



sunce

Work Report

January 1, 2025 – December 31, 2025

Pursuant to the Article 45. of the Statute of the Association for Nature, Environment and Sustainable Development Sunce (CLASS: UP/I-230-02/23-0001/0811, UR. NUMBER: 2181/1-12-01/03-24-0005, 09/02/2024), at the session of the Assembly meeting held on April 14, 2026, the annual Work Report of the Association for Nature, Environment and Sustainable Development Sunce for 2025 was adopted.

Work Report

January 1, 2025 – December 31, 2025

Association for Nature, Environment and Sustainable Development Sunce

(Short name: Sunce)

Obala hrvatskog narodnog preporoda 7/III, HR – 21000 Split

YEAR OF FOUNDATION

1998

TOTAL NUMBER OF MEMBERS

498

TOTAL NUMBER OF ACTIVE MEMBERS

39

VISION OF THE ASSOCIATION

Croatia is a country of preserved natural values, the sea and coast, and local communities whose development is based on the principles of sustainability and circular economy.

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1. INTRODUCTION

The protection of the environment and nature cannot be viewed separately from the social context. It is not possible without the active participation of each individual and local communities, as well as mutual cooperation. In 2025, we were faced with an increase in conflicts, further pollution and depletion of natural resources, and deepening polarization in society. We have witnessed circumstances that are devastating to the lives of a large number of people and directly undermine efforts to ensure a clean, healthy and sustainable environment for present and future generations. There are increasing pressures for the deregulation of environmental legislation, both at the European Union and national level. Legislative initiatives are going in the direction of favoring investment interests, while the protection of nature and biodiversity is marginalized. These are processes with potentially serious consequences for the preservation of the environment and natural resources on which we all depend.

Despite this, 2025 was also marked by positive events that are the result of the joint efforts of numerous organizations, including Sunce, and give hope for positive developments. At the Third United Nations Ocean Conference in Nice in June, more than 800 pledges were made for seas and oceans. Furthermore, the High Seas Treaty received the necessary 60 ratifications by UN member states in September 2025. With the adoption of the new Regulation on the Ecological Network, Croatia has designated new marine areas within the ecological network, thus advancing towards meeting the objectives of the EU Biodiversity Strategy for 2030. Sunce actively participated in the designation processes of these new protected areas, including the proclamation of the Special Reserve Cape Stupišće, for which we prepared the expert study in previous years, and which in 2025 became the first strictly protected marine area in Split-Dalmatia County.

We continued to strongly advocate for the priority of reducing waste generation, in particular by encouraging the avoidance of single-use plastics and organizing environmentally responsible events such as the Sustainability Festival, the Bike Tour and the monthly Swap Fairs. These activities have a strong message for citizens because they directly warn of the need to reduce the consumption of natural resources, which is one of the key causes of environmental degradation. The degradation and increase in the amount of litter are particularly visible in the sea. Therefore, marine litter continued to be at the center of our activities, as well as working with different target groups such as fishermen, children, young people and educational workers. This work included education, information and encouraging active engagement in solving the problem of marine litter. Cooperation with citizens and citizens' initiatives is most often achieved through the Green Phone and providing legal support to citizens in exercising their right to a clean, healthy and sustainable environment. It was precisely the strong engagement of citizens during the summer that stopped the overhaul of the Moby Drea ship and the removal of asbestos material in the Split area. Cooperation with national environmental organizations was primarily achieved through the Green Forum network, and one of the successes was the increase in available funding for environmental organizations from the Environmental Protection and Energy Efficiency Fund. A joint advocacy success was also achieved related to the attempt to introduce the institution of "prior verification" in the Proposal for the Regulation on Amendments to the Regulation on Environmental Impact Assessment, which does not exist in the Environmental Protection Act. The prior verification would have allowed the competent authorities to issue an opinion on the need for an environmental impact assessment (EIA), without justification, which could neither be challenged nor appealed. This would allow investors to avoid the obligation to carry out an EIA procedure, which is contrary to the purpose of the Regulation and the intended improvement of EIA procedures.

We expanded our educational activities to the topic of applying nature-based solutions, and the year was also marked by the return of focus on encouraging school volunteering, as well as the establishment of the first outdoor classroom in Split. The positive trend of strengthening relationships and communication with members and volunteers, who offer additional support to Sunce's advocacy efforts, continued. The number

of volunteer hours has increased again (to 4875), as well as the number of members (to 498). Sunce's volunteer club, SoleSTerra, founded at the end of 2024, continued to operate throughout 2025. We continued to involve students through service-learning programs and professional practice, and students contributed to the well-being of the local community through as many as 560 hours of such engagement.

In terms of media coverage, 2025 was a record year for Sunce, with a total of 378 published articles covering our work, viewpoints, topics, activities and projects.

At the organizational level, we have completed the process of harmonization with the new organizational structure and initiated an impact assessment of Sunce's work for the period from 2015 to 2025. As part of this assessment, a study of the perception of Sunce in Dalmatia was also conducted. The survey showed that almost a third of respondents (32%) are familiar with Sunce. Despite the relatively low recognition, the perception of the work of Sunce is extremely positive among those who know about Sunce. The assessment further included the analysis of documents, work reports, strategic plans and other relevant reports/plans/analyses, interviews, questionnaires with 70 stakeholders from different sectors and focus groups with citizens, members and volunteers. The results are expected in 2026 and will form the basis for a new five-year strategic plan. In 2025, we have also achieved the highest income since the founding of Sunce.

The following chapters include an overview of the achievement of strategic objective indicators, an overview of participation in public policies, a list of projects and services, an overview of activities related to organizational objectives and development, and the financial statement of Sunce. A detailed overview of activities and results by departments, as well as individual parts of organizational development, can be found in the extended version of the report for 2025.

We regularly publish information about activities on the official website of Sunce (www.sunce-st.org) and the official Facebook, Instagram and LinkedIn pages, as well as on websites and social networks created as part of individual projects.



Figure 1: Last Assembly of Sunce in 2025, Sunce archive

2. RESULTS BY STRATEGIC OBJECTIVES FOR 2021-2026

2.1. Strategic Objective 1: Contribution to the Establishment of a Sustainable Waste Management System on Land and at Sea

During 2025, Sunce's activities were focused on reducing single-use plastics, improving the waste management system, strengthening the resilience of local communities, connecting public policies, concrete solutions and education, with an emphasis on protected areas as well as the fishing and tourism sectors.

The implementation of the Together without Plastic campaign continued, through which we promoted successful sustainable practices such as the introduction of reusable cups at Advent in Split.

Within the Plastic-Free Croatian Island project, the focus was on further encouraging the implementation of reusable solutions on Dugi Otok. Two decisions have been made to limit the use of single-use plastics in the operations of protected areas, with the Public Institution Telašćica Nature Park making a decision, while the Public Institution Natura Jadra has not yet voted on the decision. Working with public institutions, concessionaires and local stakeholders has enabled the introduction of reusable solutions in everyday business, alongside field monitoring and the collection of feedback. By drafting the document Analysis of the Use of Reusable Cups in the Operations of Concessionaires in Protected Areas of Dugi Otok, the effects and challenges of implementation were further examined, which created the foundations for further improvement and expansion of the Plastic-Free model to other areas.

These activities were followed by the Interreg project WASTEREDUCE – Integrated Waste Reduction Strategies and Solutions in Protected and Natura 2000 Areas, through which the approach to waste reduction in the area of Dugi Otok was further expanded and strengthened. Through a combination of various activities, concrete measures to reduce waste were determined, equipment for the pilot area was procured and additional measures aimed at reducing single-use plastics on Dugi otok were implemented. At the same time, the processes of planning, quality monitoring and communication were improved, while meetings with stakeholders enabled the involvement of the local community and its needs in the development of sustainable solutions.

Throughout 2025, we continued implementing several other Interreg cross-border cooperation projects between Italy and Croatia related to sustainable waste management. In the domain of reducing waste generation and the transition to a circular economy, the focus was on strengthening the knowledge, skills and awareness of different target groups. In the project AWASTER – Adopting WASTE as Resource, special emphasis was placed on the educational sector and business stakeholders, with whom Sunce worked on education, workshops, field activities and creative programs that connect theoretical knowledge with practical application. These activities aimed to promote awareness of waste as a resource, transfer knowledge within the community and develop skills that enable the application of circular solutions in everyday life and business. In this context, communication and educational materials have been developed, including brochures, video content and digital tools.

We continued to work with the fishing sector as part of the project FishNoWaste- Waste Reduction and Management in Fishing Ports of the Adriatic Sea to Promote Sustainable Fisheries. Project activities were focused on the active involvement of fishermen, the fisheries sector, public institutions, young people and educational institutions in addressing marine litter, as well as on the development and testing of functional models of waste management in fishing ports.

Within the project, educational programs for children and young people and trainings for the fishing sector based on the principles of 4R (*reduce, reuse, recycle, rethink*) were implemented, with a strong emphasis on changing the perception of waste in fisheries and recognizing fishermen as key partners in the protection of the marine environment. Public events, field activities and the development of video content have further contributed to the visibility of the project and increased awareness of the challenges associated with marine and passively caught litter. Clean-up actions were also organized within the project, during which the Protocol for Organizing Clean-Up Actions and Simple Monitoring of Marine Litter was used, in order to collect basic data on the types and quantities of waste.

In addition to the above-mentioned clean-up actions, we also carried out detailed monitoring of marine litter at the mouth of the Neretva River beach, which has been carried out for the fourth year in a row (2022 – 2025). The results of the conducted multi-year monitoring from 2021 to 2024 are summarized in the poster Citizen Science: The Role of Citizens in the Quantitative and Qualitative Analysis of Marine Litter, which was presented at the 5th International ZORH Conference. In addition, the White paper Tribunj fishing port is an example of good practice in fisheries waste management, was made. We have participated in relevant professional and public events related to the issue of marine litter, lost and abandoned fishing gear and the management of passively caught waste. As panelists at the international conference Challenges and Solutions in the Fight for a Plastic-Free Sea in Montenegro, we actively contributed to the discussions, sharing experiences from practice and advocating solutions to reduce plastic pollution of the sea.

The transformation of tourism and hospitality sectors towards more sustainable business models began with the international and interterritorial cooperation of the Interreg Euro-MED Programme, within which the LooP Zone project: Promoting a Circular Economy with Low Plastic Zones on Mediterranean Islands is being implemented. At the very beginning of the project, the foundations were laid to reduce the use of single-use plastics in the hospitality industry on the islands, together with initial analyses, coordination of partners and determination of the direction of future activities.

For local self-government units (City of Trogir, Town of Vis, Town of Komiža) and public institutions, we organized public forums on waste management and expert lectures on marine litter for the Town of Kaštela. These activities were focused on educating citizens and the participatory involvement of the community. As part of the service for the Public Institution Brijuni National Park, a cost-benefit analysis on transitioning to a single-use plastic-free island was prepared, with completion expected in 2026.

An important contribution has also been made through the development of tools that enable the practical application of sustainable principles in the wider public space. During 2025, a Manual for Organizing Events Without Single-Use Plastics was developed to support local self-government units, public institutions, event organizers and the civil sector. The Manual offers guidelines, recommendations and examples of good practice for planning and implementing events according to environmentally responsible principles and represents an important step towards the standardization of sustainable events and long-term waste reduction.

The activities carried out during 2025 contributed to strengthening the capacities of local communities and public institutions, developing feasible and transferable solutions, and further positioning Sunce as a relevant strategic stakeholder at the local, national and international levels in the field of environmental protection, waste and single-use plastics reduction, and sustainable resource management.



Figure 2: Photos covering Strategic Objective 1, Sunce archive

(A – Workshop with stakeholders and presentation of the decision on restricting the use of single-use plastics in protected areas of Dugi Otok; B – Workshop for the business sector as part of the AWASTER project; C – participation in the conference AWASTER for a Circular Future: Youth Empowerment and Business Innovation in Portogruaro (Italy); D – Installation of containers for separate waste collection in the fishing port of Tribunj)

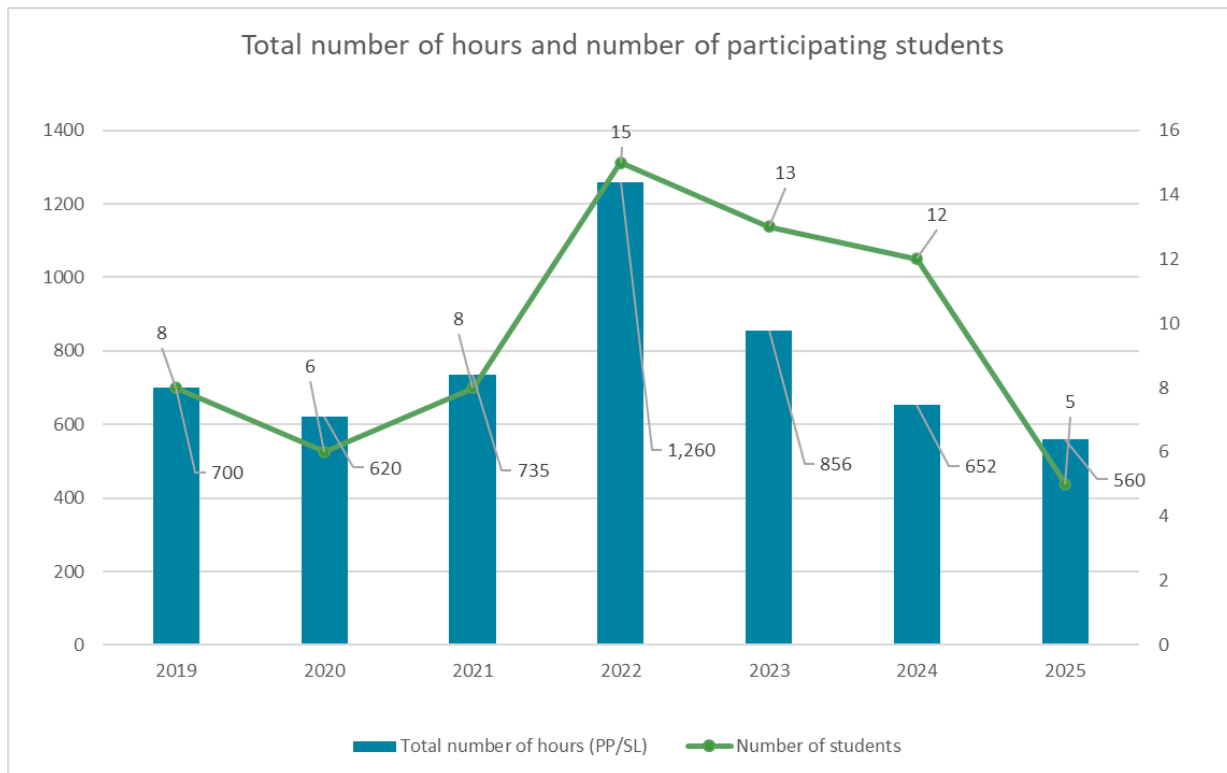
2.2. Strategic Objective 2: Increased Level of Environmentally Responsible Behavior of Wider Public and Target Groups

Throughout 2025, we continued implementing educational programs for preschool and primary school children, students, as well as for representatives of educational institutions. The implementation of the educational program for the educational staff of primary schools in Split-Dalmatia County, VolonTERRA - Active Schools Initiate Changes!, has been completed, as well as the construction of an outdoor classroom in the Elementary School Brda. In addition, the educational program Composting for Educational Workers and Representatives of Civil Society Organizations from Montenegro was implemented.

