: https://magyarkozlony.hu/hivatalos-lapok/XoBaLakWIxtQznwRon6w6a97130217cc9/dokumentumok/2a17cecc66652926a6dca741f24f3d80e4a2ad73/letoltes
[127] Full text of Government Decision 1289/2026. (IX. 4.) is available in Hungarian on the official site of the National Gazette: https://magyarkozlony.hu/hivatalos-lapok/XoBaLakWIxtQznwRon6w6a97130217cc9/dokumentumok/2a17cecc66652926a6dca741f24f3d80e4a2ad73/letoltes

ensuring access to international protection or complying with the judgments of the CJEU. Instead, it makes changes to the legislation currently in force conditional on the outcome of negotiations concerning compensation for the financial burden arising from the EU fine and an EU contribution to the costs of border control. The Minister of Interior is required to submit a proposal by 1 November 2026, but the decision lays down no specific requirements regarding its content. The government, despite numerous requests, is not consulting organisations with decades of professional and legal-aid experience in the field of asylum on the substance or direction of the review.

Rights of LGBTQI+ persons

Description of the issue raised in the Commission implementing decisions

In June 2021, the Hungarian Parliament adopted Act LXXIX of 2021 (hereafter: the 2021 Act) on Stricter Action against Paedophile Offenders and Amending Certain Acts for the Protection of Children, which prohibits or limits access to content that "propagates" or "portrays" so-called "divergence from self-identity corresponding to sex at birth, sex change or homosexuality" for individuals under the age of 18.

The Commission considered that the provisions of the 2021 Act have a concrete, direct impact on compliance with the Charter both in relation to the European Regional Development Fund and the European Social Fund Plus,[128] amongst others in the area of education but also other services provided to children, training of teachers and child protection actions, training of parents and foster parent networks, and provision of mental and psychological support services.[129]

Therefore, the horizontal enabling condition "3. Effective application and implementation of the Charter of Fundamental Rights" was not fulfilled.

Steps taken by the Hungarian authorities

[128] In connection with the Implementing Decision approving the programme "Digital Renewal Operational Programme Plus" for support from the European Regional Development Fund and the European Social Fund Plus under the Investment for jobs and growth goal in Hungary (European Commission, C(2022)10007 final), in connection with Implementing Decision approving the "Economic Development and Innovation Operational Programme Plus" for support from the European Regional Development Fund and the European Social Fund Plus under the Investment for jobs and growth goal in Hungary (European Commission, C(2022) 10009 final), and in connection with the Commission Implementing Decision approving "Human Resources Development Operational Programme Plus" for support from the European Regional Development Fund and the European Social Fund Plus under the Investment for jobs and growth goal in Hungary (European Commission, C(2022) 10010 final).

[129] The content of training of teachers and child protection actions, such as provision of mental and psychological support services can disrespect the Charter as these actions are subject to compliance with the Act. The Act associates negative and pejorative characteristics with LGBTQI+ individuals, violating Article 1 of the Charter, which upholds equal human dignity, and Article 21 of the Charter by discriminating against LGBTQI+ individuals. By portraying LGBTQI+ people as inferior, the Act undermines the fundamental principle of equality. The Act also infringes on Article 7 of the Charter by failing to recognise gender identity as part of personal identity, thus limiting the right to respect for private life. By prohibiting the "propagation" or "portrayal" of content related to diverse sexual orientations or gender identities, the Act also infringes upon Article 11 of the Charter, hindering public discourse and access to diverse information, which creates a chilling effect on public and private speech. Excluding objective information on sexual orientation and gender identity fosters an unsafe environment, heightening risks of bullying, harassment, and mental health issues for LGBTQI+ youth. The 2021 Act dissuades applicants who may otherwise seek funding for projects that promote inclusivity, mental health support, and educational diversity. This not only reduces potential beneficiaries' participation but also limits the social and developmental impact that ESF+ projects could have in Hungary.

On 21 April 2026, the Court of Justice of the European Union in Case C-769/22 found that the 2021 Act is in breach of EU law.[130] In this landmark judgment, the Court, for the first time in the EU's history, also established a standalone violation of Article 2 TEU.

On 14 September 2026, Deputy Prime Minister Bálint Ruff submitted Bill T/680, which was adopted on 13 October 2026. The **legislation amended all the provisions that the CJEU in Case C-769/22 found in violation of EU law**. The new "Act on the amendment of certain laws aimed at strengthening the rights and safety of children" (hereafter: the 2026 Amendments)[131] amended

- Section 6/A of Act XXXI of 1997 on the protection of children and the administration of guardianship (the "Child Protection Act"),
- Section 8(1a) of Act XLVIII of 2008 laying down the basic requirements and certain restrictions applicable to commercial advertising activities (the "Advertisement Act"),
- Section 9(6) of Act CLXXXV of 2010 on media services and mass media communications (the „Media Act"),
- Section 9(12) of Act CXC of 2011 on national public education (the "Public Education Act") and
- Section 5/A of Act CCXI of 2011 on the Protection of Families (the "Family Protection Act")

by repealing the prohibition or restrictions of access to content that propagates or portrays the „divergence from self-identity corresponding to sex at birth, sex change or homosexuality" for individuals under 18. Therefore, the 2026 Amendments repealed the above-mentioned regulation from all the provisions that were explicitly found to violate EU law in the operative part of the judgment in Case C-769/22.

