



2025 REPORT

SLAPPS IN EUROPE:

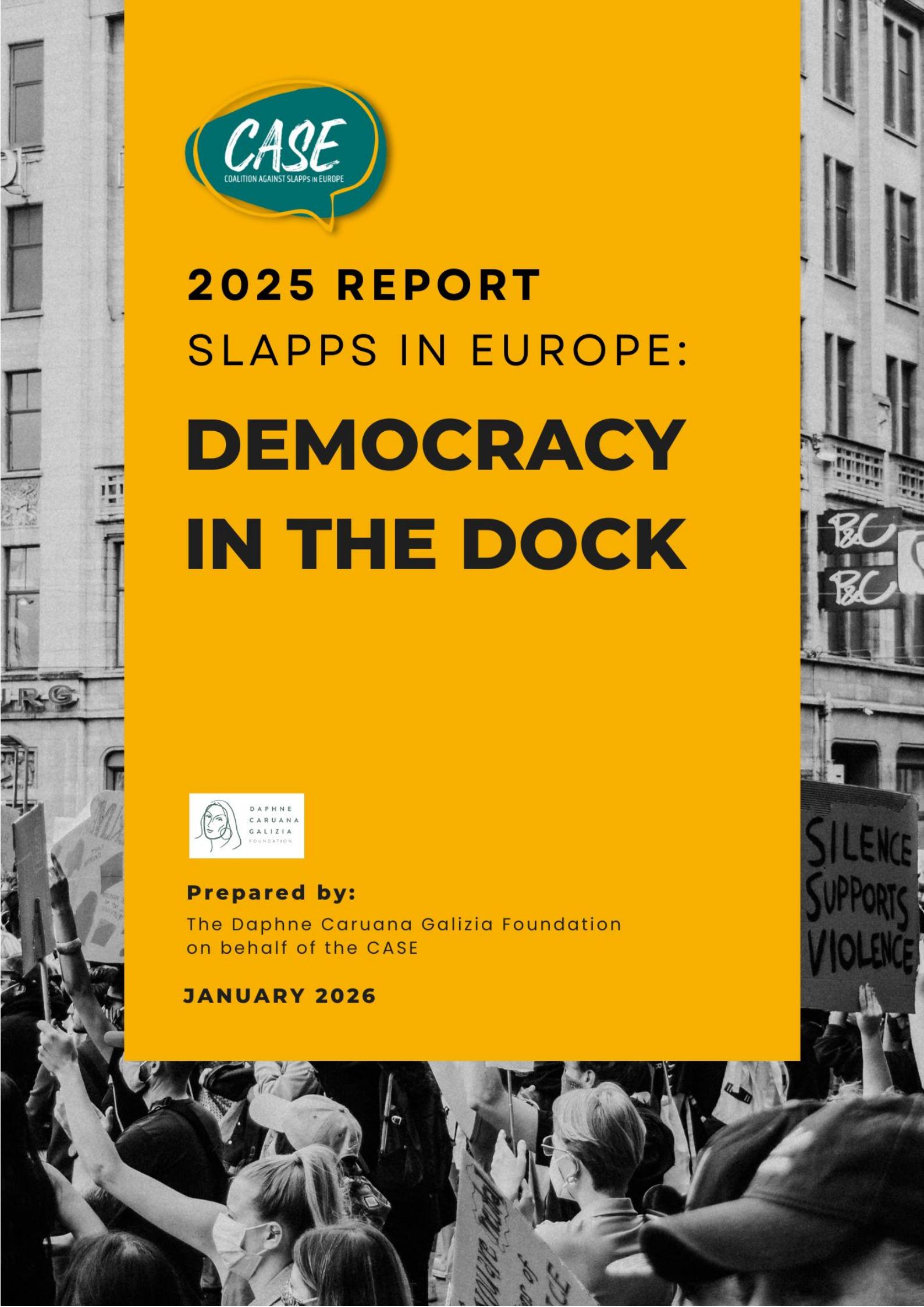
DEMOCRACY IN THE DOCK



Prepared by:

The Daphne Caruana Galizia Foundation
on behalf of the CASE

JANUARY 2026





A 2025 Report on SLAPPs in Europe: Democracy in the Dock

This report was prepared by The Daphne Caruana Galizia Foundation on behalf of the Coalition Against SLAPPs in Europe and published in January 2026.

FOURTH EDITION

Acknowledgements

Firstly, we would like to again thank the Amsterdam Law Clinics (ALCs) who established the methodology and primary data set used in CASE's first report, upon which subsequent editions were developed.

We would also like to thank all the CASE member organisations and the national experts we are connected to, who frequently provide information on lawsuits in their countries for CASE's mapping and advocacy purposes, and who make such mapping efforts possible.

Last, but not least, we want to acknowledge the targets who were indirectly involved in this study, many of whom reached out to the mapping team throughout 2024 to 2025 to provide information about their respective cases. Their resilience in 2024 – a year in which SLAPP tactics continued to evolve with increasing sophistication and reach – reminds us that the struggle over free and open discourse now unfolds far beyond the traditional confines of the newsroom or the courtroom. Our hope is that this research strengthens the collective resolve to confront these practices and ensure that scrutiny, dissent and public-interest expression are met with dialogue rather than legal intimidation. Only then can the civic space on which democracies depend remain vibrant, fearless, and truly public.



About the Coalition Against SLAPPs in Europe (CASE)

CASE is a broad coalition of over 120 non-governmental organisations from across Europe, united in recognition of the threat posed to public watchdogs by SLAPPs (Strategic Lawsuits Against Public Participation). Pursued by wealthy and powerful litigants, SLAPPs are an abuse of the legal system and a threat to democracy. They attempt to intimidate and silence public watchdogs through lengthy and expensive litigation that drains a target's resources and chills critical voices. On behalf of journalists, activists, whistleblowers, rights defenders and other watchdogs targeted by these tactics, CASE works to expose legal harassment and intimidation, to protect the rights of those who speak out, and to advocate for comprehensive protective measures and reform. In the last four years, CASE has worked to convince European Union institutions and Member States to legislate against SLAPPs. Besides advocacy on EU and national levels, CASE has also built up an extensive database on SLAPP lawsuits and provided advocacy for targets of such lawsuits.

About the Daphne Caruana Galizia Foundation

The team at The Daphne Caruana Galizia Foundation ("the Foundation") is inspired by Daphne Caruana Galizia's life, journalism, and unwavering commitment to the public interest. Daphne was facing 48 vexatious lawsuits at the time of her death. These cases were inherited by her family and continued being fought in court following her death. The Foundation's mission is to ensure that there is justice for Daphne's assassination, for the stories she reported on, and to continue her fight for press freedom and protection of human rights. The Foundation was at the forefront of the advocacy work to end SLAPPs in Europe. In April 2024, the EU's anti-SLAPP directive, also known as Daphne's Law, was adopted by the European Parliament.

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Introduction

Since the Coalition Against SLAPPs in Europe (CASE) began its comprehensive mapping, **1,303** SLAPP cases have been identified across the period between 2010 and 2024. The increasing numbers demonstrate that the threat to freedom of expression shows no sign of abatement, with 167 new SLAPPs initiated in 2024 alone. These vexatious lawsuits, often dressed up as a defamation claim, are not designed to secure legal victory, as evidenced by numerous cases where the case is dropped by the plaintiff prior to the completion of the justice process, but to inflict debilitating psychological, financial and reputational harm, thereby inducing a powerful 'chilling effect' on fundamental freedoms guaranteed by the European Convention on Human Rights (ECHR).

2024 marked a pivotal legislative development with the adoption of the EU Anti-SLAPP Directive (Directive (EU) 2024/1069)¹ paired with the Commission Recommendation (EU) 2022/758,² and further reinforced by the Council of Europe Recommendation CM/Rec(2024)2.³ CASE supports this milestone as the first binding framework expressly designed to protect public participation.

Nevertheless, significant challenges persist. Experts in the field have pointed out that the Directive offers only minimum harmonisation and confines itself to **cross-border civil and commercial cases**, leaving the vast majority of **SLAPPs that are domestic**, the daily battleground of journalists and activists, beyond its immediate reach.⁴

¹ Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded or abusive court proceedings ('Strategic lawsuits against public participation'), OJ L 2024/1069, 16.4.2024, ELI: <http://data.europa.eu/eli/dir/2024/1069/oj>.

² Commission Recommendation (EU) 2022/758 of 27 April 2022 on protecting journalists and human rights defenders who engage in public participation from manifestly unfounded or abusive court proceedings ('Strategic lawsuits against public participation'), OJ L 138, 17.5.2022, pp. 30-44, ELI: <http://data.europa.eu/eli/reco/2022/758/oj>.

