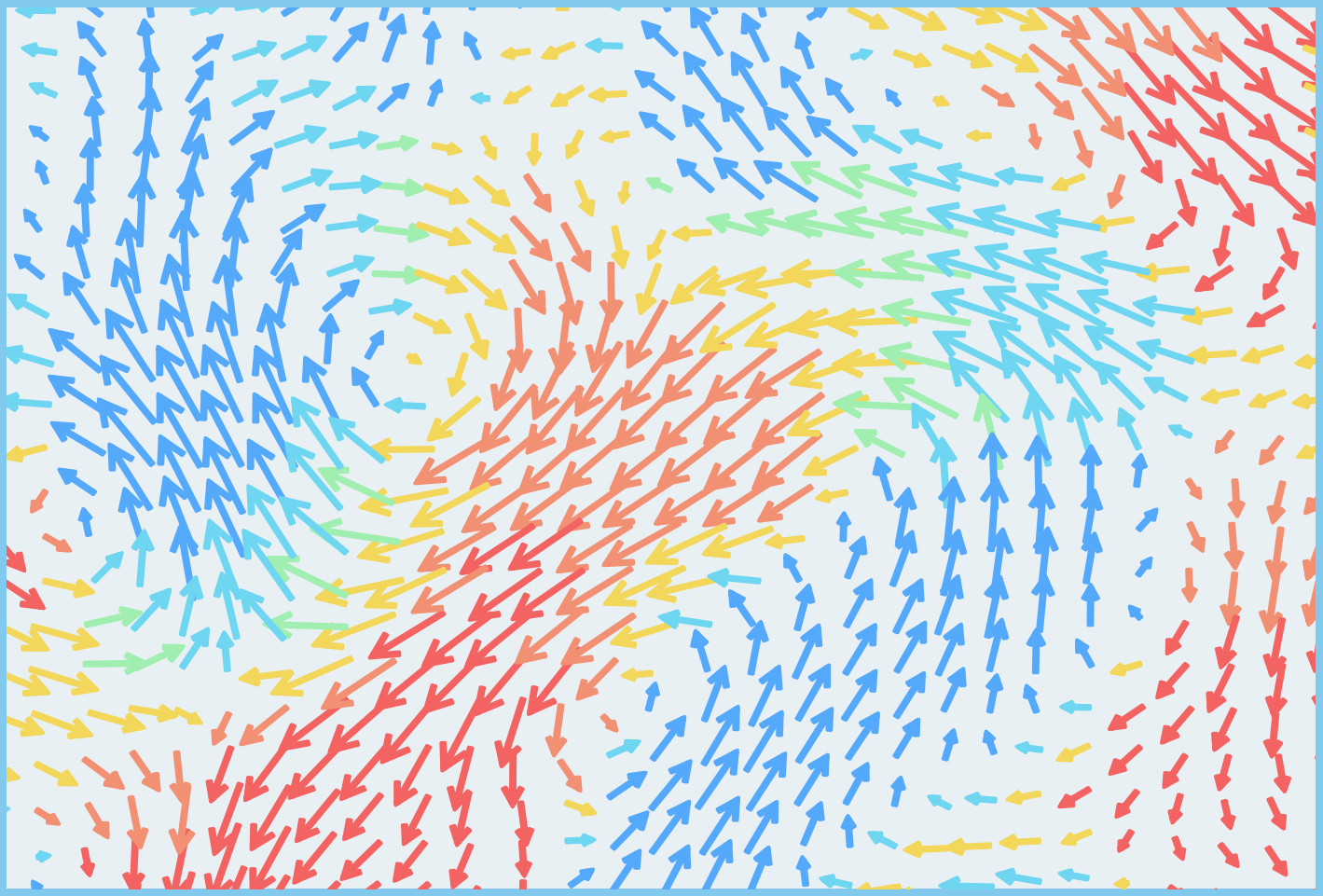
FRIEDRICH NAUMANN FOUNDATION For Freedom.
Central Europe