Within various projects, the following educational programs were designed and implemented: Biodiversity Conservation (Horizon DesirMED, Blato Kindergarten), Sailing into STEM - A Map for 2030, 4R Clean Seas through Removal, Reduction, Reuse and Recycling of Marine Litter (FishNoWaste, EcoLabs) and Circular Economy(AWASTER).

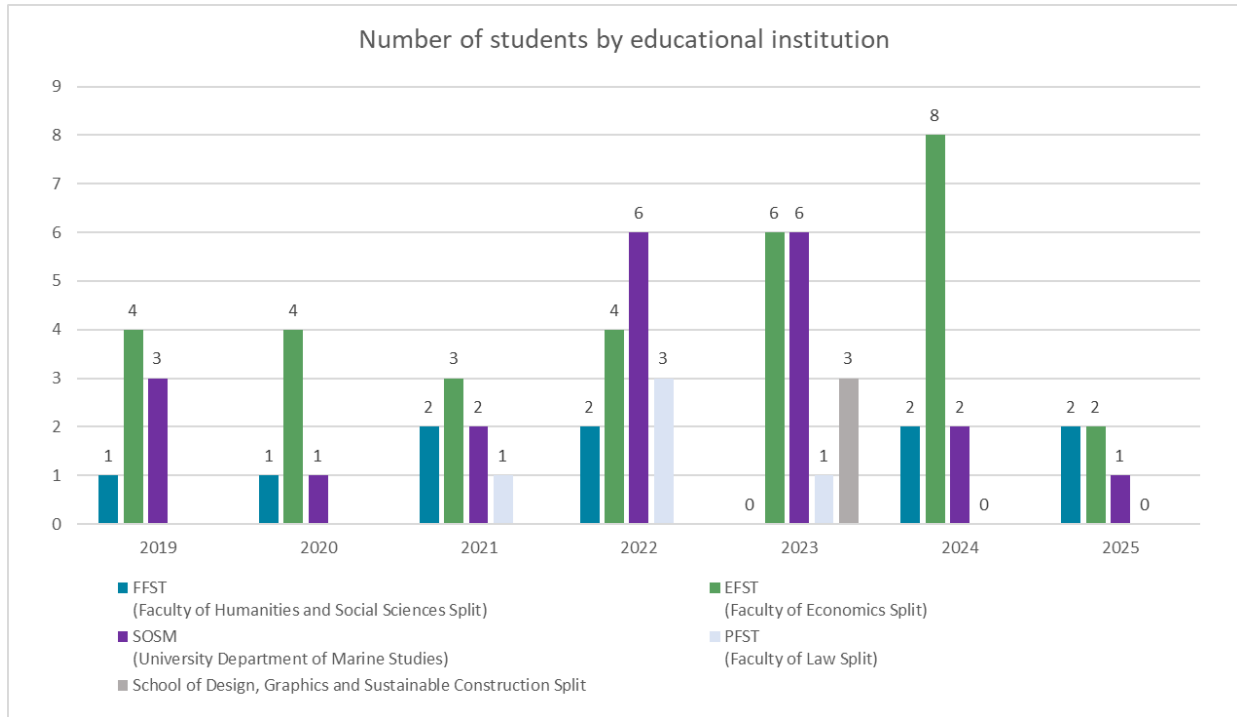
A total of 18 different educational activities were carried out throughout the year for more than 1100 participants, including kindergarten children (kindergartens Popaj and Blato), elementary school students (Brda Elementary School, Dobri Elementary School, Prof. Filip Lukas Elementary School, Blatine Škrabe Elementary School, Skalice Elementary School, Visoka Elementary School), high school students (I. Gymnasium, V. Gymnasium Vladimir Nazor, Health School Split, School of Fine Arts, Craft Technical School, School of Science and Engineering), students (University Department of Marine Studies (SOSM), Faculty of Chemistry and Technology (KTF) and Faculty of Humanities and Social Sciences in Split (FFST)), groups of French and American students, and members of the Scout Seamen Association Poseidon.

Cooperation with Split-based faculties on the implementation of professional practice and service-learning programs for students continued. A total of five students participated (University Department of Marine Studies (SOSM), Faculty of Humanities and Social Sciences (FFST) and Faculty of Economics (EFST), completing 560 hours of engagement.



Graph 1: Overview of the total number of students' hours in service-learning and internship programs and the number of students involved from 2019 to 2025.

Presentations of Sunce as a teaching base for students were held at FFST (March 26, 2025), EFST (October 17, 2025) and SOSM (November 24, 2025). Students were additionally involved in various trainings and workshops as part of the ESF+ project Sailing into STEM – A Map for 2030 (Faculty of Chemistry and Technology (KTF) and Faculty of Humanities and Social Sciences (FFST), the project Swap Fair - Wanna Trade? (Faculty of Science (PMFST)) and the FishNoWaste project (University Department of Marine Studies (SOSM)).



Graph 2: Number of students enrolled by educational institutions from 2019 to 2025

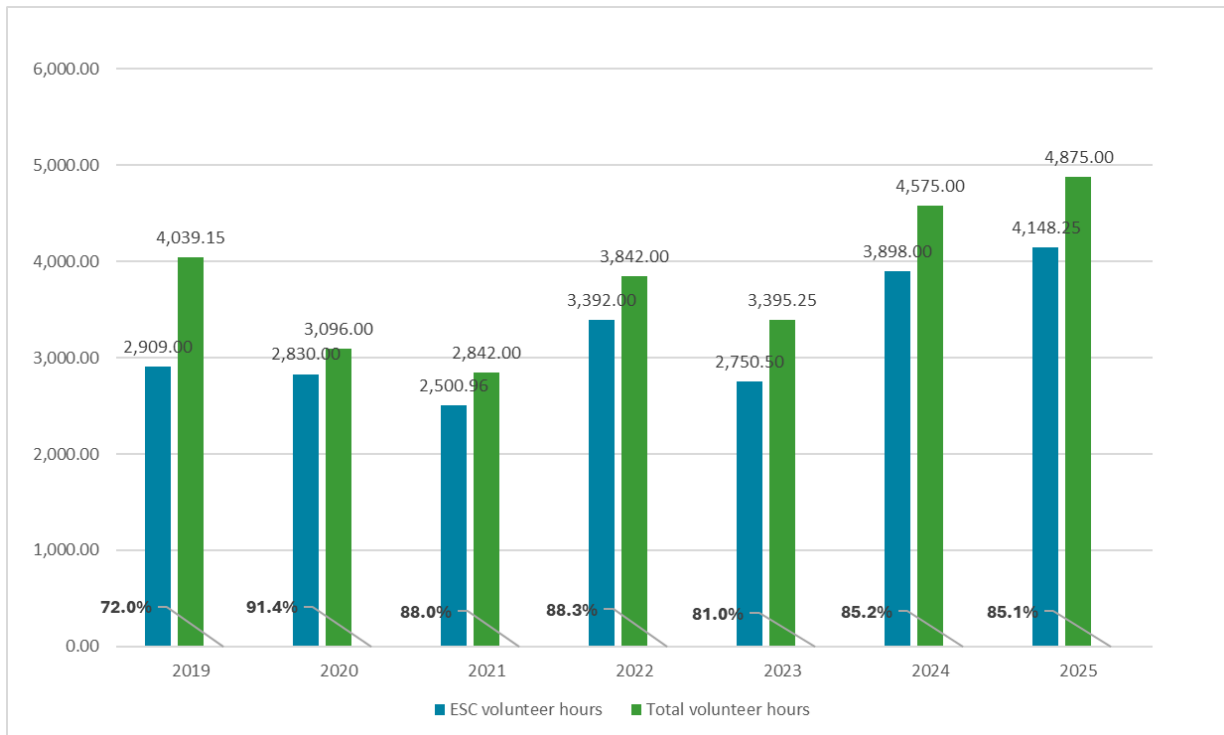
The longitudinal survey of environmental awareness of high school graduates was also completed. In 2025, surveying was finalized, collecting a total of 893 questionnaires. The results are expected to be processed in early 2026.

During 2025, more than 1340 citizens attended our public events. The following public events were organized: ŠIZIKA – Sewing, Patchwork and Creative Activities (11 workshops for a total of 119 participants), Quizzes (4 pub quizzes for 134 participants), Swap Fair (16 fairs for 521 participants), a competition for school garden design on Earth Day (for a total of three schools and 159 students), action Resolution Earth (for 15 participants), Sustainability Festival (200 participants) and 14th Split Bike Tour (250 participants), which traditionally promotes sustainable mobility. All these events, organized in accordance with environmentally responsible principles, encourage active citizenship, change of habits and strengthening citizens' awareness of environmental issues. At events organised by other stakeholders where Sunce participated as an exhibitor or educator, more than 880 participants were reached, including 165 children and young people directly engaged in our activities. The events we participated in were: Raising awareness about waste issues in protected and Natura 2000 areas, the nautical fair Croatia Nautic Show and the associated panel Sailors, Guardians of the Adriatic, panel discussion Youth Inclusion - What Next?, 13th Lučac Buzz ("13. Luški šušur"), Intercultural Evening in the Info Zone, Festival of Dialogue, From Prevention to Inclusion – 30 Years Together, Waste Management Forums and the Split for Children event.

Work with local communities, citizens and the business sector has been further strengthened in projects aimed at sustainable tourism. As part of the Tourism 2030 – Sustainability is My Vibe project, educational

activities, research and public events were implemented to connect the business sector, students and citizens and highlight examples of good practice and visible implementation of sustainable solutions. The implementation of the Dalmatia Green program continued, which contributes to the introduction of environmentally responsible practices in small tourist facilities through certification and work with members.

The total number of international and local volunteers in 2025 was 61, and the total number of volunteer hours was 4875.



Graph 3: Overview of the total number of volunteer hours and volunteer hours related to ESC volunteering from 2019 to 2025

We have also participated in activities aimed at strengthening non-formal education quality, civic engagement, sustainability, and capacity-building of youth work stakeholders. These are activities within the GOOD initiative and the Croatian Youth Network (MMH).

In 2025, Sunce’s communication activities reached record levels, as a direct result of high project intensity and continuous investment in visibility and communication capacity. Ongoing activities, campaigns, a more proactive media outreach approach, and regular press releases contributed to increased media interest in our work.

A total of 378 publications (articles, radio and television guest appearances) were made in the media covering Sunce’s work, positions, topics, and projects. This represents a significant increase compared to 2024 (307) and surpasses the previous record year of 2022. As many as 77% of the posts were related to nine key projects and one advocacy campaign, with the most prominent topics being marine litter, seagrass habitats and the announcement of the Bike Tour.

A total of 145 articles were published on the official website of Sunce, 100 of which have been translated into English.

The total number of users who follow Sunce's work through social networks at the end of 2025 was 16,570, with the official Facebook page having 12,993 (and an additional 143 followers on the ASPEH project's Facebook page), Instagram 2,495, LinkedIn 766 and YouTube 173 followers. Compared to 2024, the number of followers has grown by 945. A total of 989 posts were published on social networks, of which 448 were on the official Facebook page of Sunce, 32 posts were published on the Facebook page of the ASPEH project, 337 on Instagram, and 172 on LinkedIn.

In 2025, we introduced new tools and channels to increase the reach of information. We started actively using Facebook groups for targeted announcements of events, and we implemented QR codes on promotional materials, posters and banners for faster access to information. By upgrading to the paid version of MailerLite, direct communication with users was further professionalised, and the subscriber base increased.

To further enhance access to information supporting environmentally responsible behaviour and business practices, six communication campaigns were implemented in 2025. In addition to the traditional 14. Split Bike Tour, which is still the leading event for the promotion of sustainable mobility, we have implemented the Eco-Dictionary, Sustainable Tourism (MINTS) and Adriatic Treasures (ASPEH) campaigns, as well as campaigns aimed at promoting membership in Sunce and networks in which Sunce actively participates.

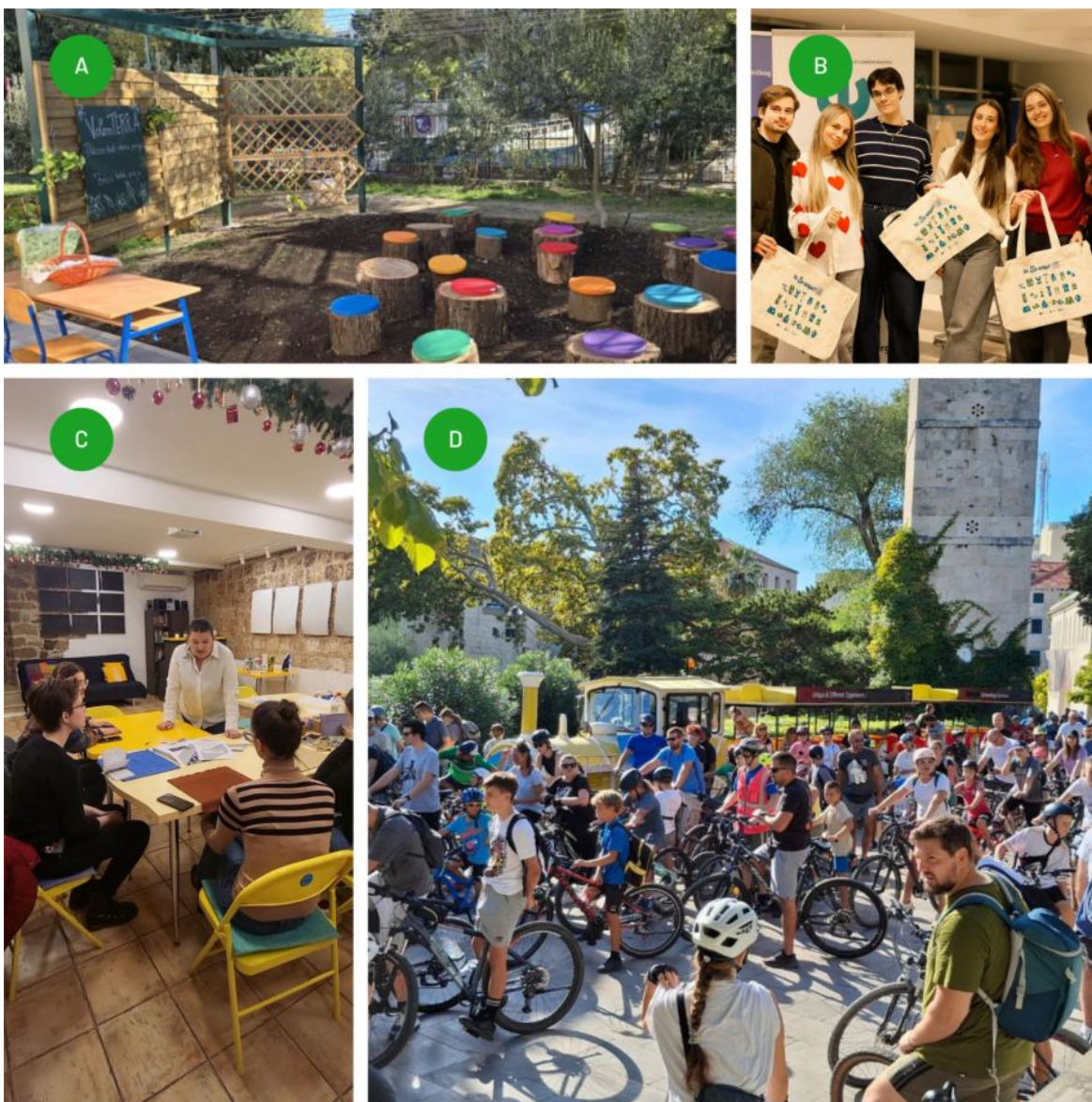


Figure 3: Photos covering Strategic Objective 2, Sunce archive

(A – Outdoor classroom of Brda Elementary School, opened on Nov 6, 2025; B – Swap Fair, Faculty of Science; C – ŠIZIKA, workshop at the Zona Club; D – 14. Split Bike Tour)

2.3. Strategic Objective 3: Increased impact of Sunce on Public Policies and Case Law in the Field of Nature and Environment Protection, and Sustainable Development

In total, we participated in 19 consultation processes directly or indirectly related to the topic of environmental and nature protection, as well as those relevant for the work and financing of civil society organizations (six consultations). In addition to participating in three relevant e-Consultations ("e-Savjetovanja") in the field of nature conservation (Ordinance on Sport and Recreational Fishing, Regulation on the Ecological Network and Act on the Implementation of the Nature Restoration Regulation), we made a special contribution by commenting on the Draft Nature Protection Strategy and Action Plan of the Republic of Croatia 2026 - 2035. Together with the member associations of the Green Forum, we contributed to the VI Report of the Republic of Croatia on the Implementation of the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention), which is prepared every four years, as well as for the Regulation on Amendments to the Regulation on Environmental Impact Assessment. Summaries of the impact assessment of participation in public consultations are provided in Annex 2.5. Public consultations.