³ <https://rm.coe.int/0900001680af2805>

⁴ See Justin Borg-Barthet, interview in *The Malta Independent*, noting the Directive's "slightly constrained" scope and that Malta "made no attempt to go beyond the bare minimum" in transposing a law that only covers cross-border civil and commercial cases: <https://www.independent.com.mt/articles/2025-03-30/local-news/There-was-no-attempt-to-go-beyond-the-minimum-with-anti-SLAPP-law-expert-6736268972>; See also Coalition Against SLAPPs in Europe (CASE), *CASE Annual Report 2024*, warning that "the overwhelming majority of SLAPP cases may fall outside the Directive's scope unless Member States exceed minimum implementation": https://www.the-case.eu/wp-content/uploads/2024/12/CASE-2024-report-vf_compressed-

Entering 2025, three significant milestones define the current European legal landscape. First, the year opened with the launch of the European Anti-SLAPP Monitor⁵, an ECPMF and CASE initiative that casts much-needed light on how each Member State is progressing, or procrastinating, in implementing both the EU Directive and the Council of Europe Recommendation. By monitoring and classifying national efforts, the Monitor introduces a new form of democratic weather report: tracking storm fronts, high-pressure zones and the occasional unexpected clearing. It also serves as an accountability and transparency tool to keep the implementation in check. As of December 2025, the Anti-SLAPP Monitor shows that the majority of Member States are not likely to meet the May 2026 transposition deadline.⁶

Second, Member States have embarked, unevenly and at varying speeds, on the transposition process ahead of the 7 May 2026 deadline. While several national parliaments have initiated debates and tabled draft legislation, early indications revive a familiar concern: that implementation may stop short at the Directive's minimum threshold.

Third, civil society continues its steady drumbeat. Joint submissions to the 2025 EU Rule of Law Report sound a clear and urgent refrain. Despite new legislative tools, SLAPPs remain insufficiently addressed across Europe.⁷ Monitoring organisations warn that meaningful reform requires more than transposition. It demands political will, structural safeguards, and the courage to confront the actors who misuse the law.

^{1.pdf} See CASE Statement, criticising EU governments for taking a "restrictive approach" which "would leave outside its scope most SLAPPs ... just because the parties are in the same jurisdiction." <https://www.the-case.eu/latest/governments-agreed-stance-on-eu-anti-slapp-directive-a-disappointing-failure-to-support-the-adoption-of-robust-safeguards-for-public-watchdogs/>.

⁵ European Anti-SLAPP Monitor, "About" and "Launch of the European Anti-SLAPP Monitor," European Centre for Press and Media Freedom (ECPMF) / Coalition Against SLAPPs in Europe (CASE), launched September 2025, available at: <https://slapp-monitor.eu/>.

⁶ <https://slapp-monitor.eu/>

⁷ Joint Civil Society Contribution on Civic Space to the 2025 EU Rule of Law Report, Civil Society Europe, 2025, p. 3, <https://civilsocietyeurope.eu/wp-content/uploads/2025/06/Joint-Civil-Society-Contribution-on-Civic-Space-to-the-2025-Rule-of-Law-Report.docx.pdf>. See also, Civil Liberties Union for Europe (Liberties), *Media Freedom Report 2025*, p. 75 and European Association for Private International Law (EAPIL), *First Meeting and Questionnaire of the Working Group on Anti-SLAPP Directive Transpositions*, report, 21 July 2025, pp. 1-2 (noting concerns over fragmented national transpositions and the need for structural safeguards).

As Member States move into the critical transposition phase in 2025, CASE continues to monitor these developments closely, underscoring that genuine progress will depend on whether national frameworks extend protections beyond the Directive's limited scope to encompass all forms of abusive legal action against public participation.

This report does not purport to present an exhaustive account of all SLAPP cases in Europe. For reasons that we will elaborate on in the 'limitations' section of this report, a scoping study can only illuminate part of a much larger and evolving phenomenon. Nonetheless, the findings presented herein offer a meaningful and evidence-based snapshot of documented cases between 2010 and 2024, revealing persistent patterns, emerging risks, and the continued normalisation of abusive litigation as a tool to silence public participation.

Beyond its empirical value, this report serves as both a record and a renewed call to action. It underscores the urgent need for comprehensive legal and policy responses that align with international human rights standards and uphold the fundamental principle that democratic resilience depends on the ability of individuals to speak truth to power without fear of reprisal. In this spirit, CASE reaffirms its commitment to **monitoring, documenting, and advocating** for robust Anti-SLAPP frameworks that ensure public participation remains a protected and vital feature of European democracy.

Following the publication of the 2024 CASE report, another 234 cases were collected, with 167 of those cases filed in 2024 and 67 filed in previous years.

Methodology

Data collection for this report followed the same methodology used in the 2022 - 2024 report, a "snowball sampling" method.⁸ State censorship cases were again excluded from the database while cases filed by government figures in their private capacity were included. The report excluded administrative and criminal matters

⁸ Snowball sampling refers to a method of chain referral sampling that involves "collecting a sample from a population in which a standard sampling approach is either impossible or prohibitively expensive, for the purpose of studying characteristics of individuals in the population." See more in: Handcock, M. S. and Gile K. J. (2011). "On the Concept of Snowball Sampling". *Sociological Methodology*, 41(1), p. 368. Retrieved from: <https://arxiv.org/pdf/1108.0301.pdf>

initiated by executive bodies on their own volition rather than as a response to a private complaint.⁹

It is important to note that countries with low reported numbers of SLAPPs may, nevertheless, experience high levels of state censorship including legal intimidation from the state. Therefore, the number of SLAPPs should not be taken as a reflection of the degree to which expression is free. Member organisations of CASE, from a broad range of countries in Europe, provided information on SLAPP cases in their countries as they happened throughout 2024. Occasionally, cases from previous years also emerged, details of which were also provided to the CASE mapping team to input into the SLAPPs Database.

For the lawsuits filed between 2010 and 2021, the majority of cases were compiled, assessed, and verified by researchers at the Amsterdam Law Clinics. NGOs, media outlets, journalists, activists, politicians, and others around Europe had helped to contribute information on SLAPP cases filed in 29 European jurisdictions from 2010 to 2021, namely Albania, Austria, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Kosovo, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Switzerland, Turkey, United Kingdom, and Ukraine. Based on this data, CASE identified 570 legal cases from across Europe as SLAPPs from 2010-2021, as assessed against the indicative qualities described in Figure 1. While the report primarily focuses on developments in 2024, data relating to earlier years have been updated where new reports or evidence concerning those periods became available.

Again, by analysing the updated database, trends and patterns continued to solidify and in some instances were altered by the additional data.

Other methods of assessing the data included the following:

- **Assessing publicly available information.** Research was conducted through the use of online materials, including media and academic articles, court judgments, reports by NGOs and international organisations, and domestic legislation.
- **Emails and interviews.** These were conducted with various CASE members, as well as journalists, academics, lawyers, and other stakeholders.

⁹ See pg. 12.

- **CASE's contact form.** In numerous cases, it was SLAPP targets themselves who approached CASE with information about the lawsuits they are currently faced with, either to reach out for advocacy purposes, or to simply provide their information for mapping purposes. Such documentation has increased as CASE's mission has become more recognised and publicised.