FREEDOM AND PROSPERITY
LIBERTY.EU

Civic Space Report
October 2026



4liberty.eu Civic Space Report 2025/2026

Between Backlash and Breakthrough: Civil Society in CEE amid Political Turmoil

4liberty.eu Civic Space Report 2025/2026

Between Backlash and Breakthrough:
Civil Society in CEE amid Political Turmoil

Imprint

Publisher

Friedrich Naumann
Foundation for Freedom
Central Europe
Jugoslávská 620/29
120 00 Prague
Czech Republic

https://www.freiheit.org/centraleurope

LinkedIn: FNF Central Europe
Instagram: fnf_centraleurope

Authors

Boris Strečanský
Milosz Hodun
Martin Pánek
Oksana Kuziakiv
Igor Ciurea
Nino Kalandadze
Márton Schlanger
Hanga Milla Erdélyi
Cecília Földessy-Stiegemeier

Editors

Barbora Krempaská
Boris Strečanský
Dan-Aria Sucuri

Date

October 2026

Contact

E-mail: fnf-prag@freiheit.org

Notes on using this publication

This publication is an information offer of the Friedrich Naumann Foundation for Freedom.

It is available free of charge and not intended for sale. It may not be used by parties or election workers for the purpose of election advertising during election campaigns (federal, state or local government elections, or European Parliament elections).

Table of Contents

1. Introduction **9**

Political Developments 10

Consequences on Civic Space 11

2. Methodology **14**

Standards 14

Scoring Logic 15

Limitations 17

3. Selected Findings **19**

Diverging trajectories 19

Universal “Foreign agent” narrative and its limits 20

Civic space recovery: Rhetoric and behavioral change are fast and precede institutional and systemic changes 21

The gap between the formal and lived 22

The importance of courts and other countervailing institutions 23

EU leverage 24

Pressure breeds resistance and resilience. 24

Resource fragility structurally salient in candidate countries 26

CSOs in policymaking face difficulties 27

Heatmap 29

4. Poland **30**

Introduction 31

Cluster A – Institutional and Political Environment and Narratives of CSOs 32

Cluster B – Legal and Financial Framework for CSOs 39

Cluster C – Public Engagement and Perceptions towards the Work of CSOs 45

Cluster D – CSOs as Policy Makers 50
Conclusion 56
References 57
Legal and Policy Documents 59
Endnotes 60

5. Czech Republic 61
Introduction 62
Cluster A – Institutional and Political Environment and Narratives of CSOs 63
Cluster B – Legal and Financial Framework for CSOs 68
Cluster C – Public Engagement and Perceptions towards the Work of CSOs 73
Cluster D – CSOs as Policy Makers 78
Conclusion 85
References 86

6. Ukraine 88
Introduction 89
Cluster A – Institutional and Political Environment and Narratives of CSOs 90
Cluster B – Legal and Financial Framework for CSOs 96
Cluster C – Public Engagement and Perceptions towards the Work of CSOs 102
Cluster D – CSOs as Policy Makers 108
Conclusion 114
References 115

7. Moldova 117
Introduction 118
Cluster A – Institutional and Political Environment and Narratives of CSOs 119
Cluster B – Legal and Financial Framework for CSOs 124

Cluster C – Public Engagement and Perceptions towards the Work of CSOs 129
Cluster D – CSOs as Policy Makers 134
Conclusion 138
References 139

8. Hungary 142
Introduction 143
Cluster A – Institutional and Political Environment and Narratives of CSOs 145
Cluster B – Legal and Financial Framework for CSOs 152
Cluster C – Public Engagement and Perceptions towards the Work of CSOs 159
Cluster D – CSOs as Policy Makers 166
Conclusion 172
References 173
Legal sources 175
Interviews 176

9. Slovakia 177
Introduction 178
Cluster A – Institutional and Political Environment and Narratives 179
Cluster B – Legal and Financial Framework for CSOs 186
Cluster C – Public Engagement and Perceptions towards the Work of CSOs 193
Cluster D – CSOs as Policy Makers 198
Conclusion 203
References 204

10. Georgia 209
Introduction 210
Cluster A – Institutional and Political Environment and Narratives of CSOs 211

Cluster B – Legal and Financial Framework for Civil Society Organizations 219
Cluster C – Public Participation and Perceptions of Civil Society Organizations' Work 225
Cluster D – CSOs as Policy Makers 232
Conclusion 238
References 239
Endnotes 246

11. Annex A – Set of Standards 247
Cluster A – Institutional and Political Environment and Narratives of CSOs 247
Cluster B – Legal and Financial Framework for CSOs 248
Cluster C – Public Engagement and Perceptions towards the Work of CSOs 249
Cluster D — CSOs as Policy Makers 250

12. Annex B – Key terms 252
Civil Society 252
Civil Society Organization 252
Civic Space 253

13. References 254

The 4liberty.eu is a platform for experts and intellectuals from Central and Eastern Europe, embodying the liberal environment, to share their opinions and ideas.

