



Franciscans International
A voice at the United Nations

UNIVERSAL PERIODIC REVIEW CROATIA

Submitted by

Franciscans International (FI)

50th Session of the Working Group on the Universal Periodic Review (UPR)

Human Rights Council

(November 2025)

Geneva

7 April 2025

Introduction

1. Franciscans International (FI)¹ was founded in 1989 and has had General Consultative Status with the ECOSOC since 1995. FI supports Franciscans and partners working at local and national levels all over the world and assists in bringing their concerns and expertise to the United Nations (UN) to address structural causes of human rights violations.
2. Franciscans have been actively involved in the search for peace and reconciliation within and between the countries which made up the former Yugoslavia, establishing the Franciscan Institute for the Culture of Peace², based in Split, in Croatia, back in 1996. Apart from the promotion of peace, the Institute raised social justice and environmental concerns in various campaigns to improve the life of the people in the region. From the 1990s onwards, Franciscans in the country have actively pursued the same themes which FI currently promotes including the dignity of persons, dialogue for peace and care for creation.
3. In a previous UPR submission for Croatia, FI raised issues and made recommendations about the right to health, as regards palliative care to elderly people and also with respect to homelessness. This submission will underscore issues related to the right to a clean, healthy and sustainable environment and the treatment of migrants which have been brought to the attention of FI by Franciscans and their partners working in the country.

I The right to a clean healthy and sustainable environment.

(a) Legal and Institutional Framework

4. On 28 July 2022, the UN General Assembly passed the resolution affirming the right to a clean, healthy and sustainable environment, following recognition in the Human Rights Council the previous year. It was also in July 2021 that Croatia passed its law on waste management. This legislation prescribes inter alia general measures for the purpose of protecting the environment and human health by preventing or reducing the generation of waste, reducing the negative effects of waste generation and waste management, and increasing the recycling and reuse of recycled materials, which is necessary for the transition to a circular economy and ensuring the long-term competitiveness of the Republic of Croatia and the European Union. Article 54 of the statute³ sets out specific waste management related goals:

“Waste management must be carried out in a way that does not endanger people's health and does not cause a harmful impact on the environment, and in particular:

1. does not cause the risk of pollution of the sea, water, soil and air and endangering biological diversity;
2. does not cause discomfort due to noise and

¹ www.franciscansinternational.org

² [The Visit to the Franciscan Institute of the Culture of Peace in Split, Croatia - Frati Francescani \(ofm.org\)](#)

³ [Law on waste management. | FAOLEX](#)

unpleasant odors; 3. does not cause a harmful impact on the landscape or places of special interest; 4. does not cause explosions or fire.”

(b) Comment

5. There have, however, been many breaches of the waste management laws in recent years in Croatia which infringe on the right to a clean, healthy and sustainable environment. There have also been concerns raised about the Croatian authorities’ slowness in dealing with complaints about these infringements and their progress towards improving waste management.
6. The European Environment Agency (EEA) provides a range of statistics by which to judge the efficiency of the Croatian Waste Management program. The starting point is the publication of an “Early Warning Assessment related to the 2025 targets for municipal waste and packaging waste”. This document⁴ assesses the risk of Croatia not meeting its targets for the year 2025 in respect of three categories namely the recycling targets for municipal solid waste; for packaging waste; and the landfill of municipal waste. If a score is not more than 50%, then the country is considered at risk of not meeting its target. The score for recycling municipal solid waste was 34%, 27% for packaging waste, and only 7% for landfill of municipal waste. Overall, the suggestion in the report is that although there has been progress there is still a lot more to be done. This is backed up by the EEA statistics showing that Croatia has improved from a recycling rate of only around 5% to a figure of around 35% in the period from 2010 to 2022.⁵
7. The use or misuse of landfill sites has been and continues to be a source of concern. In the capital city of Zagreb, Total Croatia News reports on 11 May 2023,

“the stomach-turning stench from Zagreb’s Jakusevec site is a clear reminder to Novi Zagreb residents that the somewhat infamous city landfill is still very much in function. The site receives tonnes of municipal waste on a daily basis, but it also seems to be organic waste being dumped there that is causing a particularly vile smell.”⁶

FI received information about similar problems as regard to the landfill site in Rijeka, the main port and third largest city of Croatia. This was identified as one of the eight hot spots – defined as “areas with high pollution levels caused by a prolonged and improper management of industrial (technological) waste” - in the Waste Management Plan of the Republic of Croatia for the period 2023-2028.⁷

8. Another source of information highlighted pollution events at Vrginmost and Osijek⁸ as well as illegal dumping in various sites around Croatia, Ježdovečka forest in the west of

⁴ [European Environment Agency's home page](#) Croatia June 2022

⁵ [Waste recycling in Europe | European Environment Agency's home page](#) see Figure 2.