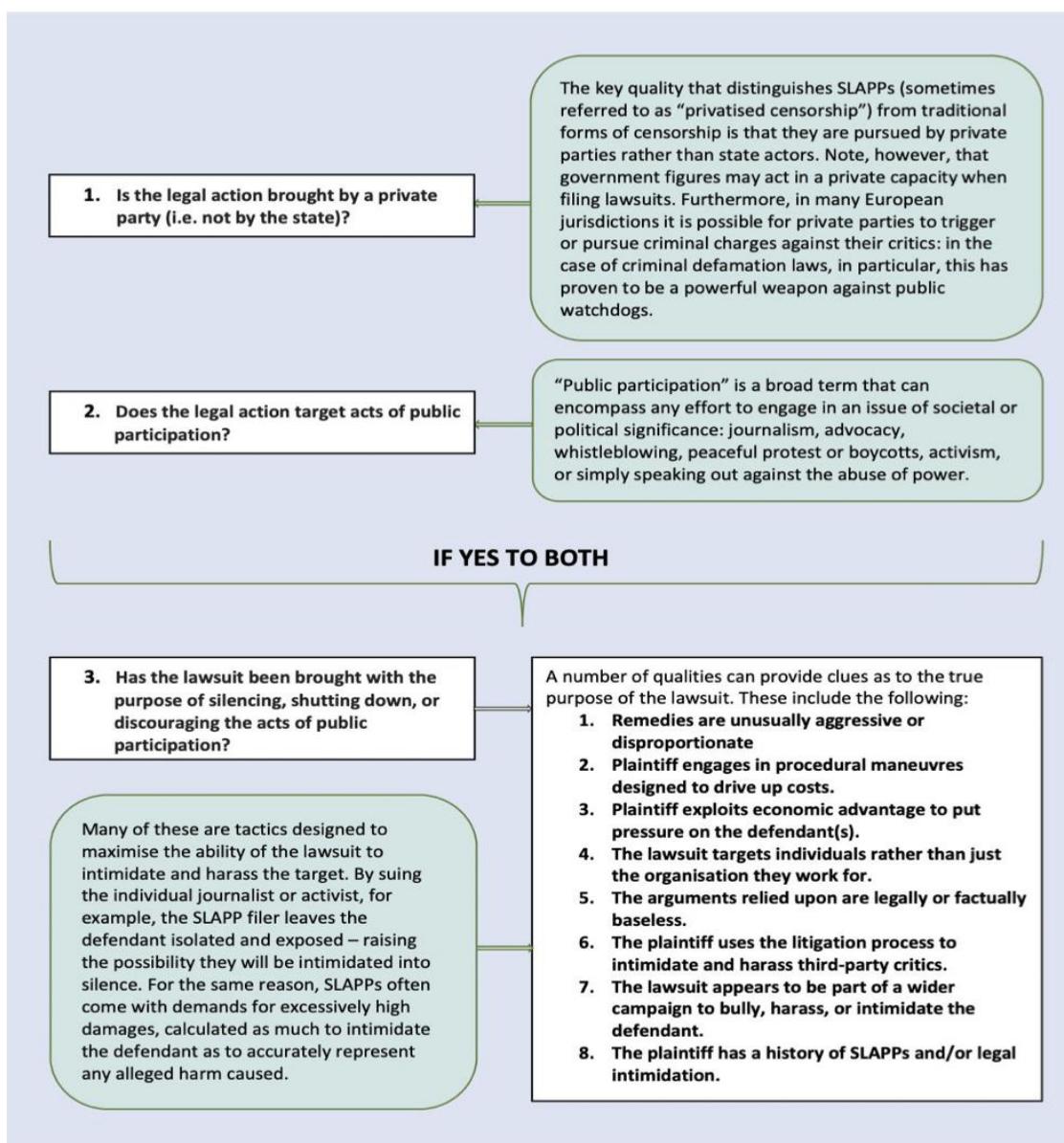


Figure 1 – Identifying a SLAPP flowchart¹⁰

¹⁰ The Coalition Against SLAPPs in Europe, available at <https://www.the-case.eu/slapps/>

Limitations

While this data helps to illustrate the nature of SLAPPs in Europe and identify the conditions that give rise to SLAPPs, it cannot fully represent the full scale of the problem for several reasons, including the following:

- Given the sheer quantity of legal threats received by media outlets and other public watchdogs - and the practical difficulties involved in cataloguing these threats - the data gathered for this report only covers court-recorded lawsuits and does not include aggressive legal threats. The report therefore does not cover the extent to which the act of issuing an aggressive legal threat can itself shut down acts of public participation (i.e., by causing an immediate retraction).
- Efforts to collect SLAPPs are impeded by the chilling effect such lawsuits create, with many SLAPP victims preferring not to draw attention to their case out of fear of further retaliation or reputational damage. Consequently, some cases are publicised only much later - sometimes even years after the fact - once the situation has stabilised or the proceedings have concluded, precisely because the intimidation inherent in SLAPPs suppresses earlier disclosure.
- In certain countries, such as Croatia,¹¹ CASE found that journalists, activists, and/or media outlets are so inundated with lawsuits that compiling information about each case would require resources that the target does not have access to. For this reason, a number of SLAPP lawsuits go underreported, especially since each lawsuit would have to be analysed for specific criteria before classifying it as a SLAPP.

In some instances, obtaining information about lawsuits requires complicated and time-consuming tasks, such as obtaining judgments through Freedom of Information requests, that CASE did not have the capacity to undertake.

¹¹ In a 2025 survey, the Croatian Journalists' Association (CJA) reports at least 696 active lawsuits against journalists and media outlets in Croatia (civil defamation and other suits), with total claimed damages of over €3.1 million.

Terminology

Prior to presenting the data, it is necessary to set out the terminology that is used throughout the report as well as define SLAPPs and their various elements.

SLAPPs: legal actions that are threatened, initiated or pursued as a means of harassing or intimidating their target, and which seek to prevent, inhibit, restrict or penalise free expression on matters of public interest and the exercise of rights associated with public participation, including public interest journalism, peaceful protest or boycotts, advocacy, whistleblowing, academic comments, or simply speaking out against the abuse of power. SLAPPs target anyone who works to hold the powerful to account or engage in matters of public interest: so-called "public watchdogs". This broad category includes journalists, activists, rights defenders, whistleblowers, campaigning organisations, unions or trade associations, and academics. Ultimately, the categorisation of a case as a SLAPP is a value judgement, since one can only ever infer an improper purpose from the circumstances of the case.

Public watchdog: SLAPPs target a range of societal actors, united by a common function of holding the powerful to account and exposing wrongdoing. Some of the public watchdogs most frequently targeted by SLAPPs include:

- journalists, particularly investigative reporters,
- activists, particularly environmental and transparency/anti-corruption activists,
- human rights defenders,
- civil society organisations, in particular NGOs and campaigning organisations,
- academics,
- whistleblowers, and;
- trade unions and professional associations.

SLAPP tactics: These can take various forms, including legal threats that do not proceed to lawsuits, and the number of these cannot be accounted for in this report. When SLAPP tactics are employed, very often the acts of public participation are shut down even before a lawsuit is initiated and the victims are so fearful that they

do not speak about it, especially since a SLAPP threat routinely includes a ban on publication or public discussion of the threat.¹²

Cross-border cases: A cross-border case is classified as such when the plaintiff and the defendant are domiciled in different countries, or the domicile of either party differs to that of the court seized of the matter (e.g., a Romanian journalist sued in London). For the purposes of CASE's analysis, this definition is applied narrowly. By contrast, the EU Anti-SLAPP Directive adopts a broader understanding of cross-border elements.

Politicians/public services: This category refers to any holder of an elected office, as well as individuals who are professionally involved in politics and/or the civil service. Members of the judiciary are not included in this category.

State-owned entities: This includes entities that are state-owned and state-controlled, as well as those that are substantially state-funded.

Public participant: A public participant is any natural or legal person engaged in matters of public interest.

Public participation: Any behaviour of a natural or legal person directed at engagement on a matter of public interest through the disclosure, dissemination or promotion to the public in any form of information, findings, ideas, opinions or testimonies, and any preparatory action thereof. This includes the exercise of freedom of expression and information, assembly, association and other rights relevant to participation, such as access to justice.

Population: This refers to the data collected for the purpose of this research, which is a sample size of the total number of SLAPP cases filed throughout Europe from 2010 and 2024.

Legal basis: This refers to the basis of the legal claim. SLAPP cases are typically based on defamation but can also concretise on other legal grounds, including torts, labour law, GDPR and privacy law, and injunctions.

¹² At present, the mapping exercise is limited to formal SLAPP actions that have reached a court or equivalent adjudicatory body. While threats, intimidation, and other forms of extrajudicial pressure are highly relevant to understanding the broader SLAPP environment, they are not independently counted as cases unless they culminate in, or are intrinsically linked to, formal legal proceedings. See Directive (EU) 2024/1069, which recognises that intimidation, harassment, or threats may indicate an abusive purpose within SLAPP litigation, including when such conduct occurs before or during proceedings.

Public interest: This report maintains a broad interpretation of public interest. It includes all that can be related to a shared political, social, economic, environmental, or other, concern, also having regard to the potential or actual impact on the welfare of society or part of it.

Presenting the updated data

1. Number of SLAPP lawsuits around Europe

Following the publication of the first report in 2022, SLAPP lawsuits continued to be filed in subsequent years, while additional cases from earlier periods were identified and incorporated into the CASE database. From 1,049 cases that were analysed in the 2024 Report, CASE's database increased to over **1,303 cases - 167 of which were filed in 2024**. This increase is particularly notable given that the strict methodological approach excluding cases of state censorship had already been in place since last year.

In our methodology, state censorship cases are treated distinctly from SLAPPs brought by private or quasi-private actors. While both can exert a chilling effect, state-driven censorship involves direct governmental restrictions - such as administrative bans, regulatory sanctions, or other exercises of public authority - rather than the misuse of civil or criminal legal processes by powerful individuals or entities. For this reason, and to preserve conceptual and methodological consistency, such cases are excluded from the SLAPP dataset unless the state acts in a manner functionally equivalent to a private litigant initiating abusive legal action.