We continued to ensure the exchange of knowledge and experience, as well as to influence public policies at the EU level through active membership in the council of the umbrella European organization EEB, participation in online meetings and at the Ocean Week event in Brussels organized by the SeasAtRisk network.

At national and local levels, advocacy for the improvement and better implementation of legislation was also carried out by participating in the work of numerous working groups. An overview of participation and results by individual working groups can be found in Annex 2.5. Working groups.

In 2025, we adopted and published a total of 12 opinions and positions on key environmental issues. These are related to: the shortcomings of the Waste Management Center (WMC) Lećeveca, inefficiency of supervision in protected areas, tree felling in Gundulićeva Street in Split, dangerous practices of waste incineration and the right of citizens to a clean, healthy and sustainable environment. We especially emphasized the position that the planning of large energy plants, such as the Gala-Obrovac Sinjski solar power plant, must primarily focus on brownfield sites instead of greenfield sites in natural areas, which resulted in the temporary suspension of this project.

We have provided support in 11 environmental cases for smaller CSOs and citizen initiatives (MI Association, Zeleni Split, Sv. Martin Association, Lijepa Naša Kaštela). The support included tackling beach litter and tree felling, stopping the processing of vessels with hazardous materials (the Moby Drea case), and providing guidance for analyzing documentation in environmental impact assessment (EIA) procedures.

During the year, we actively participated in two EIA procedures; for the regional Waste Management Centre (WMC) Lećeveca and for the Kozjak solar power plant. For the Strategic Assessment of the Waste Management Plan of the Split-Dalmatia County, we sent an official remark on the shortcomings of the document, which is a result of an extremely poor Waste Management Plan of Split-Dalmatia County, for

which we also participated in the public consultation. As far as strategic litigation is concerned, 2025 brought a disappointing outcome for the Dugi Rat case. The Commercial Court in Split rejected the claim for the protection of collective interests and the right of citizens to a clean, healthy and sustainable environment. Although the community was left without legal confirmation of the request for the remediation of the "black hill", Sunce continuously highlighted this process publicly in order to keep the topic in public discourse. No new lawsuits have been filed this year. Furthermore, in August 2025, our representatives were included in the Working Group for the Drafting of the Environmental Protection Act, within which we will advocate for necessary legislative changes and for enabling the protection of collective interests and citizens' rights to a clean, healthy and sustainable environment.

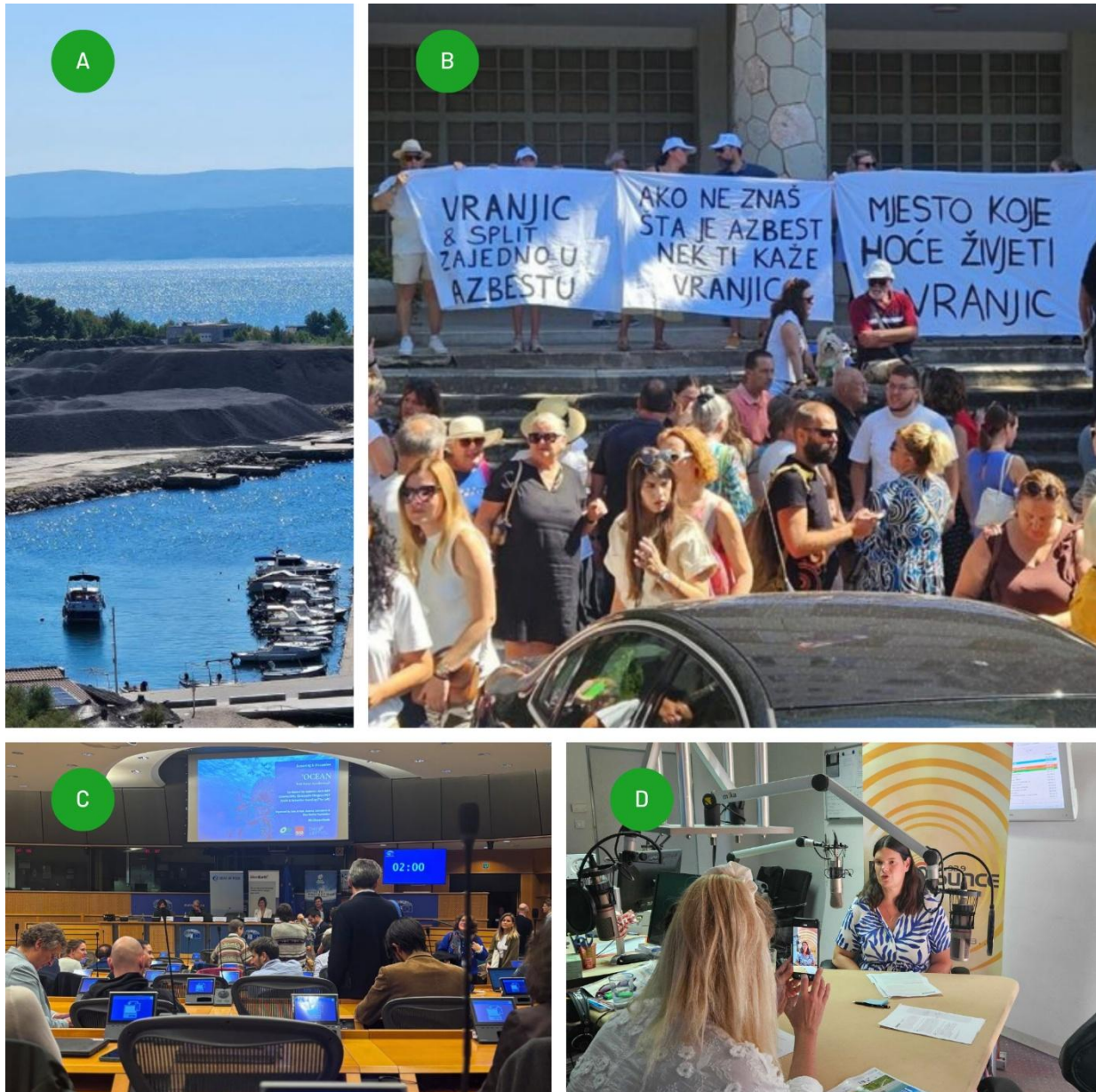


Figure 4: Photos covering Strategic Objective 3, Sunce archive

(A - The "black hill" site in Dugi Rat, for which Sunce's class action lawsuit was rejected in July; B - Protest against the arrival of the ship Moby Drea at the Split shipyard and the transfer of asbestos panels to Croatia; C - Participation in Ocean Week 2025 in the European Parliament as a member of the Seas At Risk network; D - Guest appearance on Radio Sunce in the show Sunčana frekvencija, financed as part of the DesirMED project, and a conversation about the campaign And Where Do You Anchor ("A di se ti sidriš?")

2.4. Strategic Objective 4: Contribution to Increasing the Efficiency of Nature Protection Sector with a Focus on Marine Ecosystems Conservation

In 2025, Sunce continued and further intensified its work on strengthening the efficiency of the nature protection system, with a special emphasis on the preservation of marine and coastal ecosystems, the implementation of nature restoration measures and the reduction of the negative impacts of human activities on the sea. A special focus was on connecting scientific data, advocacy and implementation on the ground, as well as on strengthening cross-sectoral cooperation in the field of spatial planning, fisheries, maritime affairs and nature protection.

A particularly important step forward was achieved with the adoption of the Regulation on the Ecological Network, which designated new marine areas of the ecological network and made significant progress towards meeting the goals of the EU Biodiversity Strategy for 2030. This move increased the share of protected land to 36.8% and the share of seas to 32.4% of the territory under national jurisdiction. The ecological network includes new large areas important for the conservation of bottlenose dolphins (*Tursiops truncatus*), loggerhead turtles (*Caretta caretta*), Yelkouan shearwaters (*Puffinus yelkouan*) and Scopoli's shearwaters (*Calonectris diomedea*), as well as additional areas important for the conservation of Posidonia meadows (*Posidonia oceanica*). It is particularly important that this Regulation, for the first time, declares areas important for seabirds at sea, based on expert proposals developed within our project LIFE Artina – Seabird Conservation Network in the Adriatic. Although the Regulation does not cover all the areas proposed by the project, Sunce continued to advocate for their inclusion and the continuation of the process towards comprehensive protection in the public consultation. New areas for the conservation of Posidonia were designated based on the results of the national mapping of marine habitats in which we participated for many years.

We actively participated in the designation of new protected areas, including the Proclamation of the Special Reserve Cape Stupišće, for which we have prepared the expert study in previous years, and which in 2025 became the first strictly protected marine area in Split-Dalmatia County. We also completed the preparation of an expert study for the purpose of developing an expert basis for the extension of protection of the Pakleni Islands to adjacent marine areas. In these activities, we intensively collaborated with the Public Institution Sea and Karst ("*More i krš*"). Also, we participated in the Working Group for the Development of Proposals for the Amendment and Expansion of Strictly Protected Zones in the Telašćica Nature Park.

At the same time, we worked on advocating for strengthening the effectiveness of surveillance in protected areas. Thus, based on the results of the project EFFICIENTN2K – Strengthening Institutional Collaboration on Surveillance and Enforcement in Coastal and Marine Natura 2000 Sites, completed in 2024, we developed and promoted our position on the state of surveillance in Croatia and recommendations for its improvement among institutions and the public.

We advocated for increasing strictly protected marine areas and improving the effectiveness of surveillance by actively participating in national and local processes for the adoption of strategic and regulatory documents (e-Consultations), formal and informal working groups and meetings, including for the Draft Nature Protection Strategy and Action Plan of the Republic of Croatia 2026 - 2035, the Nature Protection Act, the Regulation on the Ecological Network and documents related to the implementation of the Nature Restoration Regulation.

A significant contribution was also made through the development of management documents for protected areas and areas of the ecological network. By the end of the year, the Management Plan for the Special Forest Vegetation Lokrum Island and the Ecological Network Area HR400017 Lokrum was adopted, which we developed in previous years with the competent public institution. We participated in the

development of six conservation plans for the Natura 2000 target species and habitats within the ASPEH project pilot area, including Posidonia meadows and marine caves.

In regard to increasing the area of marine and coastal protected areas and strict protection zones, we had a strong advocacy and public role. Campaign *And Where Do You Anchor? ("A di se ti sidriš?")* continued for the second year in a row, with a strong connection to the topic of the effectiveness of protection and conservation of Posidonia meadows. Through public events, media appearances and extensive communication on social networks, the topic of responsible anchoring and protection of marine habitats has reached the general public. In addition, within the ASPEH project, the *Adriatic Treasures* campaign was launched, which promoted the values of marine and coastal biodiversity with the help of creative formats (photo contest, pub quiz), educational activities and audiovisual materials.

As part of public and communication activities, we organized public events on Hvar and Korčula, with the aim of promoting the preservation of Posidonia. In collaboration with a local artist, a light (audiovisual) projection dedicated to Posidonia was created. An artificial intelligence tool was used in the creation of video content, which tested new approaches to communication on marine protection. The events provoked an extremely positive response from citizens, with a strong interest in additional information and active participation of the audience. During the event, a large amount of promotional and informational materials on Posidonia conservation and proper anchoring were distributed, further strengthening the campaign message among locals and visitors.

We have covered the topic in more than 20 articles and over 150 posts on social networks, resulting in more than 60 appearances in the media. Promotional materials on the conservation of Posidonia, loggerhead turtles, marine caves and other habitats and species of the Adriatic were made and distributed (reusable bottles, fans, T-shirts, waterproof bags, coasters, magnets, stickers, pages and magnets), as well as a leaflet with instructions on how to reduce the impact of anchoring on Posidonia.

A particularly important part of the work was related to monitoring the condition of the seagrass Posidonia and understanding the pressures on it. Sunce carried out field monitoring of Posidonia in the Kornati National Park, Mljet National Park and the area of the ecological network HR3000166, the North coast from Cape Pusta in Sobra Bay to Cape Stoba near Okuklje Bay with islands and waters, Telašćica Nature Park and in the area of the ecological network HR4000007 Badija and the islands around Korčula. In addition to traditional field methods, an important step forward has been made in monitoring anchoring pressures through satellite monitoring of vessels, covering approximately 210 km² of marine area and analysing more than 130,000 detected vessels. The obtained data were used as an expert basis for advocating for more efficient anchoring regulation and were presented at national and international professional events, including the meeting of the national Working Group for the Conservation of the Seagrass *Posidonia oceanica* in the Adriatic Sea, of which we are a member. Representatives of Sunce also participated in field activities of monitoring anchoring scars in Posidonia meadows in the area of Badija and Kornati, which further improved the understanding of the real consequences of anchoring on the condition of the habitat.

In 2025, Sunce further strengthened the capacities of the nature conservation sector by organizing education, trainings and professional events. A cross-border training on *Strengthening Capacities for the Implementation of Habitat Conservation Measures on Vis* was organized, as well as specialized training for monitoring Posidonia meadows, including both theoretical and field components. Sunce organized or co-organized several national and international workshops and conferences focused on managing the pressures of nautical tourism, the role of spatial planning and zoning, and the implementation of conservation measures, which directly contributed to the strengthening of implementation capacities and cross-sectoral cooperation. We particularly highlight two events that we organized in Split involving representatives from different sectors: *Management of Nautical Tourism Pressures on Key Coastal and Marine Habitats - Role of Spatial Planning and Zoning* (Sept 29 - 30, 2025) and *Cross-Border Workshop to Present the Conservation Plans to the Main Stakeholder* (Mar 27, 2025).

At the same time, our representatives actively participated in seven events organized by other national and international institutions as lecturers, panelists or exhibitors, while passive participation was recorded at

an additional fifteen relevant events, with the aim of following trends, exchanging experiences and further improving professional knowledge.

Influencing policymaking and advocating for more effective marine protection measures and knowledge exchange has also been achieved through continuous participation in national and international networks, especially in the Mediterranean Posidonia Network, Seas at Risk and BioNET. We also became a member of the MedReAct - Mediterranean Recovery Action network.