⁶ [New Zagreb Waste Disposal Rules Failing to Solve Landfill Issues - Total Croatia](#)

⁷ [Stručne podloge za Plan gospodarenja otpadom](#) see page 93.

⁸ [The State Inspectorate must address the pollution scandal in Vrginmost - Zelena Akcija](#)

Zagreb, as well as in Gospić, Pazin, Varaždin, Poznanovec, and Kosnica.⁹ They argue that as long as the system for waste disposal is flawed and inefficient illegal waste operations will continue, with polluters profiting at the expense of public health and the environment.

9. The issue was also raised in the Special Report of the Ombudswoman on The Right to a Healthy Life and Climate Change in the Republic of Croatia¹⁰ which was published in February 2021. It states that,

“Citizens’ complaints submitted to the Ombudswoman reflect their dissatisfaction with the current waste management system and the inadequate protection of the different environmental components, as well as concerns about the effects of pollution on their health.”¹¹

10. Remedial methods in relation to both dealing with a polluted environment and a more ecological and efficient waste management system are possible. In relation to the former, a project to deal with a hotspot, the highly polluted landfill site known as the Sovjak pit, near Rijeka, should be completed by July 2026 with assistance of €4.7 million from the Cohesion Fund as announced on January 30, 2025, on the European Union’s Regional Policy website.¹² In regard to the latter the EEA points to the best practice example of the town of Prelog in northern Croatia, which within 5 years tripled its rate of separately collected waste and established itself as a zero waste best practice example in Croatia and beyond.¹³
11. In regard to illegal dumping activities and the pollution events outlined above, and their impact on the right to a clean healthy and sustainable environment, **we recommend the Government of Croatia to:**
 1. **Ensure that polluters are held to account to deter illegal dumping and/or pollution and implement strict and systematic controls on the handling, transportation and disposal of waste, particularly plastics and hazardous waste.**
 2. **Put into effect good practices of waste management, such as the example of the town of Prelog, accelerate the remedial actions required to remedy pollution hotspots, and take other appropriate measures to ensure the right to a clean, healthy and sustainable environment is respected, protected, and fulfilled for the people of Croatia.**

II Human Rights of Migrants

(a) Legal and Institutional Framework

⁹ [Institutional inertia enables criminal waste activities - Zelena akcija](#)

¹⁰ [Special Report: The Right to A Healthy Life and Climate Change in the Republic of Croatia \(2013-2020\) – Ombudswoman of Croatia](#)

¹¹ Ibid p.25

¹² [Inforegio - EU supports cleanup of polluted pit near Rijeka, Croatia](#)

¹³ [zwe the story of prelog EN.pdf](#)

12. As a member of the European Union (EU), Croatia is a party to the European Union Pact on Migration and Asylum (“the Pact”). The Pact, originally proposed by the European Commission in 2020, was passed by the European Parliament in April 2024, approved by the Council in May 2024 and entered into force on 11 June 2024. It is to commence application on 12 June 2026, with the aim of:

“a comprehensive approach that delivers a common European response to migration. It allows the EU to manage migration in a fair and sustainable way, ensuring solidarity between Member States while also providing certainty and clarity for people arriving in the EU and protecting their fundamental rights.”¹⁴

13. The basis of the Pact is stated to be to show solidarity with the Member States that protect the external borders and with those facing particular migratory pressure, while preventing irregular migration to the European Union. Croatia, as a Member State, will be intimately involved in this new procedure.