Growth

Throughout 2024, the trend observed in the previous year persisted, with the number of mapped SLAPP cases increasing. At the same time, lawsuits from prior years rose as new cases were identified and documented. As a result, not only were more cases filed in 2024 (167) compared to the 2023 figure (166), but additional earlier cases were also recorded.

Again, in some European jurisdictions, this was more noticeable than in others, and it is important to note that, due to limitations mentioned previously, in some countries, the number of lawsuits mapped by CASE may only be the tip of the iceberg. During the data collection stage, the team identified (but were unable to verify) a number of SLAPPs reported by other organisations. These cases were not included in the database.

Cases recorded annually

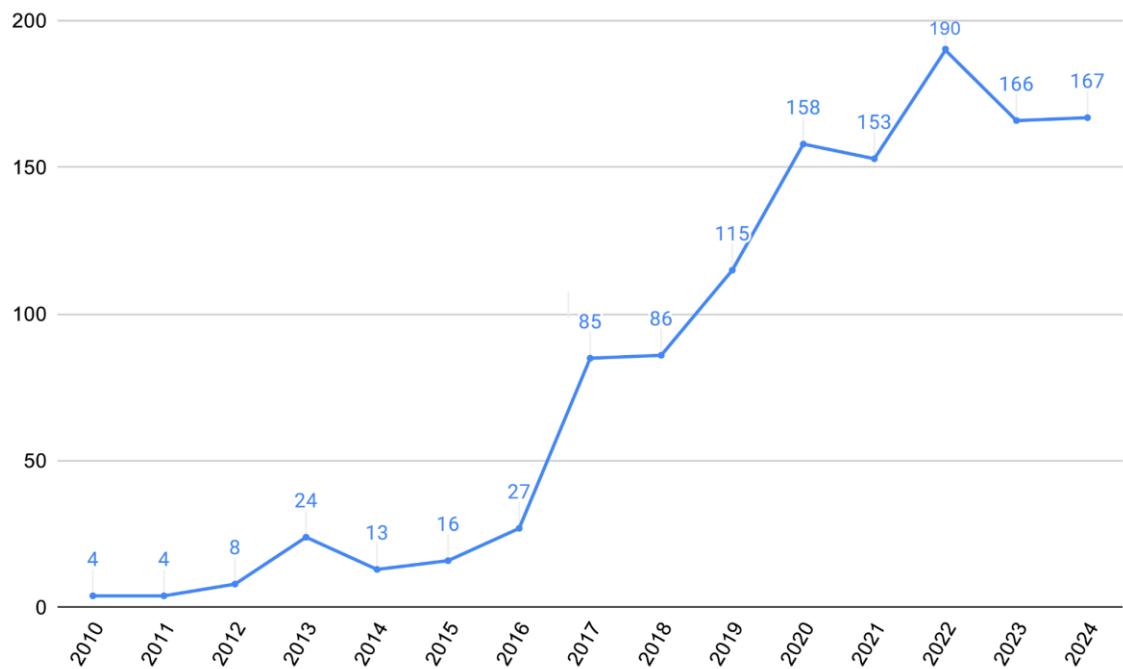


Figure 2 - CASE-recorded SLAPP legal cases from 2010 to 2024

SLAPPs per country

In 2024, a notable number of SLAPPs were filed in Italy (21), Germany (20), Serbia (13), Hungary (12) Turkey (10), and Ukraine (10). The number of SLAPPs in Italy persists even as this report employed increased vigilance to filter out cases of state censorship. Again, this year, Italy recorded the highest number of SLAPPs.

SLAPPs per country per year

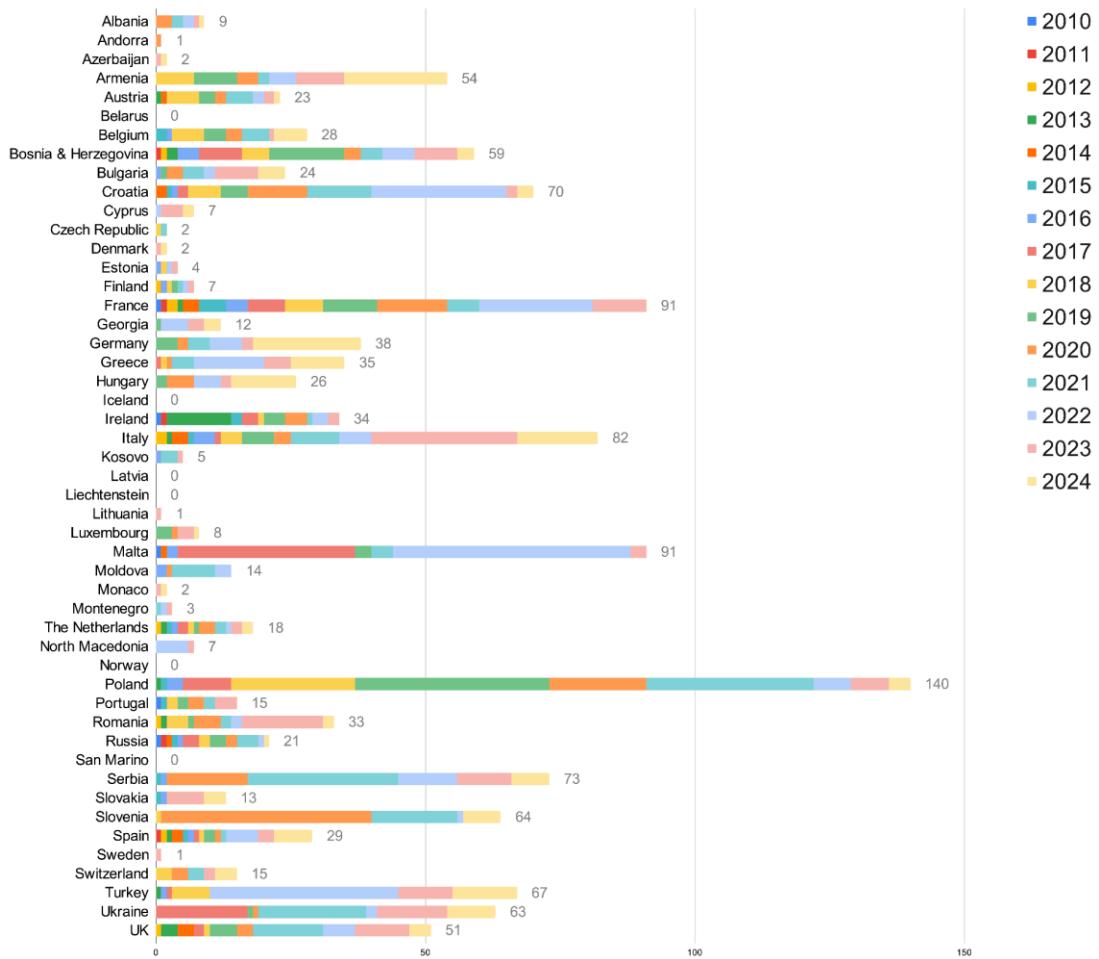


Figure 3 - CASE-recorded SLAPP legal cases per country per year 2010-2024

Legal basis

By the end of 2024, the majority of cases filed were civil lawsuits (65%), while 20% were criminal lawsuits.¹³ 2.5% of cases included both civil and criminal claims, 5.4% of cases were injunctions, less than 1% of cases were constitutional or administrative claims, with the legal basis in 4.2% unknown. This represents a slight increase in the proportion of cases that are based in both criminal and civil law as compared with

¹³ Criminal prosecutions on behalf of private parties, whether brought by the State or the private party itself.

the previous report where 2% of cases were criminal lawsuits. **As a baseline, only five EU Member States have decriminalised defamation.**¹⁴ Even among the countries that have decriminalised defamation, two – Cyprus and the UK – still retain certain criminal defamation offences,¹⁵ only Ireland, Malta, and Romania have fully abolished defamation as a criminal offence.¹⁶