Despite significant progress, Sunce continues to advocate for the fulfilment of the remaining key commitments, in particular the designation of at least 10% of the sea surface under strict protection, as well as the establishment of effective legal mechanisms and controls that will enable the effective implementation of conservation measures and the achievement of a favourable status of marine species and habitats in the Adriatic.



Figure 5: Photos covering Strategic Objective 4, Sunce archive

(A - marine habitats training on Vis as part of the ASPEH project; B - the proclamation of the first strictly protected marine area in the SDC, the Special Reserve Cape Stupišće, for which Sunce prepared the expert study; C - two-day event within the BIOPRESSADRIA project, Management of Nautical Tourism Pressures on Key

Coastal and Marine Habitats; D – light projection about Posidonia on Hvar, made as part of the BIOPRESSADRIA project and the advocacy campaign And Where Do You Anchor?

2.5. Annex: List of Participation in Public Policymaking

Public Consultations

Participation in public consultations and working groups, media advocacy and promotion of opinions to target groups and the general public is an important segment of our activity and runs through **all four goals of the Strategic Plan**. In doing so, we are focused on policies related to the protection of the environment, nature, sustainable development, but also those on policies that can affect the work and activities of civil society organizations.

In 2025, there were no improvements to the e-Consultations portal in terms of its transparency or use. Public authorities continue to provide unclear explanations on the acceptance, partial acceptance or non-acceptance of certain comments, and the superficial justification "noted" is often used. It remains difficult to track the impact of our contributions, as final versions of documents undergoing consultation are not published. Furthermore, despite the disapproval of the public and experts, laws that can have a harmful impact on the environment are often adopted, an example being the Physical Planning Act.

Consultations at the local level continued to be conducted via the websites of the competent institutions, such as the consultation for the Draft Proposal of the Waste Management Plan of Split-Dalmatia County (WMP SDC) for the period 2024 – 2029, and the Strategic Environmental Impact Assessment (SEA) of the same plan, conducted by the County, as well as the consultation of the City of Split for the Decision on the Allocation of Business Premises for Use by a Civil Society Organization. However, the way these consultations are organized indicates a lack of understanding of the role and importance of public participation, suggesting that such processes are carried out merely pro forma. Namely, the supporting documentation, as well as information on the public consultation for WMP SDC and SEA WMP SDC are poorly organized on the County's website. Finding this information was very difficult for citizens and the interested public. Furthermore, during the consultation for the above-mentioned Decision of the City of Split, almost all the comments made, both by Sunce and other involved associations, were not accepted. It is particularly frustrating that, despite the considerable effort invested by Sunce and other civil society organizations, the public call for city premises launched in May 2025 had still not been finalized at the time of drafting this report. Participating organizations also largely agree that there were inconsistencies in the scoring criteria applied.

Nevertheless, we continued to analyze the impact of our participation in individual public debates, and the results of selected cases are listed below in the document.

Through participation in the work of individual working groups and bodies, some progress has been noticed. Although only one meeting was held through the working group for the preparation of the VI Report for the Aarhus Convention, almost all comments from Sunce and the members of the Green Forum were included. This report is produced every four years by the signatory states, and it provides an insight into the implementation of the three pillars of the Convention: access to information, public participation and access to justice in environmental matters. Although during the public consultation we also sent a substantiated comment on the ineffectiveness of access to justice in environmental matters in the Republic of Croatia, in the end the comment was not included in the Report. Overall, the functioning of most working groups remains unsatisfactory. Cosmetic changes to documents are often accepted, while substantive proposals are ignored. Furthermore, working group meetings are held irregularly, if at all. Working groups often do not have rules of procedure, and if they are adopted, they are often not respected. Particularly problematic is the lack of respect for the time for the contribution of the members of the working group and the failure to plan the workflow of activities. Thus, meetings for national working groups are most often held in Zagreb, and the working material is sent only a few days before or even immediately before the meetings. Furthermore, the procedures for nomination and selection of members of working groups are not clear. All of this points to a continued lack of understanding of the importance of participatory processes in early-stage consultations.

Below is an overview of the consultations and summaries of our impact assessment for those consultations for which it was possible to do so.

Strategic Objective 1

- **Draft Proposal for Amendments to the Waste Management Plan of the Republic of Croatia for the period 2023 – 2028**

From April 30 to May 15, 2025, the Ministry of Environmental Protection and Green Transition conducted a public consultation for amendments to the Waste Management Plan of the Republic of Croatia for the period 2023 – 2028. The consultation was conducted through the e-Consultations platform and we sent a comment related to the removal of the former ferroalloy factory Dalmacija, Dugi Rat from the list of locations requiring remediation. Namely, this location was listed in the Waste Management Strategy from 2005. In its response, the Ministry pointed out that "no waste was disposed of at the Dugi Rat site, and therefore the remediation of that location does not include the removal of waste and for this reason it is not included in the Waste Management Plan of the Republic of Croatia." The fact is that the investor, as the owner of the waste, upon the adoption of the Remediation Plan, on the basis of the conducted expert opinions, categorized slag as a raw mineral. However, after two decades, remediation has still not begun at the location. On the other hand, the locals are faced with an increase in respiratory and malignant diseases and daily pollution of the air, sea and soil.

- **Draft proposal of the Waste Management Plan of Split-Dalmatia County (WMP SDC) for the period from 2024 – 2029**

Split-Dalmatia County conducted a public consultation from November 20 to December 20, 2025 via the County's website, along with a public presentation. We submitted numerous comments, highlighting that the proposed Plan does not offer solutions to existing problems, does not introduce concrete measures, and does not ensure the implementation of legislation, while waste quantities are increasing and

environmental and health risks are growing. Furthermore, the accompanying documentation, as well as information on the public consultation for WMP SDC and SEA WMP SDC are poorly organized on the County's website. Finding this information was very difficult and anything but easily accessible to citizens and the interested public. Our comments were published by media and we were invited to a meeting with the County. The consultation report has not yet been published and the impact analysis will be presented in the next Work Report.

- **Strategic Environmental Impact Assessment of the Draft Proposal for the Waste Management Plan of Split-Dalmatia County (SEA WMP SDC) for the period from 2024 – 2029**

Simultaneously with the implementation of the public consultation for the Draft Proposal for the Waste Management Plan of Split-Dalmatia County for the period from 2024 to 2029, from November 20 to December 20, 2025, Split-Dalmatia County conducted a public consultation for the strategic environmental impact assessment of the same Plan. The public consultation was conducted through the County's website and a public presentation was also held. Given the conclusion that this is a flawed document of the Draft Proposal for the Waste Management Plan of Split-Dalmatia County, we have not commented on the strategic assessment. However, we drew the attention of the developer to the positive impact of composting and composting on the soil, which was not highlighted in the strategic assessment document. Namely, the application of circular economy in the treatment of biowaste and the creation of the end product, humus, can contribute to the enrichment of the already impoverished soil in the County, including on the islands. The consultation report has not yet been published and the impact analysis will be presented in the next Work Report.

Strategic Objective 2

- **Draft of key elements of the Public Call for Proposals for the Civil Society Programme of the second Swiss contribution for "Support to the Development of Partnerships between Civil Society Organisations and Higher Education Institutions for Implementation of Service Learning Programmes" Croatian-Swiss Cooperation Programme**

Through the e-Consultations platform, the Office for Cooperation with NGOs of the Government of the Republic of Croatia conducted a public consultation from April 25 to May 26, 2025 on the Draft of Key Elements of the Public Call for Proposals for the Civil Society Programme of the Second Swiss Contribution for "Support to the Development of Partnerships of Civil Society Organizations and Higher Education Institutions for the Implementation of Service Learning Programmes". Previously, in February 2025, we participated in a questionnaire for compiling the call via Google Form, which was sent to us by the Office for Cooperation with NGOs. We submitted the comments independently. The accepted comments referred to the amendments related to the chapter "purpose of the call" (citing the University of Split and the University of Rijeka as examples of universities that have established an Office for Service-Learning, along with the University of Zagreb, emphasizing teamwork as an important segment of service-learning). Furthermore, we proposed a clearer definition of a specific objective, which included: the introduction of the number of CSO employees/volunteers trained to implement service-learning as a mandatory indicator and the postponement of the announcement of the tender for the autumn, in order to enable successful project preparation due to limiting summer conditions. These proposals were accepted.

- **Draft of Key Elements of the Public Call for Proposals for the Civil Society Programme of the Second Swiss contribution for "Support to the Volunteering Organisers for the Improvement of**

Volunteer Management and the Implementation of Volunteer Programs" Swiss-Croatian Cooperation Programme

In March 2025, we participated in a questionnaire for drafting the call via Google Form, which was sent to us by the Office for Cooperation with NGOs. Some of our suggestions and comments related to the importance of securing funding for volunteer coordinators and the importance of strengthening volunteer motivation sent through a questionnaire were included in the public call. From September 2 to October 2, 2025, the Office for Cooperation with NGOs of the Government of the Republic of Croatia conducted a public consultation via the e-Consultations platform. Due to a lack of time caused by working on other priorities, we did not participate in the e-Consultations. The opportunity to advocate for the extension of the mandatory partnership to public institutions for protected areas has been missed, as was the case in the previous ESF call focused on volunteering. Ultimately, due to the lack of capacity and the restriction of partnerships to educational, social and public health institutions, we did not participate in the call.

Strategic Objective 3

- **Ombudswoman's report for 2024**

At the invitation of the Ombudswoman at the very beginning of 2025, we submitted data for preparing the Ombudswoman's report for 2024. In our contribution, we highlighted the current violations of the right of access to information, the right to public participation and the right of access to justice, including the dispute for the protection of collective interests in the Dugi Rat case. Special emphasis was placed on ineffective information in EIA/Assessment of need for EIA procedures, which represents a violation of the fundamental principles of environmental protection, precaution and prevention. We further highlighted the weaknesses in the nature protection system, including the lack of coordination, the limited capacities of the competent authorities and the inconsistent judicial practice, as identified through the analysis within the EFFICIENTN2K project. We also highlighted the administrative, financial and legal difficulties that civil society organizations face in their work, threats and pressures that limit their effectiveness, and the failure to adopt the National Strategy for the Creation of an Enabling Environment for the Civil Society Development from 2024 to 2030.

- **Contribution to the 2025 Rule of Law Report**

In cooperation with the Miko Tripalo Centre, we contributed to the Rule of Law Report for 2025, with a focus on the quality of the judiciary and the real accessibility of courts in environmental cases. In particular, we highlighted the financial and procedural obstacles faced by civil society organizations, as well as the limited effectiveness of judicial protection in practice. At the same time, we pointed out the problems of access to environmental information and public participation in decision-making processes. The contribution is based on concrete experiences from practice, including the collective lawsuit in the Dugi Rat case as an example of strategic protection of citizens' right to a clean, healthy and sustainable environment.

- **VI Report of the Republic of Croatia on the Implementation of the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention)**

Through the e-Consultations portal, the Ministry of Environmental Protection and Green Transition conducted a public consultation for the VI Report of the Republic of Croatia on the Implementation of the Aarhus Convention from May 8 to June 8, 2025. Although we participated in the working group for the drafting of the Report as a substitute representative on behalf of the Green Forum, we also submitted

comments during the public consultation on behalf of the Green Forum. One comment referred to the work of the working group, which held only one meeting and, moreover, the draft report was not delivered to its members before its publication on the e-Consultations portal. However, almost all of the Green Forum's comments, which are mostly focused on real problems related to the implementation of legislation relevant to the implementation of the Aarhus Convention, and which environmental associations encounter in their daily work, are included in the document. During the public consultation, we also sent additional comments related to the work of inspection services, which often do not inform about the measures taken and the results of the inspection. We also commented on the problems related to registers, databases and portals in the field of environmental protection, which are often not available in real time, are not adapted for easy use, often have generalized data, and it is not possible to obtain data on specific pollution. Shortcomings in the work of numerous working groups at the local and national level were also highlighted. These comments were also included in the Report. Remarks related to non-compliance with the information provisions in the Ordinance on Packaging and Waste Packaging, Single-Use Plastic Products and Fishing Gear, the lack of action of port authorities on the issue of sea pollution, the low efficiency of CSOs' actions in litigation and the ineffectiveness of access to justice in environmental matters in the Republic of Croatia are not included in the Report.

- **Proposal for the Regulation on Amendments to the Regulation on Environmental Impact Assessment**

Through the e-Consultations portal, the Ministry of Environmental Protection and Green Transition conducted a public consultation for the Regulation from May 8 to June 8, 2025. During the consultation, we supported the comments of the Green Forum, which were drafted by representatives of the Green Forum participating in the work of the working group for this Regulation (Željka Leljak Gracin from Zelena akcija (*Green Action*), Irena Burba from Zelena Istra (*Green Istria*), and Ivana Selanec from the Biom Association). In addition to the objections to the work of the working group, the key comment of the Green Forum was the attempt to introduce the institute of "prior verification", which does not exist in the Environmental Protection Act, and which, according to the consultation report, was rejected as a proposal. The Government of the Republic of Croatia has not yet adopted the disputed Regulation and it remains to wait for its adoption to confirm its final version and assess the effect of participation.

- **Proposal for the Physical Planning Act**

Through the e-Consultations portal, the Ministry of Physical Planning, Construction and State Assets conducted a public consultation on the Proposal for the Act from September 4 to October 4, 2025. Sunce, with the support of the law firm of Ivana Krstulović, prepared comments that were also submitted on behalf of the Green Forum. The main proposal, to enable the public to actively participate at an earlier stage in procedures for interventions that require an environmental impact assessment, was not accepted. The Ministry believes that public participation is already sufficiently ensured through environmental and nature protection procedures, although in practice this is unfortunately not the case. Although Sunce made a number of proposals, most of them were not accepted or were only acknowledged without a concrete change in the legal text. The accepted changes include the obligation to publish the Ministry's opinion on the website, a clearly defined duration of public inspection, the mandatory approval of the Ministry and public consultation for urban projects, compliance with deadlines in environmental protection procedures, mandatory approval for key spatial plans, enhanced supervision over their development and the introduction of planning for permeable surfaces in construction areas.

Strategic Objective 4

- **Consultation on the Proposal for a Regulation on Amendments to the Regulation on the Ecological Network and the Responsibilities of Public Institutions Managing Ecological Network Areas**

The comment related to the technical part of the public consultation was accepted, while three substantive comments were not accepted, i.e. one was taken into account.