(b) Comment

14. In the Third Cycle of Croatia’s UPR there were seventeen recommendations concerning the human rights of migrants. All of the recommendations were simply noted by the Government of Croatia, none was accepted. A substantial part of these recommendations related to the investigation of the alleged “pushback” policy of the Croatian authorities which had been brought up by the Office of the Croatian Ombudswoman in her annual report of 2018.¹⁵ This referred, amongst other incidents, to the death of a 6-year-old migrant, Madina Hussiny, and the difficulty the Ombudswoman had in investigating.
15. Allegations from an NGO¹⁶ and the European Center for Constitutional and Human Rights¹⁷ suggest that such pushback incidents continued in 2023. However, it appears from our sources that the allegations have diminished and that this may be due to increased surveillance cameras which deter border crossings. The present Ombudswoman for Croatia also indicated that she had no ongoing complaints in this respect.
16. FI is concerned however about the apparent reluctance of the Government of Croatia to recognize and respect the human rights of migrants. As noted, Croatia is a member of the European Union and the European Pact on Migration¹⁸ which came into force on 11 June 2024 and is to become applicable within the next two years. The aim of the Pact is to “ensure that the Union has strong and secure external borders, that people's rights are guaranteed, and that no EU country is left alone under pressure.”

¹⁴ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/promoting-our-european-way-life/migration-and-asylum_en#pac

¹⁵ ombudsman.hr/en/download/annual-ombudsman-report-for-2018/?wpdmdl=6777&refresh=67e287e3e79eb1742899171 See pp 293 et seq.

¹⁶ [Croatia: Ongoing, Violent Border Pushbacks | Human Rights Watch](#)

¹⁷ [Microsoft Word - 20230327_Croatia factsheet draft_dr_hh_cg_dr.docx](#)

¹⁸ [Pact on Migration and Asylum - European Commission](#)

17. It is important for a country to underline the guarantee of people's rights, particularly in regard to migrants' rights. The Special Rapporteur for the human rights of migrants has set out in his recent report¹⁹ the positive contributions migrants can make to a receiving country and to foster migrants' contributions in society, the Special Rapporteur recommends amongst other things that Governments commit "to respecting, protecting and fulfilling all human rights in the context of migration".²⁰ We would encourage the Government of Croatia to make this explicit.
18. We would also particularly highlight the restricted access for NGOs to migrant reception and detention centers. The lack of systematic and guaranteed access to these facilities significantly limits independent monitoring, legal aid, and psychosocial support for migrants. It would herald an improvement in relations for such NGOs to be regarded as partners in common work and improve the conditions of asylum seekers and migrants. The Ombudswoman for the Republic of Croatia indicated that she would recommend in her latest annual report to Parliament that the Ministry of the Interior enable a wider range of civil society organizations to work in the reception centers for foreigners.
19. Another important issue is the structure of the Asylum, Migration, and Integration Fund (AMIF)²¹ which has provided over 47 million euros to Croatia for the 2021-2027 period. Instead, however, of acting to assist it is working as a barrier to NGO work. The way AMIF resources are allocated by the Ministry of the Interior discourages civil society organizations from providing essential services. Bureaucratic constraints, delays, and rigid project-based financing prevent NGOs from maintaining stable, long-term support for migrants. Public calls for funding integration and legal aid projects for asylum seekers are exceedingly rare. When they expire, new calls are not launched within a reasonable timeframe, and the requirements set in these calls are often so demanding that very few organizations can meet them.

20. We recommend the Government of Croatia to:

- 1. Take concrete measures to protect the human rights of migrants, according to the international human rights standards, in line with the European Union Pact on Migration and Asylum.**
- 2. Guarantee the NGO access to migration reception and detention centers to ensure that independent monitoring, legal assistance and psychosocial support is provided for the migrants.**
- 3. Restructure the Asylum, Migration and Integration Fund management to assist NGOs in providing stable and long-term support for migrants and asylum seekers.**

¹⁹ [A/HRC/56/54: Revisiting migrants' contributions with a human rights-based approach: a discussion on facilitating and hindering factors - Report of the Special Rapporteur on the human rights of migrants, Gehad Madi | OHCHR](#)

²⁰ Ibid p.20. [Document Viewer](#)

²¹ [Funds for migrant integration in Croatia | European Website on Integration](#)