Legal Basis

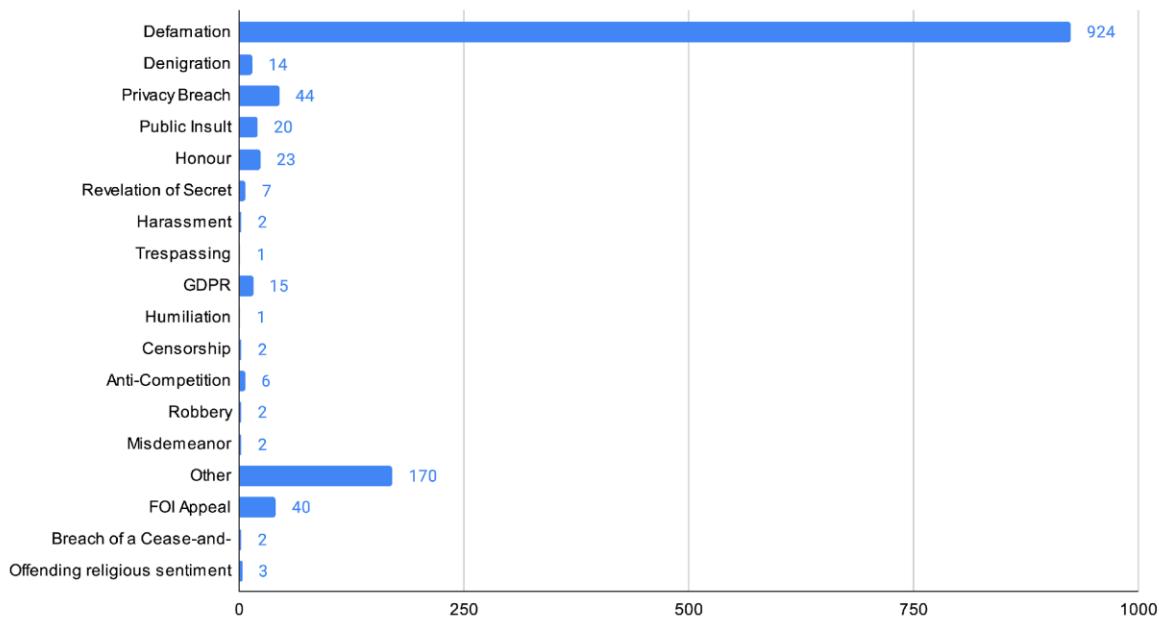


Figure 4: CASE-recorded SLAPP cases 2010-2024 - legal basis of claim

While the large majority of lawsuits are based on national defamation laws (both criminal and civil) or similar provisions on insult or honour, a number of other legal grounds were relied upon as a vehicle for SLAPPs, as illustrated in Figure 4. These include data protection claims (often framed under GDPR), privacy and personality rights actions, intellectual property claims, commercial and competition law disputes. In several jurisdictions, procedural tools such as interim injunctions,

¹⁴ This refers to *general defamation against private persons*, and that criminal-law risks persist in many others under other headings (insult, state-related defamation etc.).

¹⁵ This means that the general offence of criminal defamation may have been abolished, but there are certain narrower offences (perhaps defamation of a foreign head of state or something like that) that are still in place.

¹⁶ "Decriminalization of defamation" (CMPP and EUI, January 2019) available at https://cmpf.eui.eu/wp-content/uploads/2019/01/decriminalisation-of-defamation_Infographic.pdf

precautionary warrants, or strategic criminal complaints were also deployed to exert pressure.

Geographical spread

In CASE's first report, the data collected covered 29 European countries, namely: Albania, Austria, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Kosovo, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Russia, Serbia, Slovakia, Slovenia, Spain, Switzerland, Turkey, United Kingdom, and Ukraine. The second report widened the geographical spread, identifying SLAPPs in Georgia, North Macedonia, Greece, Cyprus, Moldova, Czech Republic and Sweden. The third report recorded SLAPPs in countries that had remained absent from previous reports, including Monaco, Lithuania, Azerbaijan, and Denmark. Likewise, the fourth report has now identified SLAPP lawsuits in two new countries: Montenegro and Andorra, bringing the total up to 43 countries across Europe.

2. Cross-border cases

Cross-border cases

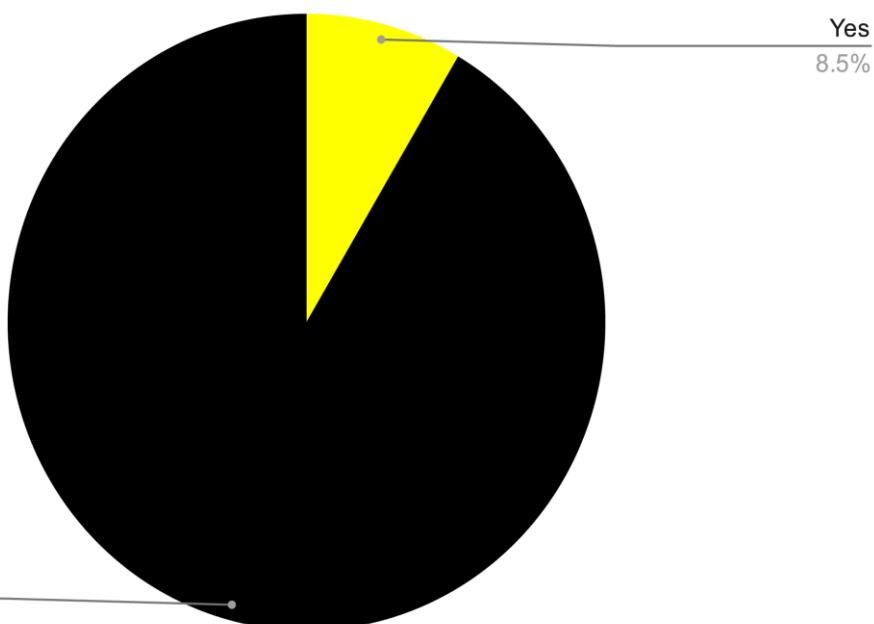


Figure 5: CASE-recorded SLAPP legal cases from 2010 - 2024 - cross-border

Out of the cases recorded between 2010 and 2024, 8.5% were cross-border cases based on the narrowest possible definition of “cross-border” meaning the plaintiff and the defendant are domiciled in different countries, or the domicile of either party differs to that of the court seized of the matter. Figure 5 illustrates that, again, the overwhelming majority of SLAPPs occur in a domestic context.

The EU Directive adopts a broad conception of “cross-border,” covering all cases in which both parties are not domiciled in the same Member State as the court seized, or where relevant elements of the situation extend beyond that Member State. Consequently, even in cases where both parties reside in the same country – as is true for over 90% of the cases reported here – if the act of public participation or public interest matters carries significance in more than one Member State, the case falls within the Directive’s scope.

Our working definition of ‘cross-border’ is necessarily narrower than the full scope contemplated by the Directive, as we often cannot ascertain whether a claim is connected to another jurisdiction through choice-of-court or choice-of-law clauses, nor can we identify cross-border elements arising from contractual relationships between the parties. These limitations stem from the fact that such information is often unavailable in the publicly accessible materials on which our dataset relies.

3. Who is the SLAPP Target?

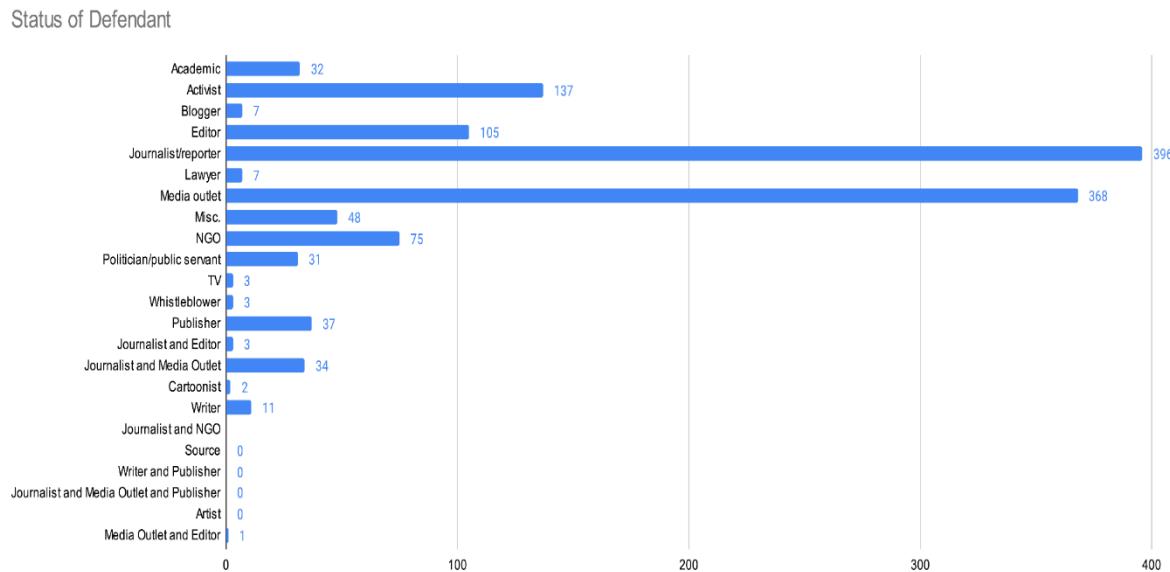


Figure 6: CASE-recorded SLAPP legal cases from 2010 - 2024 - status of defendant

Figure 6 indicates that, cumulatively, journalists appear as the most frequent SLAPP targets, followed closely by media outlets, activists, editors and NGOs. Other affected parties include academics, authors, and publishers. It was not uncommon for both the media outlet and an individual journalist to be targeted in the same legal action. The prominence of media outlets in this dataset can be attributed in part to the fact that several lawsuits have been filed against the same outlets. This suggests a pattern of repeated targeting rather than a higher incidence of unique cases against media outlets.¹⁷

¹⁷ The 2025 Liberties Media Freedoms Report reported that when the investigative platform Correctiv published an article about a meeting of far-right extremists in Potsdam, some of the people present responded to the media's coverage of the event with abusive lawsuits. Ulrich Vosgerau, participant and lawyer, initiated over 40 proceedings, while also launching a fundraising campaign to cover his legal costs.