Based on Sunce's remark that spatial data on the location of new areas of the ecological network were not made available to the public during the consultation, the e-Consultations were extended for an additional eight days, during which the proposed areas became visible on the Bioportal, as Sunce proposed. As project partners of the LIFE Artina project, we supported the comment of the Biom Association: "As part of the LIFE Artina project, during three years of research (2019 - 2021), data were collected on the distribution of endangered seabirds - Yelkouan shearwaters, Scopoli's shearwaters and the Mediterranean gull - at sea, along the coast and in their colonies within the project area. The research included a variety of methods, including census of seabird colonies, counting individuals along sea tracks, and telemetry via radio and GPS tracking. GPS tracking was carried out on 40 Yelkouan shearwaters, 40 Scopoli's shearwaters and 25 Mediterranean gulls during the chick-rearing period. The results of the research led to the designation of five new marine IBAs (Important Bird Areas) and the expansion of the two existing IBAs. The new sea IBA - the Lastovo Channel, the Korčula Channel, the Hvar Channel, the East Mljet Channel and the North Adriatic - are key feeding and resting habitats for these birds. In addition, two existing IBA areas, the Lastovo Islands and *Pučinski otoci* (Offshore Islands), which are also Special Protection Areas for birds (SPAs), have been expanded. The extension of the Lastovo Islands refers to the area southeast of Lastovo, important for the Mediterranean gull, and an additional 5 km towards the sea around the island of Sušac. The extension of Pučinski Otoci includes 5 km of additional sea space around the island of Svetac. However, this Proposal for a Regulation takes into account only two new IBA areas - HR1000041, the Northern Adriatic and HR10000412, the Lastovo Channel (the territorial sea of the Republic of Croatia). The remaining three new IBA areas, as well as the extensions of the two existing SPAs, are not included in the ecological network, despite the fact that the European IBA criteria for the selection of important areas for birds, listed in Annex I of the Regulation (OG 80/2019), clearly establish their relevance. The comment was taken note of and it was answered that the designation of new areas requires intensive prior communication with stakeholders, which was carried out for two IBA areas within these amendments to the Regulation.

We also supported the comment of the Biom Association: "Since the new Special Protection Area for birds (SPA) HR1000042 the Lastovo Channel is located in the immediate vicinity of the Nature Park and the existing SPA managed by the Public Institution Lastovo Islands Nature Park, and both areas share the same conservation goals, we believe that the competence for management should belong to the same institution - the Public Institution Lastovo Islands Nature Park. However, the proposal was not accepted with the explanation that the proposed SPA Lastovo Channel overlaps with the SPA HR3000426 Lastovo and Mljet Channels, which are managed by the Public Institution for the Management of Protected Natural Areas Dubrovnik-Neretva County, and consequently this PI was determined as responsible for the management of the proposed SPA.

We proposed revising the boundaries of the ecological network HR4000017 Lokrum and HR4000007 Badija and the islands around Korčula in order to include all significant areas, especially the lower edge (in terms of depth) of habitat type 1120* *Posidonia* meadows. The same proposal was made in the subsequent research,

as well as in the management plans of these areas (for Lokrum - in the draft plan presented to stakeholders in December 2024). Expert references, mapping and monitoring reports were also given. The comment was not accepted with the explanation that Natura 2000 sites do not need to include the entire area of the habitat type from Appendix I of the Habitats Directive. Furthermore, Posidonia is also a strictly protected species that must be protected horizontally throughout the Adriatic. Therefore, the Natura 2000 network is not the only mechanism, but the mechanisms of spatial protection through the Natura 2000 network and the mechanisms of strict protection of species are complementary. Also, it was commented that the additional expansion of the area is not recognized as a specific activity in the Management Plan 6016 Korčula, while the Lokrum Management Plan is a draft rather than an adopted document.

- **Public insight into the Proposal for the Regulation on the Proclamation of the Special Marine Reserve Cape Stupišće with expert background and cartographic documentation**

We participated in a public consultation (Feb 19, 2025) in Komiža. On May 2, 2025, the Government of the Republic of Croatia adopted the Regulation on the Proclamation of the Special Marine Reserve Cape Stupišće, which gave this extremely valuable marine site permanent protection and became the first strictly protected marine area in the Split-Dalmatia County. The protection of Cape Stupišće is the result of many years of cooperation between experts, institutions and the local community, and Sunce has been involved from the very beginning (as part of the ADRIREEF project, the implementation of the consultation process and the preparation of an expert study for protection, etc).

- **Proposal for the Ordinance on Sport and Recreational Fishing at Sea**

Through the e-Consultations portal, the Ministry of Agriculture, Forestry and Fisheries conducted a public consultation on the said Ordinance from March 24 to April 23, 2025. However, due to the exceptional interest of stakeholders (more than 1000 comments), its adoption was postponed and further work was announced to improve its content.

Sunce supported the adoption of the Ordinance that will better regulate sports and recreational fishing. In the comments, we tried to propose solutions to the shortcomings of the Ordinance related to the number of individuals caught, record-keeping and the reliability of catch data, and monitoring the impact of fishing activities in protected areas. We emphasised the importance of strengthening control at sea, in ports, at points of sale and in hospitality establishments, along with increasing the number of inspections and the capacities of competent authorities.

- **Law on the implementation of Regulation (EU) 2024/1991 of the European Parliament and of the Council of June 24, 2024 on nature restoration and amending of the Regulation (EU) 2022/869**

Out of three key comments submitted by Sunce, not one was fully accepted, i.e. one comment was partially accepted, in the part related to the coordination of measures for the restoration of marine ecosystems within the Common Fisheries Policy. Key proposals related to stronger involvement of the maritime, fisheries and aquaculture sectors in the implementation of nature restoration measures were not accepted, with the explanation that these aspects are already covered by existing legislative and planning instruments.

We proposed the inclusion of the state administration body in charge of maritime affairs (Maritime Safety Directorate) among the competent bodies for the implementation of the Act. It was argued that free anchoring represents one of the key pressures on marine and coastal habitats (especially Posidonia meadows and coralligenous communities), with often irreversible damage, and that the maritime sector has key tools and competencies for the regulation of anchoring and the management of the maritime domain. The comment was not accepted with the explanation that the Ministry of the Sea, Transport and Infrastructure is not recognized as a competent authority because the Act does not identify measures that

would be within its exclusive jurisdiction. The Ministry will participate in the development of the National Nature Restoration Plan and continue to perform tasks for the protection of the sea and maritime domain in accordance with existing regulations and international conventions.

We pointed out that in Article 5(2), the Ministry's activities are limited to agriculture and forestry, while fisheries and aquaculture are omitted, despite their significant impact on marine ecosystems. The need for systematic regulation of fisheries and aquaculture, especially in protected areas and areas of the ecological network, for the effective restoration of marine habitats and species was highlighted. This comment was not accepted either, with the explanation that aspects of habitat and species protection are already integrated into the system of spatial planning and strategic environmental impact assessment and impact assessment of individual interventions, which is a prerequisite for the issuance of permits. Therefore, no further extension of the scope in this Article was accepted.

We also pointed out that spatial planning is reduced exclusively to urban green areas, although it plays a key role in the preservation of protected areas, areas of the ecological network and coastal and marine ecosystems. The importance of spatial planning for the regulation of anchoring and the prevention of habitat degradation, such as Posidonia meadows, was particularly emphasized. The comment was partially accepted by proposing to add a new subparagraph to Article 5(2):

'- coordinates restoration measures in marine ecosystems within the framework of the Common Fisheries Policy, in accordance with Article 18 of the Regulation (EU) 2024/1991.'

- **Draft Report on the Evaluation of Nature Protection Strategy and Action Plan of the Republic of Croatia for the period from 2017 to 2025**

Based on the conclusions of the 1st meeting of the Working Group for the Drafting of the Nature Protection Strategy and Action Plan of the Republic of Croatia for the period 2026 – 2035, held on June 23, 2025 in Zagreb, the Ministry of Environmental Protection and Green Transition prepared a Draft Report on the evaluation of Nature Protection Strategy and Action Plan of the Republic of Croatia for the period from 2017 to 2025. The draft was submitted to all members of the Working Group for further comment for the purpose of its refinement. Sunce, as a member of the Working Group acted as a representative of the network of environmental protection associations of Croatia Green Forum, sent its comments on the Draft Report together with the comments of other members of the Green Forum who joined in the commenting.

Sunce's comments were mostly about the efficiency of management. Namely, we believe that a great shift has been made in the establishment of the legislative framework and the proclamation of new protected areas in the past period, but what is still missing is the effective implementation of protection in the field. In addition, we asked for our LIFE Artina project to be added to the Report, especially because it was on the basis of it that for the first time in Croatia the areas important for the conservation of seabirds from the order of Yelkouan shearwaters (*Puffinus yelkouan*) and Scopoli's shearwaters (*Calonectris diomedea*) were designated, with the adoption of the new Regulation on the Ecological Network, which extended the Natura 2000 network to marine areas. In this way, the project directly helped to achieve 30% of the protection of the sea surface.

We believe that the Draft has been significantly improved based on the comments received, and in addition, the reports that we have sent (EFFICIENTN2K analyses, LIFE reports) will be used in the preparation of the Report on the State of Nature.

Furthermore, within **the organizational objective Maintained continuity of Sunce's action in processes related to the development and activities of civil society**, we have also participated in the following consultations:

- **Regulation on the Criteria for Identifying Beneficiaries and Distribution of Income from Games of Chance for 2025**

The holder of the public consultation was the Office for Cooperation with NGOs of the Government of the Republic of Croatia. The consultation, despite the previous submission of the same comments, was carried out in an even shorter period than in 2023 and in 2024, i.e. from April 9 to 14, 2025. The thematic session of the Council was held on March 3, 2024 and was attended by the Executive Director of Sunce as a member. The final percentages of the distribution of funds in the Regulation available on the e-Consultations portal were different from those highlighted at the Council session. The comments we submitted, as in previous years, were related to the procedure for adopting the Regulation, the duration of the consultations and the role of the Council, as well as the proposal to include a separate category of environmental and nature protection among the categories that determine the percentage of financing. Both proposals were not accepted.

It is important to point out, as stated in the Report on the Consultation, that the results in the Proposal for the Regulation are determined, to the greatest extent possible, in accordance with the amount of funds planned by the competent ministries and other public bodies in sectoral analyses for the determination of priority areas of financing programs and projects of interest for the common good implemented by associations and other civil society organizations from public sources for the current year and in accordance with the analysis of consumption in the previous year. The sectoral analysis for determining the priority areas of financing programs and projects of interest for environmental protection, which is carried out by environmental civil society organizations and other associations, is prepared by the EPEEF and is of very poor quality and environmental civil society organizations are insufficiently involved in its development.

- **Draft Proposal for the Public Tender for the Co-Financing of Projects in the Field of Environmental Protection and Energy Efficiency of Civil Society Organizations (Associations)**

Through the website of the Environmental Protection and Energy Efficiency Fund, from May 16 to 29, 2025, we participated in the consultation on the Draft Proposal for the Public Tender for the Co-Financing of Projects in the Field of Environmental Protection and Energy Efficiency of Civil Society Organizations (Associations). Joint comments were submitted through the Green Forum network and we participated in their drafting. Part of the comment was of a technical nature, related to submitting project applications by mail and the submission of additional documentation, which was not accepted, while the comment related to the need to use the project description form in Word format instead of an Excel spreadsheet was accepted. Comments related to the anticipated measurable outcomes, recognition of indirect costs, enabling pre-financing and recognition of volunteer work as co-financing of the project were not accepted. Comments on enabling the financing of "field" activities for the conservation of biodiversity and on the need to increase the maximum amount of monthly gross salary from 1,500.00 EUR to 2,000.00 EUR were accepted. Furthermore, as a result of Green Forum advocacy, the maximum amount per individual project was increased to 20,000.00 EUR in the tender proposal itself, while in 2024 it amounted to 10,600.00 EUR, and the total available funds for NGO projects increased from 400,000.00 EUR in 2024 to 1,000,000.00 EUR in 2025.

- **Draft Proposal for the Decision on the Allocation of Business Premises for Use by a Civil Society Organization**

The City of Split conducted a public consultation from January 14 to February 12, 2025, via its website. Out of a total of nine comments from Sunce, none were accepted. Poor criteria and the scoring methodology

defined by the Decision were also reflected in the call for the allocation of business premises for use by civil society organizations, carried out in May 2025. Thus, by the time these reports are made, the call has not yet been completed and no premises have been allocated to civil society organizations. The scoring of certain criteria in the Decision is questionable, as it relies on personal and subjective assessments by committee members, allowing for potential manipulation of scores.

- **Draft Rules for Co-Financing Projects of Civil Society Organizations Contracted Under European Union Programmes and Foreign Funds for 2025**

The holder of the document was the Office for Cooperation with NGOs of the Government of the Republic of Croatia. The consultation was conducted from April 28 to May 28, 2025. Key comments concerned reducing the co-financing share that can be granted for European Territorial Cooperation programmes to up to 60%, whereas in previous years this share amounted to 70%. Furthermore, we pointed out the need to increase the share of co-financing of LIFE projects from 50% to 70%. According to the consultation report, neither comment was accepted. However, in the final version of the Rules, the percentage that can be approved for the ETC programme remained 'up to 70%'. Nevertheless, in 2025, Sunce was granted 60% co-financing for the two Interreg projects that we submitted under this call.

Working Groups

Strategic Objective 1

- **National Council for the Circular Economy**

The National Council for the Circular Economy continued its work in 2025. Among the members of the council is a representative of non-governmental organizations in the field of environmental protection, Marko Košak from Zelena akcija, and one representative of Sunce (Tea Kuzmičić Rosandić) and Zelena Istra (Nina Brnić) were appointed as deputies. In 2025, one meeting of the working group was organized, on June 16, at which the Draft National Plan for the Development of the Circular Economy of the Republic of Croatia for the period from 2026 to 2032, as well as the first Action Plan for the implementation of the National Plan were adopted. Marko Košak participated in the meeting, while our other representatives reviewed the conclusions and the draft of the National Plan and the Action Plan via submitted materials.

Strategic Objective 2

- **Stakeholder Committee in the Project The European University of the Seas, University of Split**

In 2025, no stakeholder meetings were organized by the Universities as a part of the SEA-EU 2.0 project. The only activity related to the project, in which Margita Radman participated, was a webinar, organized by the SEA-EU Society Hub, on Dec 10, 2025 called Service-Learning Approaches in Event Management Classes.

Strategic Objective 3

- **Partnership Council for the Development and Implementation of the Strategy of the City of Split for 2030**

During 2025, just like in 2023 and 2024, there were no council meetings. However, in February, we sent a letter to all members of the Partnership Council related to the tree felling in Gundulićeva street due to the water supply reconstruction project, calling for an urgent Council meeting to ensure that the goals of the strategy do not conflict with one another. Split Development Agency (RaST) replied that the Council meeting will be held after the preparation of the report on the implementation of the strategy for 2024. In July, the Executive Director participated in an interview conducted by the company Impuls savjetovanje d.o.o. as part of the evaluation of the Strategy. The agency RaST submitted the findings of the mid-term external evaluation to all members of the Council in October, and after that there were no other activities of the Council. It is important to emphasize that the Decision on the Establishment, Appointment, Composition and Scope of Work of the Partnership Council for the Development of the Strategy of the City of Split until 2030 states that the Council was established to participate in the process of adoption and monitoring the implementation of the Strategy. It remains the responsibility of the City of Split, as the holder of the implementation of the Strategy, to determine the methods and ensure the monitoring of its implementation, and it is up to us to warn about these shortcomings.

- **Advisory Council for Integrated Coastal Planning and Management of Split-Dalmatia County**

Not a single meeting of this Council was held during the year. Although the Croatian partners of the DesirMED project launched an initiative in 2024 to establish a working body to contribute to the identification of problems caused by climate change and the application of nature-based solutions in the county, it was not established in 2025.

- **Partnership Council for the Development and Implementation of the Management Plan for the Old Town of Split**

In 2025, we did not participate in the activities regarding this Plan.