However, the 2026 Amendments did not repeal or amend those homo- and transphobic provisions that were introduced by the 2021 Act but not addressed in the infringement procedure. Section 3/A of the Child Protection Act and Section 1(2) of the Family Protection Act remains still in force, according to both of which "*the child's right to self-identity corresponding to their sex at birth"* shall be protected, and Section 1(1) of the Family Protection Act also remains in force that, among others, states that "*the mother is a female, and the father is a male".* These rules are also enshrined in the Fundamental Law in Article XVI(1) and Article L(1).

The 2026 Amendments kept the explicit reference to Article XVI(1) of the Fundamental Law in Section 9(12) of the Public Education Act. Section 9(12) of the Public Education Act was replaced by the following provision: "*When conducting classes for students on sexual culture, sexual life, sexual orientation, and sexual development, particular attention shall be paid to the provisions of Article XVI(1) of the Fundamental Law. Classes that conflict with Section 6/A of Act XXXI of 1997 on the Protection of Children and the Administration of Guardianship shall be prohibited".* This means it would retain the requirement that when conducting classes for students on sexual culture, sexual life, sexual orientation, and sexual development, particular attention shall be paid to children's "*right to a self-identity corresponding to the sex at birth"*.

The Venice Commission in Opinion 1035/2021 recommended to repeal this sentence from Article XVI(1) of the Fundamental Law, since various international human rights bodies have asserted that all individuals have a "right to a self-identity" based not only on their "sex at birth" (as the amendment suggests), but also on the basis of their "gender," the socially constructed characteristics and roles

[130] The primary and secondary law relating to services in the internal market, the Charter of Fundamental Rights of the European Union, Article 2 TEU and the General Data Protection Regulation (GDPR). In particular the CJEU declared that, by amending Paragraph 9(12) of the Act No. CXC of 2011 on national public education (the „Public Education Act"), Hungary has failed to fulfil its obligations under Articles 16 and 19 of Directive 2006/123, as well as Articles 1, 7, 11 and 21 of the Charter of Fundamental Rights.

[131] The passed T/680 bill is still awaiting the President's signature and has not yet been promulgated; its text is available on the parliament's website:https://www.parlament.hu/web/guest/folyamatban-levo-torvenyjavaslatok

for women and men. The Venice Commission stressed that "under the ECHR, gender identity is recognised as a component of personal identity, falling under the right to respect for private life".[132]

Section 9/A of the Public Education Act, as amended by the 2021 Act, also remains in force. It prescribes that besides teachers and professionals providing school health services, only those experts and civil society organisations that are registered by the organ designated by legislation may provide lectures on sexuality education, drug prevention, internet usage, or any other topics relating to mental and physical development in schools. It authorised the Minister responsible for education to issue the regulations which designate a state organ to maintain the registry of individuals and organisations that may hold such lectures. The competent Minister introduced the regulations on 12 June 2025.[133] The Ministry Decree provided for the registration of educational activities about "the harmful effects of drug use, the dangers of the internet and other physical and mental health promotion", but did not include all of the topics listed in Section 9/A (1) of the Public Education Act, as it lacks topics such as "sexual culture, sex life, sexual orientation, and sexual development". **The lack of adequate regulation might still restrict civil society organisations' educational programmes about "sexual culture, sex life, sexual orientation, and sexual development"**, but currently there is no practical experience showing that registration excludes sessions on homosexuality or gender diversity.

Assessment of the steps taken, main deficiencies

The 2026 Amendments repealed all the provisions from the 2021 Act that prohibited or restricted access to content that propagates or portrays the „divergence from self-identity corresponding to sex at birth, sex change or homosexuality" for individuals under 18.

By repealing all the provisions explicitly addressed in the infringement procedure and the CJEU judgment, the 2026 Amendments remove the restrictions on projects promoting diversity and combating discrimination, as well as the significant risk of dissuading potential eligible beneficiaries and contractors from applying for funding or participating in tenders.

It must be underlined that the 2026 Amendments failed to entirely remedy the systemic nature of violations of the 2021 Act or address unrelated legislation and their constitutional basis that violates the rights of LGBTQI+ individuals. The Ninth Amendment of the Fundamental Law introduced that Hungary shall protect children's right to a self-identity corresponding to the sex at birth prior to the 2021 Act, and Article XVI(1) of the Fundamental Law was not identified as a restriction on the effective application of the Charter in the three relevant Implementing Decisions, therefore, the Hungarian Government took adequate steps to address the violations identified in the implementing decisions.

In conclusion, with the adoption of the 2026 Amendments, the violations identified in the three relevant Commission Implementing Decisions have been adequately remedied, and, therefore, the horizontal enabling condition "3. Effective application and implementation of the Charter of Fundamental Rights" can be considered fulfilled.

[132] Venice Commission Opinion 1035 / 2021 on The Constitutional Amendments Adopted by The Hungarian Parliament in December 2020 ,(CDL-AD(2021)029), para [36]

[133] Decree No. 18/2025. (VI.4.) of the Ministry of Interior on the amendment of Decree 20/2012. (VIII. 31.) of the Ministry of Education and Science on the operation of educational institutions and the use of names of public educational institutions.