4. Who is the SLAPP Claimant?

Individual or Organisation

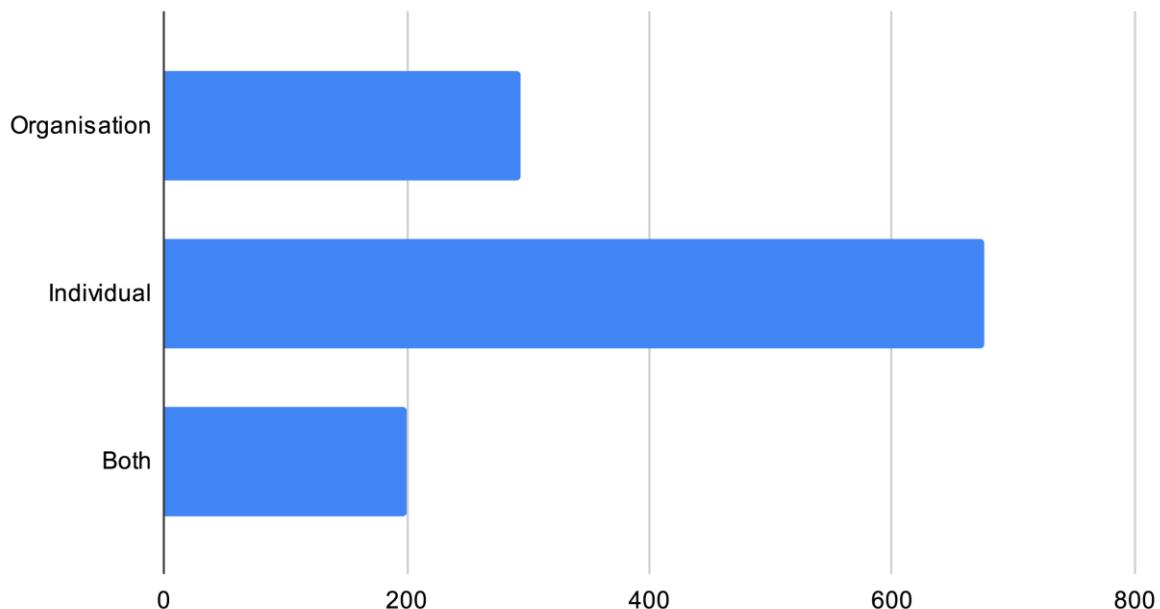


Figure 7: CASE-recorded SLAPP legal cases from 2010 - 2024 - Individual or Organisation

SLAPP actions are overwhelmingly initiated by actors who occupy positions of structural, economic, or political power. Businesses and political figures consistently emerge as the primary litigants, showing how SLAPPs function as tools through which those with resources and influence seek to insulate themselves from public scrutiny.

Political figures and public officials include individuals engaged in the governance of a state or active within a political party. This encompasses a broad spectrum of actors, from current and former MEPs and national parliamentarians to party officials and diplomats.

Those classified under Politicians were generally litigating in a personal capacity rather than representing the government. By contrast, the category of state-owned entities capture institutions or agents acting on behalf of the governmental bodies they serve.