- **The Working Group for the Development of the 6th Report for the Aarhus Convention**

On October 31, 2024, the representative of Sunce, as a substitute representative on behalf of the Green Forum, was elected to the Working Group for the Development of the VI Report for the Aarhus Convention. This working group was established by the Ministry of Environmental Protection and Green Transition. The only meeting of this working group was held in October 2024. In March, we sent comments to The Working Group on the submitted draft of the IV Protocol on Pollutant Release and Transfer Registers Implementation Report (PRTR), while in June we participated in e-Consultations for the report (see chapter Public Consultations). Part of the comments also referred to the organization of the work of the working group, during which the final version of the Report was not delivered to the members before its publication on the e-Consultations portal. With the completion of the Report, the Working Group ceased its work.

- **Working Group for the Drafting of the Environmental Protection Act**

In August, on behalf of Sunce and the Green Forum, Ivana Krstulović was nominated to the working group, with Gabrijela Medunić-Orlić as a substitute. In addition to the representatives of Sunce, the working group on behalf of the Green Forum includes Željka Leljak Gracin from Zelena akcija and Tibor Mikuška from the

Croatian Society for the Protection of Birds and Nature. After the decision to establish the working group was made, there were no working group activities in 2025.

Strategic Objective 4

- **Working Group for Noble Pen Shell Protection**

This working group is active via an online mailing list. Through this channel, we receive and provide information about the condition of the noble pen shell in the field, finding live individuals, setting up collectors for juveniles, the success of maintaining individuals in aquariums, and similar matters. In 2025, we did not participate in the meetings of the working group.

- **Committee for Monitoring the Implementation of the Fisheries and Aquaculture Program of the Republic of Croatia for the Program Period 2021-2027**

One meeting of the Committee for Monitoring the Implementation of the Fisheries and Aquaculture Program of the Republic of Croatia 2021-2027 was held (Mar 11, 2025), which we did not participate in due to other activities in that period.

- **Island Committee Pakleni Islands**

We participated in one of a total of two meetings of the Island Committee in Hvar (Apr 28, 2025). The discussion was about the activities of the Pakleni Islands Strategic Plan that will be implemented in 2025. Also, new data on the pressures of nautical tourism in the waters of the Pakleni Islands were presented, as well as a plan for the layout of nautical anchorages (BIOPRESSADRIA project).

- **Working groups within the Croatian Marine Protected Areas Network**

We have participated in the work of three informal working groups within this network. For the species and habitat monitoring working group (HRMZP), we participated in one online meeting on March 10, while we could not participate in the other. As for the working group for advocating for ecological anchorages with the ultimate goal of preserving the meadows of the strictly protected seagrass *Posidonia*, we participated in the online meeting on April 22 and the live meeting on September 30, and commented on the questionnaire for stakeholders, the draft of which was prepared by the Public Institution Sea and Karst. The third working group is the group for the drafting of the Nature Protection Act and we participated in three online meetings (May 15, Jun 17, and Jul 14); we made an analysis of the chapters related to management and filled out an exhaustive internal questionnaire related to this on July 10, 2025.

- **Working Group for the Drafting of Proposals for the Amendment and Extension of the Strict Protection Zones in the Telašćica Nature Park**

The Public Institution Telašćica Nature Park established this working group in order to revise the current zoning of the park and explore the possibilities of changing and expanding the zones of strict protection. We participated by sending the information we had from previous research, reviewing draft documents and participating in four online meetings (Apr 23, Jul 1, Sept 22, and Nov 4).

- **Working Group on the Conservation of the Seagrass *Posidonia oceanica* in the Adriatic Sea**

The Ministry of Environmental Protection and Green Transition established this working group at the end of the year. The first meeting of the working group was held on November 27 in Zagreb, where we presented the results of satellite monitoring of ships and monitoring of Posidonia at several locations in the Adriatic. We revised the draft expert basis prepared by the Ministry and shared it with the Green Forum, on whose behalf we were elected to this working group.

- **Working Group for the Development of the Draft Strategy and Action Plan for Nature Protection of the Republic of Croatia 2026 – 2035**

The Ministry of Environmental Protection and Green Transition established this working group and we were elected to it on behalf of the Green Forum. We participated in the first meeting in Zagreb on June 23, we commented on the draft goals and the report on the implementation of the previous strategy, which was prepared at our initiative.

- **Working Group for the Implementation of Nature Restoration Regulation in Croatia**

An informal working group of CSOs, whose founder and leader is the association Biom, was founded at the end of the year. We could not participate in the meetings due to other previously scheduled meetings, but we were informed through the minutes and gave our comments on the documents.

Furthermore, within **the organizational objective Maintained continuity of Sunce's action in processes related to the development and activities of civil society**, we have also been involved in:

- **Council for Civil Society Development**

In 2024, the need to identify new members and replacements for individual organizations and institutions, including in the field of environmental protection and sustainable development, led to the election of a new member and a deputy for this area. From March 19 to April 4, 2025, the Office for Cooperation with NGOs conducted a public call for candidates. On behalf of the Green Forum, Gabrijela Medunić-Orlić was nominated as a member and Iva Šoštarić from Biom as a deputy member. In addition to the representatives of the Green Forum, Dubravko Šopar and Natalija Tutek from the Center for Social Innovation also ran. From April 25 to May 9, 2025, voting was conducted and representatives of the Green Forum were elected.

At the Council session on March 17, 2025, the Regulation on the Criteria for Determining Beneficiaries and the Method of Distribution of Part of the Income from Games of Chance for 2025 was discussed, and the representatives of CSOs in the Council presented the results of a survey conducted among CSOs on the role and effectiveness of the Council for Civil Society Development. This survey sought to obtain the opinion of civil society organizations on the work and activities of the Council, which failed to take on the role of one of the pillars of civil society in 2025.

At the Council session on April 25, 2025, the CERV Programme and the Swiss-Croatian Cooperation Programme were presented, i.e. its components intended to support the development of CSOs.

An online thematic session of the Council for presenting candidates for the European Economic and Social Committee (EESC) took place on June 25, 2025. At the Green Forum coordination meeting, it was decided that we will not nominate our representatives because, according to previous experience, there are no realistic chances for a positive outcome.

At the Council session on October 20, 2025, we discussed the allocation of premises owned by the Republic of Croatia and the Regulation on the criteria, benchmarks and procedure for leasing real estate owned by the Republic of Croatia to civil society organizations, within the framework of a public consultation. The session was also attended by representatives of the Ministry of Physical Planning, Construction and State Assets. The participation of Ivana Kordić from the Tatavaka association as a representative of the Green Forum was requested and agreed upon, due to her previous experience in participating in the commission for the allocation of state property, which was on behalf of the National Committee for the Development of Volunteering.

On November 27, 2025, a session of the Council was held in Zadar as part of the conference program From Vision to Change: Towards 2030, organized by the National Foundation for Civil Society Development. One of the topics was the implementation of ESF STEM projects, which was previously requested by Gabrijela Medunić-Orlić as a member of the Council and a representative of the association implementing the ESF STEM project. At the session, problems faced by organizations implementing this programme were presented (identified through a previously conducted survey). The problems are specifically related to the administrative burden, abuse of administrative power and loss of sight of the very goals of the call. During the year, in coordination with the Green Forum, we participated in voting for individual working groups for drafting legislative and strategic acts.

- **Working Group for the Development of the National Strategy for the Creation of an Enabling Environment for the Civil Society Development from 2024 to 2030**

A member of the working group for environmental protection and sustainable development on behalf of Sunce is Gabrijela Medunić-Orlić, who also represents the Green Forum. In 2025, as in the previous year, there was no activity in this working group, although the Plan was not adopted and there was no official notification of the abolition of the working group. On January 22, 2025, we sent an email to the Office for Cooperation with NGOs and all members of the working group, following the information from the Council meeting on November 27, 2024 on the adoption of the Plan by June 2025. We have not received a response. At the sessions of the Council for the Development of CSOs, it was also pointed out that National Strategy for the Creation of an Enabling Environment for the Civil Society Development was not adopted. However, at the session in Zadar, on November 27, 2025, the Director of the Office for Cooperation with NGOs announced a meeting regarding the Plan in January 2026 and its alignment with the EU Strategy for Civil Society, which was adopted in November 2025. The process of creating a strategic and planning framework for the work of civil society organizations (CSOs) has entered its tenth year without any results. The last strategic document referred to the period from 2012 to 2016. The Office for Cooperation with NGOs started an inclusive and participatory process of adopting the strategy for the period 2017-2021, but it was never adopted. The same process was started again in 2021 and has not yet been completed. Without a strategic framework, opportunities to strengthen the institutional, normative and financial framework to support civil society were also missed. This was partly reflected in the use of EU funds, the efficiency of programming, implementation and monitoring of the implementation of CSO projects. Ultimately, the uncertain environment has reduced the effectiveness of civil society organizations in achieving the goals for which they were established, negatively impacting the development of democracy in the Republic of Croatia.

Advocacy by Participating in Public Meetings and Events

We have participated in the events described under the results related to the four strategic objectives. Furthermore, part of the participation is also described under the results of projects and services

implemented within departments in the extended version of the report. In 2025, advocacy was also carried out by participating in and/or exhibiting at the events listed below.

Strategic Objective 1

- Workshop Preventing, Avoiding and Mitigating the Harmful Impacts of Lost and Abandoned Fishing Gear on Marine Life and Habitats, organized by WWF Adria (Tea Kuzmičić Rosandić and Matea Taraš, Jan 22, 2025, Brižine Fishing Port).
- Conference of Scientists, Specialists and Students on the Topic of Environmental Protection in the Republic of Croatia (5th ZORH Conference), organized by students of the Faculty of Chemistry and Technology in Split, together with the SEA-EU alliance, the Faculty of Materials, Metallurgy and Recycling in Košice, the Faculty of Chemistry of the University of Gdansk, the Student Section of the Association of Chemical Engineers and Technologists Split and the Faculty of Maritime Studies in Kotor (Tea Kuzmičić Rosandić, Dalka Zanki and Matea Taraš, Apr 9 – 11, 2025, Split).
- The conference AWASTER for a Circular Future: Youth Empowerment and Business Innovation, organized by Agenzia di sviluppo del Veneto Orientale, VeGal (Tea Kuzmičić Rosandić, Frane Madiraca and Dora Čukušić, Jun 24, 2025, Portogruaro, Italy).
- The conference Challenges and Solutions in the Fight for a Plastic-Free Sea, organized by the NGO Green Home (Tea Kuzmičić Rosandić as an exhibitor, Jun 17, 2025, online).

Strategic Objective 2

- GOOD School: A Journey Towards Environmental Awareness - Small Steps for a Sustainable Society, organized by the GOOD initiative for educators from Croatia (Margita Radman and Tea Kuzmičić Rosandić as exhibitors, Jan 17, 2025, online).
- 3rd session of the Ecocommittee of the Elementary School Brda (Martina Talajić, Apr 2, 2025, Split).
- BIP program Sustainable, Social and Participatory Learning for Innovative Transformation, organized by the Faculty of Humanities and Social Sciences in Split (Mihaela Mladar as an exhibitor, Jun 3, 2025, Split).
- Building Bridges: Youth Worker Alliance Development, organized by the Croatian Youth Network and the Agency for Mobility and EU Programmes (Domagoj Goreta, Nov 23 – 25, 2025, Zagreb).
- Scaling Nature-Based Solutions: Lessons on Adaptation from Split-Dalmatia County, organized by Split-Dalmatia County (Margita Radman, Dec 1, 2025, Split).
- Civic Education Within the Framework of New Reforms and Social Changes for 50 Representatives of the Members of the GOOD initiative, organized by the Center for Peace Studies (Mihaela Mladar, Jun 9, 2025, Zagreb).

Strategic Objective 3

- Workshop *How Can We Make Split Safer for Pedestrians and Cyclists?*, organized by ODRAZ and the City of Split (Tihana Arapović and Mihaela Mladar, May 13, 2025, Split).
- Collaborative forum as part of the project *The Semafor Tool of Rule of Law, Good Governance and the Anti-Corruption in Local Self-Government Units*, organized by the Miko Tripalo Center (Gabrijela Medunić-Orlić, Jun 24, 2025, Zagreb).
- *Paths That Last – Collaborating for a Sustainable Tourism in the Mediterranean*, organized by the Mediterranean Multi-Programme Mechanism (Mihaela Mladar, Jun 25 – 26, 2025, Split).
- Workshop for the development of the Destination Management Plan of the City of Split for the period 2026 – 2029, organized by the Tourist Board of the City of Split (Tihana Arapović and Dora Čukušić, Sept 17, 2025, Split).
- Practical seminar *From Constitutional Provisions to the EU Charter: Building a Legal Strategy for Strategic Litigation*, organized by the Center for Peace Studies (Eva Šore, Oct 21 – 22, 2025 and Oct 26 – 27, 2025, Zagreb).

Strategic Objective 4

- Presentation *Nautical Tourism and Posidonia*, organized by the Croatian Marine Protected Areas Network (Ana Miletić and Zrinka Jakl as exhibitors, Jun 3, 2025, online).
- Presentation *Coastal Erosion and the Importance of Seagrass Wrack*, organized by the Croatian Marine Protected Areas Network (Ana Miletić and Matea Špika as exhibitors, Jul 2, 2025, online).
- Panel discussion *Sustainable Fisheries Management, Development of Blue Fisheries and Empowerment of Coastal Communities*, organized by the Office of the European Parliament (Karla Jelić, Oct 10, 2025, Split).
- Panel discussion *Safety, Education and Sustainability as a Roadmap*, organized by the Croatian Skipper and Crew Member Association (CROSCA), (Matea Špika as a panelist, Oct 10, 2025, Biograd).
- Thematic online meeting *Between Expectations and Reality – We Question the Effects and Implementation of Protection on the Example of Coastal Fish Communities*, organized by the Croatian Marine Protected Areas Network (Zrinka Jakl as an exhibitor, Dec 9, 2025, online).

Within **the organizational objective *Maintained continuity of Sunce's action in processes related to the development and activities of civil society***, we have also been involved in:

- stakeholder consultations for the EEA Civil Society Fund in Croatia, organized by the EEA Civil Society Fund in Croatia (Gabrijela Medunić-Orlić, Mar 5, 2025, Zagreb);
- final conference of the Impact4Values program: Civil Society in Croatia - From Survival to Strategy, organized by the Slagalica and Solidarna foundations (Maja Jurić, Nov 2 - 3, 2025, Zagreb);
- From Vision to Change: Towards 2030, organized by the National Foundation for Civil Society Development (Gabrijela Medunić-Orlić, Nov 26 - 28, 2025, Zadar).

2.6. Annex: List of Projects

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
LIFE Artina – Seabird Conservation Network in the Adriatic	Nature Conservation Program / Nature Conservation Department	Biom Association	LIFE Programme of the European Union, Office for Cooperation with NGOs of the Croatian Government, Environmental Protection and Energy Efficiency Fund	Sept 1, 2018 – Aug 31, 2023; the project has been extended to Dec 31, 2023. Note: With the adoption of the Regulation on Amendments to the Regulation on the Ecological Network and the Responsibilities of Public Institutions Managing Ecological Network Areas on Jun 5, 2025, the project indicators were fulfilled and the submission of the final report and the payment of the remaining funds were enabled.	The contribution of the LIFE Programme of the European Union is 1,152,832 EUR (60% of the total project budget). The project is co-financed by: the Office for Cooperation with NGOs, the Government of the Republic of Croatia (74,204.80 EUR) and the Environmental Protection and Energy Efficiency Fund (301,700.34 HRK). The total approved project budget for Sunce is 461,488.00 EUR, of which Sunce needs to provide 184,579.00 EUR through co-financing (40%).