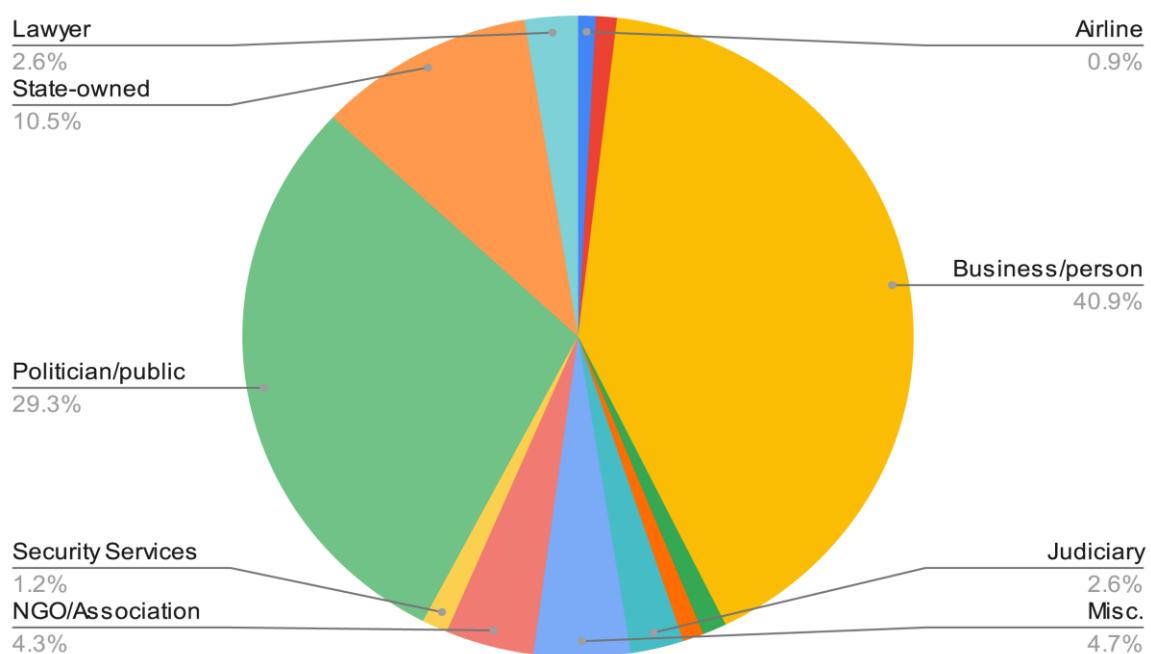


Figure 8: CASE-recorded SLAPP legal cases in 2024 – status of plaintiff

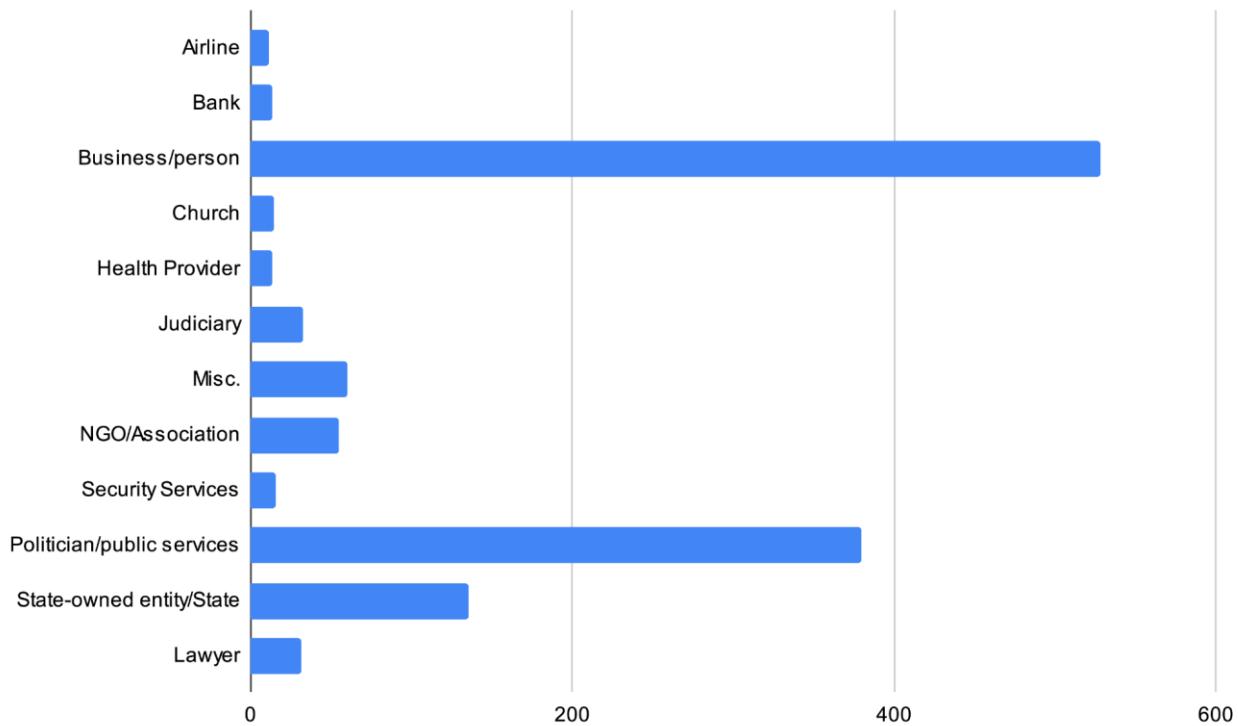


Figure 9: CASE-recorded SLAPP legal cases from 2010 - 2024 - status of plaintiff

5. Issues targeted

Between 2010 and 2024, SLAPP cases reveal clear patterns in the *issues of public participation* most frequently targeted. Allegations of corruption feature prominently, with 283 cases relating to corruption more broadly and a further 45 cases specifically addressing corruption-related claims. Environmental matters constitute another major focal point, with 126 cases demonstrating that activists, watchdogs, and defenders engaged in environmental protection are recurrent targets of strategic litigation. Other public interest issues, including freedom of expression (29 cases) and judicial independence (21 cases), further illustrate how reporting, oversight, and accountability work in the public interest consistently attract legal intimidation.

Issues Targeted 2010-2024

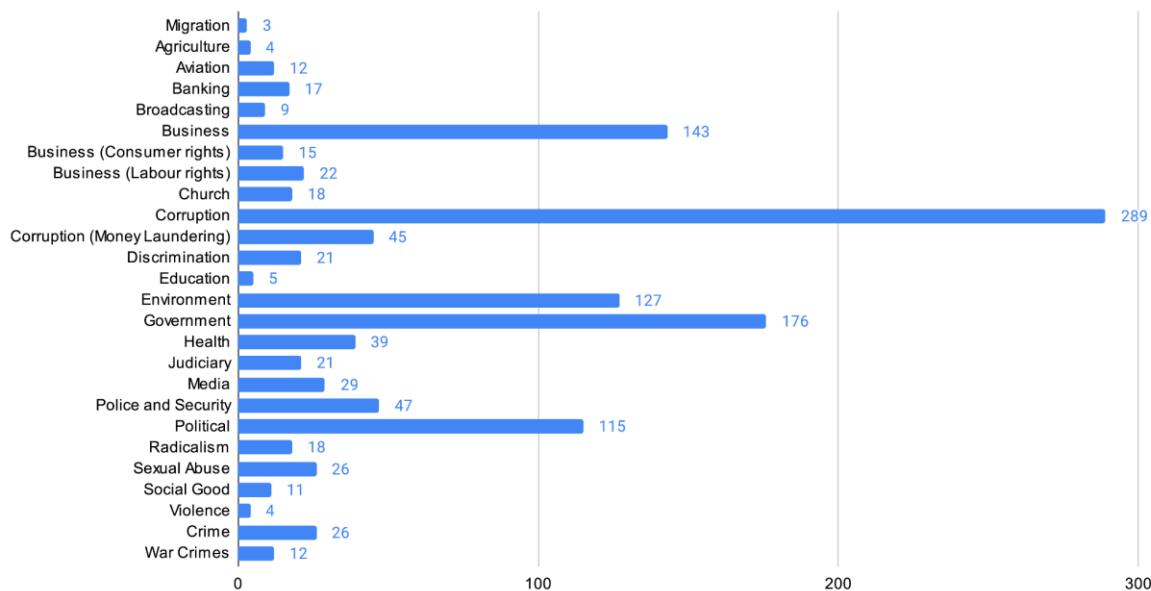


Figure 10: CASE-recorded SLAPP legal cases from 2010 - 2024 - issues

Legal avenues through which SLAPP actions are being pursued

- SLAPPs are increasingly invoking the General Data Protection Regulation (GDPR) and the right to erasure to demand the removal of critical articles and public records. This constitutes a powerful form of censorship because it sidesteps any challenge to the accuracy or lawfulness of the content, instead exploiting the chilling effect of potentially severe GDPR regulatory fines. Such use is disproportionate and abusive, as the GDPR expressly requires a contextual balancing with freedom of expression and the public interest, and was never intended to function as a substitute defamation or reputation management mechanism.¹⁸

¹⁸ See Melinda Rucz, *SLAPPed by the GDPR: protecting public-interest journalism in the face of GDPR-based strategic litigation against public participation*, *Journal of Media Law* 14(2) (2022), shows how SLAPP actors use the GDPR (especially right to erasure) against Forbes Hungary, leveraging data-protection law to demand removal of critical articles rather than directly challenge their truth. Rucz argues that narrow national implementations of the journalist-exemption under GDPR make the law more vulnerable to abuse as a SLAPP tool.

- The CASE data documents 15 cases in which the GDPR was cited as the legal basis, alongside 44 cases invoking privacy breach. This quantitatively confirms that abusers are testing and deploying data protection law as a substitute for defamation, thereby accelerating censorship through the threat of immediate regulatory action. When read together with the report's finding of exorbitant claim demands (reaching up to €45,756,750 in a single case) the resulting financial exposure becomes unbearable, effectively forcing compliance even where the underlying claim is manifestly weak.¹⁹
- The use of copyright infringement claims and digital takedown notices has emerged as another preferred strategy. When a journalist is targeted for alleged copyright infringement over an image or proprietary quote used in an exposé, the legal focus is displaced from the substance and truthfulness of the reporting to the technicalities of usage rights. Such cases qualify as SLAPPs not by virtue of invoking copyright law per se, but where copyright is instrumentalised in bad faith to suppress lawful, public-interest reporting – particularly where the use is incidental, proportionate, or defensible under exceptions such as quotation or reporting. This enables SLAPP filers to silence critical online content – most commonly reporting on corruption (36.1% of 2,024 cases) or business-related issues – without ever having to contest the factual accuracy of the underlying investigation.
- Lawsuits filed under competition law or related business torts are used to silence critics of corporate, environmental, or infrastructure projects. By claiming that an activist's public participation is an unlawful anti-competitive act or is causing "damage to business operations," the claimant can frame the legitimate criticism as a legal wrong. The six documented cases explicitly citing Anti-Competition as the legal basis confirms the emergence of this tactic.

See also a report by TASZ that also documents how powerful actors used GDPR mechanistically to apply deletion requests against press reporting, framing it not as a defamation dispute but as a data-protection issue: https://tasz.hu/wp-content/uploads/2024/04/TASZ_adatvRend_SajtSzab_eng_jav2.pdf

¹⁹ Also, the EDPB (European Data Protection Board) guidance on right to erasure says legal obligations must be interpreted in line with data protection principles and not abused to justify limitations of data subject rights – implying risk of misuse.

Targets

- Victims of sexual abuse are increasingly exposed to strategic litigation designed to silence them, with perpetrators or institutions leveraging civil or criminal claims to intimidate and discredit survivors.²⁰ Such lawsuits exploit the legal process as a tool of harassment, delaying justice, imposing financial and emotional burdens, and deterring others from coming forward. Importantly, the European Court of Human Rights has expanded the concept of public interest under Article 10 to encompass cases involving sexual abuse victims, recognising that reporting and advocacy in this area serve a societal function. In line with this recognition, the report systematically maps cases in which sexual abuse victims have been targeted by SLAPPs.
- Clients posting critical online reviews of private services, including medical or cosmetic clinics, are increasingly targeted through legal threats, injunctions, and takedown demands. For instance, in the UK, *Signature Clinic* has reportedly initiated formal legal proceedings against reviewers to suppress negative feedback, reframing disputes from the merits of the critique to procedural or technical claims.²¹ These practices constitute SLAPPs because they interfere with the exercise of the right to freedom of expression, as protected under Article 10 of the European Convention on Human Rights, on matters of public interest such as consumer protection and transparency in healthcare services. Mapping of such cases is ongoing.

Disproportionate claims

- Damage claims continued to include some exorbitant demands with examples of claims of up to the equivalent of €45,756,750. SLAPP targets continue to face the threat of custodial sentences, despite human rights organisations affirming that imprisonment is never an appropriate penalty for criminal defamation.
- In June 2024, the Italian Minister of Enterprises and Made in Italy, Adolfo Urso, filed a lawsuit against the papers *Il Foglio* and *Il Riformista*, asking for compensation ranging from €250,000 to €500,000.²²

²⁰ <https://www.indexoncensorship.org/wp-content/uploads/2025/10/From-Survivor-to-Defendant-Report.pdf>

²¹ <https://antislapp.uk/2025/04/08/european-slapp-contest-2025/>

²² European Centre for Press and Media Freedom, Minister Adolfo Urso sues *Il Foglio* and *Il Riformista* journalists for defamation, 7 June 2024, Mapping Media Freedom, <https://www.mapmf.org/alert/31863>

- Daniela Santanchè, Minister of Tourism and member of the Fratelli d'Italia party, sued the magazine L'Espresso over an article examining Santanchè's business history. The minister requested €5 million in damages.²³

The Transposition Monitor

CASE and ECPMF have launched the European Anti-SLAPP Monitor, a new online platform designed to track the transposition and implementation of European standards on Strategic Lawsuits Against Public Participation (SLAPPs) at the national level.

This monitoring tool follows the progress of European Union and Council of Europe member states in implementing both the EU Anti-SLAPP Directive 2024/1069 (deadline May 7, 2026) and the Council of Europe Recommendation CM/Rec(2024)2 on SLAPPs with a view to support the development of robust protection against SLAPPs in Europe. Governments and national authorities will determine the appropriate legislative approaches to transpose these instruments, whether through new standalone laws, amendments to existing legislation, or the inclusion of dedicated sections within current legal frameworks. The Monitor will ensure that all such developments are accurately tracked and publicly reported.

The process of monitoring and collecting implementation data is led by ECPMF, CASE members, and a network of national legal experts. In addition, governments and national authorities are being encouraged to contribute information on their efforts to implement anti-SLAPP standards, supporting transparency and accountability in the process.

²³ European Centre for Press and Media Freedom, Minister Santanchè sues L'Espresso for defamation, Mapping Media Freedom, 26 March 2024, <https://www.mapmf.org/alert/31870>

To help the public understand each country's progress, the Monitor uses a clear categorisation system that reflects the status of transposition and implementation efforts. These categories include: **No Information, Not Started, Started, Delayed, Partially Implemented, and Implemented.**

Countries

This chart shows the current progress of transposition in each Member State, the date of the last development and number of known updates.

Member States	Status	Assessment of CASE	Details
 Albania	Not Started	★★★★★	View Report
 Andorra	No Information	★★★★★	View Report
 Armenia	Not Started	★★★★★	View Report
 Austria	Started	★★★★★	View Report
 Azerbaijan	No Information	★★★★★	View Report
 Belgium	Started	★★★★★	View Report

Figure 11: Chart showing current transposition phase in each Member State

A number of jurisdictions **have not yet initiated the process**, including Albania, Armenia, Bosnia and Herzegovina, Georgia, Hungary, Italy, Montenegro, Serbia, and the United Kingdom.

For several states, **no available information** could be identified; these include Andorra, Azerbaijan, Denmark, Finland, Iceland, Kosovo, Latvia, Liechtenstein, Lithuania, Luxembourg, Moldova, Monaco, Norway, Portugal, San Marino, Slovakia, Spain, Switzerland, and Turkey.

A larger group of countries has **commenced** the transposition process to varying degrees. This group comprises Austria, Belgium, Bulgaria, Croatia, Cyprus, the Czech Republic, Estonia, France, Germany, Greece, Ireland, the Netherlands, Poland, Romania, Slovenia, Sweden, and Ukraine.²⁴

²⁴ This process was last monitored in December 2025.

Malta has **partially implemented** anti-SLAPP measures.²⁵ To date, no country has achieved full implementation.

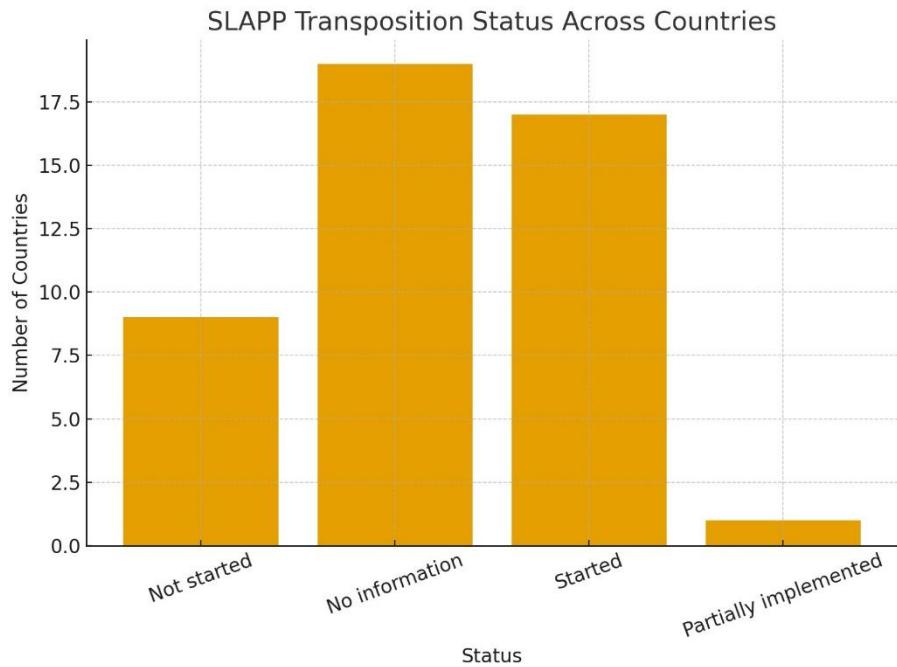


Figure 11: Country report displaying the latest transposition updates.

²⁵ The Maltese parliament transposed the EU directive by publication of legal notice 177 / 2024 in Government Gazette of Malta No. 21,292- 31 July 2024 <https://legislation.mt/eli/ln/2024/177/eng>.

Malta's legislation covers only cross border SLAPPs and does not provide protection against domestic SLAPPs.

Conclusion

The main findings of this report are as follows:

- **Documented SLAPPs reached 1,303 since 2010, with 167 filed in 2024 alone, and the problem is now identified in 43 countries, adding Montenegro and Andorra to the map. The threat has evolved, moving beyond traditional defamation to exploit complex legal areas like data protection and intellectual property. These findings underscore the urgent need for more robust, comprehensive anti-SLAPP protection measures on both national and international levels.**
- **Powerful actors are strategically diversifying their legal claims beyond traditional defamation to exploit procedural complexities and circumvent the public interest defences established for free expression. While the large majority of SLAPPs are based on national defamation laws, the data confirms the rising use of alternative legal vehicles.**
- **The data confirms that the most common litigants are those in positions of power, namely businesses and politicians. The political dimension of the SLAPP threat is growing, with cases initiated or supported by state-aligned entities or powerful foundations common in countries experiencing rule of law backsliding.**
- **This strategy involves the use of SLAPPs to enforce an official historical narrative and restrict debate on historical memory, such as in cases filed against academics, thereby stifling intellectual and political dissent.**
- **The report's total of 1,303 documented SLAPPs is acknowledged to be the "tip of the iceberg." This is because the majority of censorship is achieved at the pre-litigation stage through the use of aggressive legal threat letters and cease-and-desist demands. Furthermore, the threat remains acute because SLAPP targets continue to face the threat of custodial sentences under national criminal defamation laws. This ultimate chilling effect, combined with the fear of retaliation, ensures that many threats or cases never enter the public domain.**

- **The adoption of the EU Anti-SLAPP Directive represents a positive development, providing key protective mechanisms like the early dismissal mechanism and full cost recovery/penalties for abusive claimants.**
- **Only 8.5% of cases filed in the period 2010-2024 were cross-border based on the narrowest definition. This reality underscores the fact that the vast majority of SLAPPs are purely domestic, making robust, mandatory national legislation in every Member State an urgent necessity to close this protective gap. The more extensive application of the definition of cross-border to SLAPP cases may not be so straightforward, and as a result, the percentage of cases covered by the directive may not increase significantly.**
- **Between 2010 and the end of 2024, the most common SLAPP litigants were those in positions of power; namely, businesses and politicians.**
- **Corruption, business-related issues, government action, and the environment remain the topics on which public participation most frequently leads to SLAPPs.**
- **The continued prevalence and sophisticated use of SLAPPs indicate that countries should not underestimate the threat they present to human rights, democracy, and the rule of law. The findings of the CASE Report 2025 strongly support the need to not only fully transpose the EU Directive and the Council of Europe recommendations, but also to repeal or reform national criminal defamation laws which continue to pose the ultimate threat of imprisonment to activists and journalists.**