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
<p>BIOPRESSADRIA - Cross-border integrated strategy to reduce biodiversity loss due to anthropogenic pressures along Adriatic coast</p>	<p>Nature Conservation Department</p>	<p>Municipality of Monfalcone</p>	<p>EU, Interreg Cross-Border Cooperation Programme Italy-Croatia (Programme Priority 2 - Green and Resilient Shared Environment), standard project</p>	<p>Mar 1, 2024 - Aug 31, 2026.</p>	<p>Total project budget: 2,369,480.00 EUR. Financing of the programme by the European Union: 1,895,584.00 EUR (80%). The total budget of the project for Sunce is 352,470.00 EUR. The project is co-financed by the Office for Cooperation with NGOs of the Government of the Republic of Croatia in the amount of 49,345.80 EUR.</p>

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
ASPEH – Adriatic SPEcies and Habitats of coastal areas	Nature Conservation Department	Management Consortium of Torre Guaceto	EU, Interreg Cross-Border Cooperation Programme Italy-Croatia (Programme Priority 2 – Green and Resilient Shared Environment), standard project	Apr 1, 2024 – Sep 30, 2026.	<p>Total project budget: 1.923.240,00. Financing of the programme by the European Union: 1.538.592,00 EUR (80%).</p> <p>The project is co-financed by the Office for Cooperation with NGOs of the Government of the Republic of Croatia. The total budget of the project for Sunce is 311,580.00 EUR. The project is co-financed by the Office for Cooperation with NGOs of the Government of the Republic of Croatia in the amount of 43,621.20 EUR.</p>
NURS-MED - Gain knowledge of and monitor fish nursery habitats to improve management of protected areas	Nature Conservation Department	Septentrion Environnement	MedPAN	Jan 1, 2025 – Mar 31, 2026.	81.380,00 EUR (total budget for all partners)

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
Plastic-Free Croatian Island	Environmental Protection and Sustainable Development Department	Sunce	Dalmatian Islands Environment Foundation (DIEF), with funds received from the Conservation Collective through a partnership with Depeche Mode & Hublot	Apr 1, 2024 – Dec 31, 2025.	40.771,60 EUR
AWASTER – Adopting WASTE as Resource	Environmental Protection and Sustainable Development Department	IRENA – Istrian Regional Energy Agency Ltd.	EU, Interreg Cross-Border Cooperation Programme Italy-Croatia 2021/2027 (Program Priority 2 – Green and Resilient Shared Environment) standard project	Mar 1, 2024 – Aug 31, 2026.	Total project budget: 1,505,384.00 EUR. Funding of the programme by the European Union: 1,204,307.20 EUR (80%). Sunce's total budget: 251,220.00 EUR. The project is co-financed by the Office for Cooperation with NGOs of the Government of the Republic of Croatia with the amount of 30,146.40 EUR (60% of the required amount of co-financing).

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
<p>WASTEREDUCE – Integrated waste reduction strategies and solutions in protected and Natura 2000 areas</p>	<p>Environmental Protection and Sustainable Development Department</p>	<p>Institute for Agriculture and Tourism – IPTPO (Croatia)</p>	<p>EU, Interreg Cross-Border Cooperation Programme Italy-Croatia 2021/2027 (Program Priority 2 – Green and Resilient Shared Environment) standard project</p>	<p>Feb 1, 2024 – Jul 31, 2026.</p>	<p>Total project budget: 1,657,742.00 EUR of which 1,326,193.78 EUR is from the ERDF fund (80%) Sunce's total budget: 222,240.00.00 EUR of which 177,792.00 EUR is from the ERDF fund (80%). The project is co-financed by the Office for Cooperation with NGOs of the Government of the Republic of Croatia in the amount of 26,668.80 EUR (60% of the required amount of co-financing).</p>

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
FishNoWaste – Waste reduction and management in fishing ports of the Adriatic Sea to promote sustainable fisheries	Environmental Protection and Sustainable Development Department	University of Padova, Italy	EU, Interreg Cross-Border Cooperation Programme Italy-Croatia 2021/2027 (Program Priority 2 – Green and Resilient Shared Environment) standard project	Feb 1, 2024 – Jul 31, 2026.	<p>Total project budget: 2,407,914.74 EUR. Funding of the programme by the European Union (ERDF): 1,926,331.79 EUR (80%)</p> <p>Sunce's total budget: 353,780.00 EUR. Sunce's budget financed by the European Union (ERDF): 283,024.00 EUR. The project is co-financed by the Office for Cooperation with NGOs of the Government of the Republic of Croatia with the amount of 49,529.20 EUR.</p>
LooP Zone – promoting a circular economy with low plastic zones on mediterranean islands	Environmental Protection and Sustainable Development Department	ARC – MedWaves	EU Interreg Territorial Cooperation Programme (Interreg Euro-MED)	Sep 1, 2025 – May 31, 2029.	<p>Total project budget: 3.999.526,60 EUR.</p> <p>Total budget of Sunce: 388.146,10 EUR</p>

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
Tourism 2030 – Sustainability is my vibe	Environmental Protection and Sustainable Development Department	Sunce	Ministry of Tourism and Sports	Apr 1, 2024 – Jun 27, 2025.	The total amount of the project is 41,031.09 EUR, with MINTS co-financing amounting to 26,995.00 EUR.
Take a Ride – Split Bike Tour	Environmental Protection and Sustainable Development Department	Sunce	City of Split, Urban Planning and Construction Division, Department for Environmental Protection	Jun 1, 2025 – Nov 30, 2025.	4.500,00 EUR
Organization of clean-up actions and Sustainability Festival	Environmental Protection and Sustainable Development Department	Sunce	L'Oreal, Garnier	Jan 23, 2025 – Apr 25, 2025.	10.000.00 EUR
Split Bike Tour	Environmental Protection and Sustainable Development Department	Sunce	Tourist Board of Split-Dalmatia County	Jul 1, 2025 – Oct 23, 2025.	2.000,00 EUR
Split Bike Tour	Environmental Protection and Sustainable Development Department	Sunce	Split Tourist Board	Jul 1, 2025 – Oct 23, 2025.	300.00 EUR

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
Split Bike Tour	Environmental Protection and Sustainable Development Department	Sunce	Split Parking	Jul 1, 2025 – Oct 23, 2025.	240.00 EUR
Split Bike Tour	Environmental Protection and Sustainable Development Department	Sunce	Split-Dalmatia County	Jul 1, 2025 – Oct 23, 2025.	1.000,00 EUR
Split Bike Tour	Environmental Protection and Sustainable Development Department	Sunce	Promet Split	May 2, 2025 – Oct 31, 2025.	500.00 EUR
Green Phone – Lend your voice to the environment II!	Communication and Advocacy Department	Sunce	Environmental Protection and Energy Efficiency Fund	Mar 12, 2024 – Apr 15, 2025.	Total project value is 26,500.00 EUR; approved amount for co-financing is 10,600.00 EUR.
Green Phone – Lend your voice to the environment III!	Communication and Advocacy Department	Sunce	Environmental Protection and Energy Efficiency Fund	May 15, 2025 – Apr 1, 2026.	Total project value EUR 13,250.00; approved amount for co-financing 10,600.00 EUR.

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
DesirMED: Demonstration and mainstreaming of nature-based Solutions for climate Resilient transformation in the MEDiterranean	Communication and Advocacy Department	CMCC – Centro Euro-Mediterraneo sui Cambiamenti Climatici	EU, HORIZON-MISS-2022-CLIMA-01 programme. Research and Innovation Actions in Support of the Implementation of the Adaptation to Climate Change Mission	Jan 1, 2024 – Dec 31, 2028.	Total project value: 17,733,882.50 EUR. Total project funding: 16,938,059.00 EUR Total budget for Sunce: 428.250,00 EUR
Together – our voices and actions for the environment	Communication and Advocacy Department	Sunce	Imapct4Values 2.0.	Nov 1, 2025 – Oct 31, 2027.	56,981.96 EUR
Solidarity for Green Dalmatia 2023	Education and Information Department	Sunce	EU, European Solidarity Corps	Nov 1, 2023 – Apr 30, 2025.	39,732.00 EUR
Solidarity for Green Dalmatia 2024	Education and Information Department	Sunce	EU, European Solidarity Corps	Dec 1, 2024 – May 31, 2026.	60,463.00 EUR
VolonTERRA – Active Schools Initiate Changes!	Education and Information Department	Hollen Regional Center for Education	Deutsche Bundesstiftung Umwelt	Jan 1, 2024 – Dec 31, 2025.	Total project budget 159,998.00 EUR. Sunce's budget is 80,048 EUR. DBU finances 50% of the project (40,024 EUR)
Swap Fair - Wanna Trade?	Education and Information Department	Sunce	City of Split	Jan 1, 2025 – Dec 31, 2025.	5,246.25 EUR
ŠIZIKA	Education and Information Department	Sunce	Ministry of Science, Education and Youth	Oct 1, 2025 – Sep 30, 2027.	23.500,00 EUR

Project	Responsible department of Sunce	Lead partner	Major donors	Implementation period	Total project value for the entire implementation period
Sailing into STEM – A Map for 2030	Education and Information Department	Sunce	European Social Fund Plus	Mar 20, 2025 – Mar 19, 2027.	298,981.37 EUR
Three-year General Support Grant	Organization	Sunce	Sigrid Rausing Trust Foundation	Dec 1, 2022 – Nov 30, 2025, extended until Jan 31, 2026	300,000.00 GBP
Three-year Core Grant	Organization	Sunce	Hans Wilsdorf Foundation	Jan 1, 2025 – Dec 31, 2027.	270,000.00 EUR

2.7. Annex: List of Services

Service	Responsible department of Sunce	Client	Implementation period	Total service value for the entire implementation period (excluding VAT)
Expert Study for the Expert Basis for Changing the Boundaries of the Pakleni Islands Significant Landscape and the Implementation of an Educational Program for Children	Nature Conservation Department	Public institution for the management of protected areas of nature in Split-Dalmatia County - Sea and Karst	Feb 13, 2024 - Nov 30, 2024 (Contracting authority extended it until Mar 1, 2025)	12.800 EUR
Development of the Management Plan for the Special Forest Vegetation Lokrum Island and the Ecological Network Area HR400017 Lokrum	Nature Conservation Department	Public Institution Lokrum Reserve	Dec 18, 2023 - Mar 31, 2025.	9.900.00 EUR
Monitoring of target habitat type 1120 Posidonia meadows (island of Mljet)	Nature Conservation Department	Public institution Mljet National Park	Mar 10, 2025 - Dec 1, 2025.	14.500.00 EUR
Monitoring of the seagrass <i>Posidonia oceanica</i> in the area of the Telašćica Nature Park	Nature Conservation Department	Public Institution Telašćica Nature Park	Apr 24, 2025 - Dec 15, 2025	8.400,00 EUR
Design and implementation of a panel discussion on waste management City of Trogir	Environmental Protection and Sustainable Development Department	City of Trogir	Nov 4, 2025 - Dec 10, 2025.	1.100,00 EUR

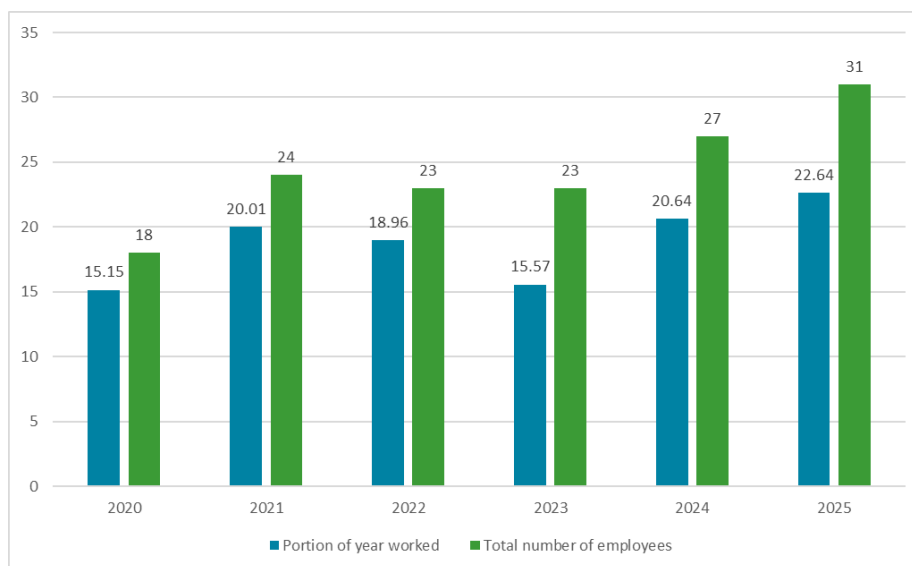
Service	Responsible department of Sunce	Client	Implementation period	Total service value for the entire implementation period (excluding VAT)
Design and implementation of a panel discussion on waste management in the Town of Vis	Environmental Protection and Sustainable Development Department	Town of Vis	Dec 8, 2025 – Dec 31, 2025.	400,00 EUR
Design and implementation of the panel discussion on waste management Town of Komiža	Environmental Protection and Sustainable Development Department	Town of Komiža	Dec 8, 2025 – Dec 31, 2025.	400,00 EUR
Preparation of a Transition Study (Cost-benefit Analysis) for the area of the Public Institution Brijuni National Park	Environmental Protection and Sustainable Development Department	Public Institution Brijuni National Park	Jan 1, 2025 – Jan 31, 2026.	20,000.00 EUR
Workshop on Sustainable Tourism and Circular Waste Management	Environmental Protection and Sustainable Development Department	Tourist Board of Split	Nov 14, 2024 – Jan 13, 2025 (service implemented in 2024, charged in 2025)	1.200,00 EUR
Organization of workshops with citizens on the topic of marine litter in the area of Kaštela as part of the Bluecircle project	Environmental Protection and Sustainable Development Department	Town of Kaštela	Nov 13, 2025 – Dec 31, 2025.	15.000,00 EUR
Hands on training for the adaptation of the educational program Composting	Education and Information Department	Parks of the Dinarides, Montenegro	Nov 12, 2024 – Apr 9, 2025.	2.960,00 EUR
Education of children - Preservation of Biodiversity for Blato Kindergarten, Korčula	Education and Information Department	Municipality of Blato	Aug 27, 2025 – Dec 24, 2025.	3.500,00 EUR

3. ORGANIZATIONAL DEVELOPMENT

In 2025, work continued on the harmonization of organizational documents related to restructuring, and in May, a new Rulebook on Volunteer Engagement was adopted, as well as the accompanying Volunteer Program, which includes all programs, projects and activities implemented within Sunce and individual departments, in which volunteers are involved. The Decision on Job Systematization and Employee Salaries has been improved. In cooperation with Prava formula d.o.o., the Standard Procedure for Employee Performance Evaluation has been improved, an open 360 evaluation has been agreed and the tools used in evaluation have been changed and supplemented. The Work Regulations were revised and adopted at the meeting of the Executive Board on Aug 26, 2025. We also cooperated with the company Prava formula d.o.o. on employee education. Thus, a cycle of First Time Manager (FTM) education, an individual coaching, was conducted for managers, while some of the employees involved in working with interns, assistants, students and volunteers participated in the mentoring education program (April 8 and 29, 2025). Although slightly lower than in 2024, there was also a high employee turnover in 2025, mostly due to new hires (as many as seven new employees), maternity leave (four), and we also had one employee resignation. In order to increase the motivation of employees to retain and prevent further fluctuation in the Association, during 2025 most work was done on providing opportunities for further education, and the salary base was raised from 1 January 2025 and was not further increased during the year.

In February 2025, we started the process of assessing the impact of Sunce's work for the period from 2015 to 2025. For this evaluation, Marina Škrabalo was hired, who also conducted the impact assessment for the previous ten-year period from 2005 to 2014. As part of this assessment, a study of the perception of Sunce in Dalmatia was conducted, for which the IPSOS agency was hired. After agreeing on the methodology, key questions of the research, the area of implementation and the optimal sample, the research was conducted at the end of August and in September. The results showed that 32.07% of respondents knew about Sunce. Furthermore, the research confirmed the expected higher recognition in Split (48%) and other settlements in Split-Dalmatia County (44%), compared to three other counties, where the level of recognition is at the overall level of 17%. The results of the assessment will be useful to us, among other things, in 2026 in strategic planning for the next five-year period.

In total, 31 people were employed in Sunce in 2025, which is an increase compared to 27 in the previous year. However, annually, full-time, the number of employees was 22.64, which is an increase of two employed persons (2024, 20.64). Thus, 2025 is a record year in terms of the number of employees.

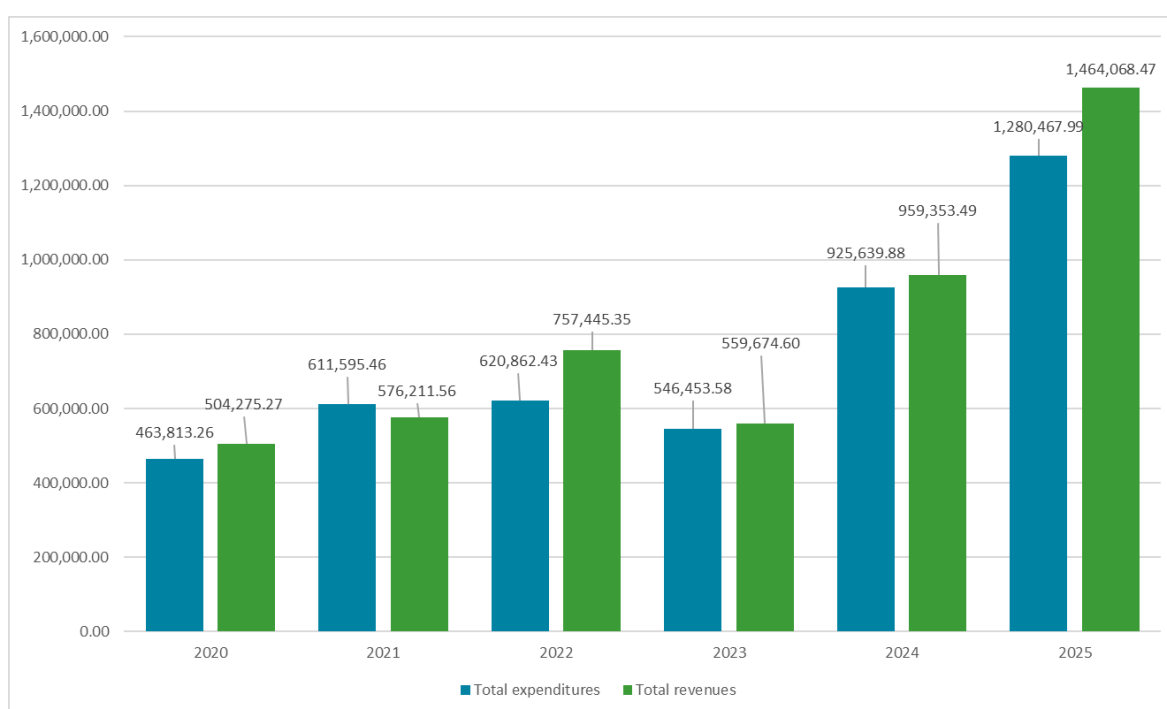


Graph 4: The number of employees from 2020 to 2025

The average gross salary in Sunce in 2025, calculated on the basis of paid wages, amounted to 2113.95 EUR, while the average net salary was 1493.58 EUR. In the same period, the average gross salary in the Republic of Croatia was 2016.08 EUR, while the average net salary was 1449.25 EUR.

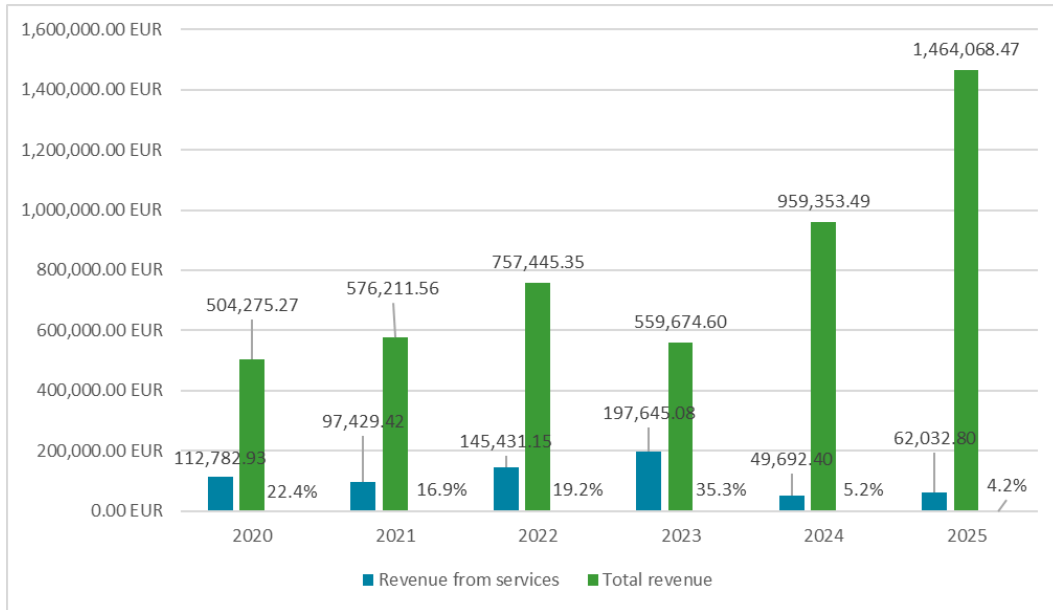
The median gross salary in Sunce in 2025 was 1509.59 EUR, while the median net salary was 1085.96 EUR. For comparison, the median gross salary in the Republic of Croatia in 2025 was 1684.08 EUR, while the median net salary was 1237.92 EUR.

Revenue of 1,464,068.47 EUR was achieved, which is the highest income since the founding of Sunce and represents an increase of 52.6% compared to 2024 (Graph 5). This increase is the result of the continuation of the implementation of numerous projects, especially Interreg Standard projects, new projects, but also organizational support, especially the Sigrid Foundation and the Hans Wilsdorf Foundation, which enabled part of the capacity to be directed to organizational development.



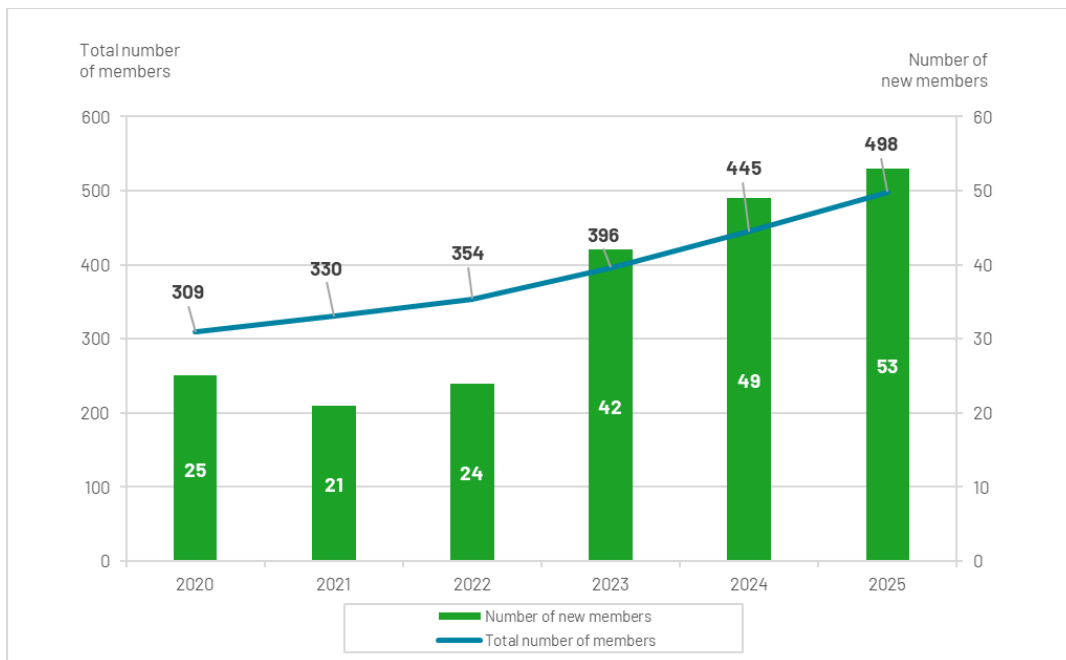
Graph 5: Trends in total revenues and total expenditures from 2020 to 2025

In 2025, the share of income from economic activity in total revenues declined further. Namely, revenues from economic activities increased from 49,692.40 EUR in 2024 to 62,032.80 EUR, but Sunce's total budget also grew significantly, which led to a drop in the share of economic activity to 4.2%.



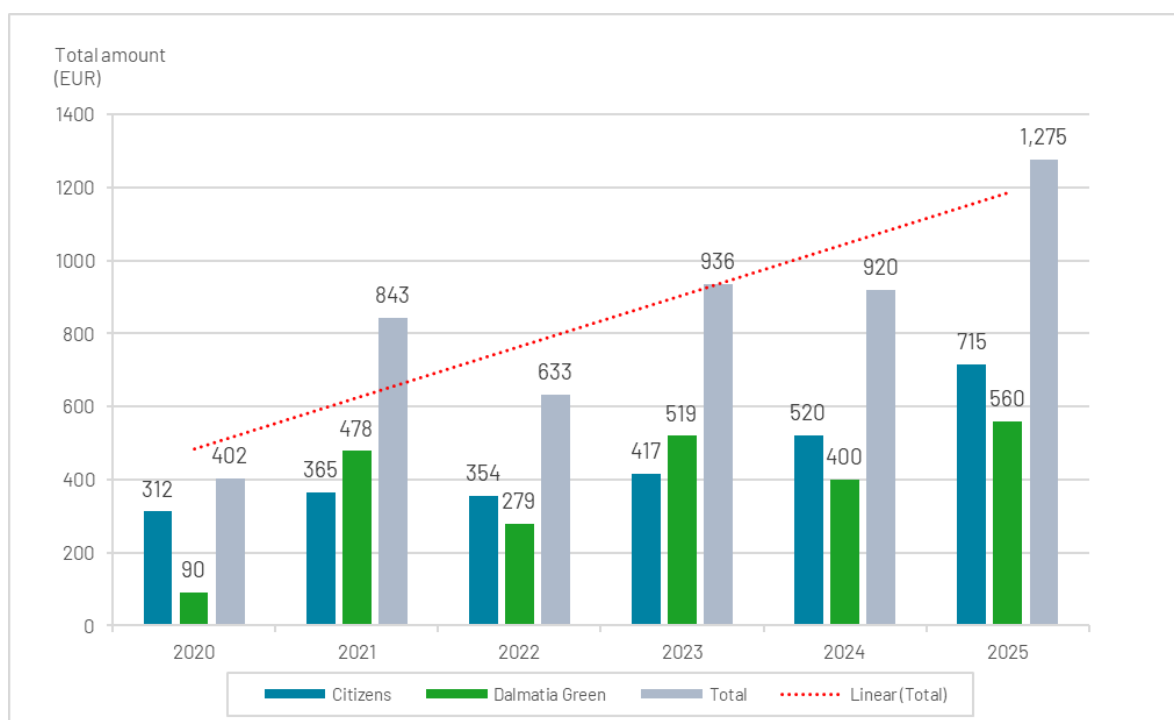
Graph 6: Trends in service revenues and total revenues from 2020 to 2025

The new Work Plan for Members and Volunteers of Sunce for the Period from 2025 to 2027 was developed at an internal workshop on March 21, 2025. Unlike the previous Plan, the new plan also included activities intended for volunteers. In the previous two-year period, the emphasis was on the development of membership, and in the next two-year period, the priorities are focused on maintaining existing activities, strengthening communication channels (newsletter), expanding membership benefits and increasing engagement in involving volunteers, especially local ones. During the year, cooperation was established with nine partners from the business sector who offered benefits for members and volunteers. A total of 54 people joined, and so at the end of 2025, Sunce had 498 members.



Graph 7: Trends in the number of members of Sunce from 2020 to 2025

Along with the continuation of the trend of growing members of Sunce, the upward trend in paid membership fees also continued. Thus, in 2025, 72 members paid the membership fee, which is 14.3% of the total number of members. The number of paid membership fees in previous years was: 40 in 2022, 42 in 2023 and 59 in 2024.



Graph 8: Trends in the amount of paid membership fees from 2020 to 2025

A total of 15 out of 39, or 38.5% of active members, are not Sunce employees.

4. FINANCIAL STATEMENT

Generated revenue of Sunce in 2025	Revenue amounts
Foreign sources (foreign governments and international organizations)	232.855,58 EUR
Foreign sources (EU funds)*	1,024,783.52 EUR
Budget, state	30.066,47 EUR
Budget, local	13,046.25 EUR
Own revenue generated by performing permitted activities	62,032.80 EUR
Donations from the business sector of the Republic of Croatia	40.137,06 EUR

Membership fees	1.275,00 EUR
Donations from citizens of the Republic of Croatia	2.247,00 EUR
Other (sales revenues, refunds, etc.)	57,624.79 EUR
Sunce's total revenues in 2025	1,464,068.47 EUR
Generated expenditure of Sunce in 2025	Expenditure amounts
Salaries, allowances and contributions for employees	693,898.32 EUR
Compensation for employees to cover the costs of business trips, workshops, seminars	60,712.93 EUR
Fees for consultants and associates (foreign and domestic) and persons outside of employment (fees, copyright and work contracts and travel expenses)	25,847.73 EUR
Volunteer expenses	17,362.67 EUR
Expenses on services (rent, telephone, maintenance, etc.)	191,573.85 EUR
Costs of material	18.818,36 EUR
Intellectual and personal services (contracts, bookkeeping services, <i>Student servis</i> , etc.)	89,640.01 EUR
Other expenses (membership fees, donations, banking services, depreciation, etc.)	182,614.12 EUR
Total expenditure of Sunce in 2025	1,280,467.99 EUR

Table 1: Revenues and expenditures in 2025

**Note: refers to funds received for financing and co-financing projects from Interreg Italy Croatia (standard), Horizon, ESF+, ESS, Erasmus programme, Impact4values, LIFE (in the statement of revenue and expenditure recorded in the state budget / EU institutions and bodies / legal entities for EU projects - depending on the payer of funds).*



sunce

Association for Nature, Environment and Sustainable Development Sunce

Obala hrvatskog narodnog preporoda 7
21000 Split, Croatia

Phone: +38521360779

Mobile: +385913607790

Green Phone: 072/123456

E-mail: info@sunce-st.org

Web: sunce-st.org