Representatives of 15 think tanks from various countries including Poland, Hungary, Slovakia, Slovenia, the Czech Republic, Bulgaria, Ukraine, Estonia, Lithuania, and Germany regularly publish comments, analyses, and polemics encompassing political, economic, social and cultural life, as well as subjects of heated debate in the media, all shown from a Central European perspective.

The Friedrich Naumann Foundation for Freedom is a German liberal political foundation, founded in 1958. Its mission is to support liberal democracy, human rights, rule of law and market economy by promoting political education, open dialogue, and research in liberal policy.

Its office for Central Europe, based in Prague, acts as an umbrella organisation for the network 4liberty.eu. The Prague office seeks to strengthen liberal political and intellectual forces in Central Europe and supports 4liberty.eu as a centre of competence and a platform for dialogue at both national and European levels.

1. Introduction

By Boris Strečanský

This report is part of a project that aims to provide a well-grounded geographic (and, in subsequent years, temporal) comparative assessment of civic space in the covered countries from a liberal perspective.
Its main output is this report, which is addressed to policymakers, media, journalists, civil society activists, government and public officials, members of parliament, and political party professionals, to provide an informative yet granular view of what matters in civic space and for civil society.

The project proposes a liberal model for civil society organization (CSO) operations in the public sphere—their operational conditions, political environment, public engagement, perceptions of CSOs, and role in shaping policies—and uses it as a reference point to rank countries by how close their civic space is to liberal standards. A key principle of the assessment is that it considers what is lived and happens on the ground and captures the material consequences of policies, laws, decisions, and actions relevant for civic space, rather than what is on paper, in regulations and books.

The assessment uses the CSO term because the NGO term is a narrower concept than CSO and we want to avoid systematically under-reflecting the range of civic engagement. The broad definition of CSO includes formal organizations and informal entities (collectives, coalitions, initiatives, gatherings, petitions, protests, movements etc.) that meet the characteristics of being private-law subjects; self-governing; not distributing profit to their founders; voluntary but also professional; and not controlled by any public power or authority or for-profit entity. The project excludes political parties; churches and church-based organizations; and trade unions.

The report assesses seven countries from January 2025 until summer 2026. Countries covered include the Visegrád group (Poland, the Czech Republic, Slovakia, and Hungary, all EU members) and the three EU candidate countries (Ukraine and Moldova in the accession process and Georgia – with its frozen status). In the future, it is planned to expand the report coverage to further European countries to capture the region's scope more fully.

During the assessed period, all countries included in the assessment faced Russian hybrid pressure and shared external shocks such as the 2025 withdrawal of US funding and the spread of "foreign agent" legal initiatives in the region. The EU's leverage and normative power through its bodies, such as CJEU rulings and regulations such as the Anti-SLAPP Directive and accession conditionality, played an important role.

However, the assessed period (2025-2026) has been remarkable in the region because of major political breakthroughs and turmoils.

Political Developments

Political developments in three of the assessed countries were very turbulent.

First, Moldova underwent an anti-oligarchic, pro-Western liberal-democratic turnover. September 2025 parliamentary elections were held under an unprecedented campaign of Russian hybrid interference, including large-scale vote-buying networks, disinformation, and cyberattacks. Soon after, the next dramatic elections took place in the Czech Republic in October and resulted in a change in government. And, most significantly, the April 2026 Tisza victory in Hungary shifted the perspective on entrenched, long-term democratic backsliding and raised new questions about how bottom-up grassroots political mobilization in communities can replace long-embedded authoritarian political and economic elites from well-fortified positions.

Slovakia and Poland limp toward the parliamentary elections in September 2027, but in different political constellations: Slovakia's 4th openly

illiberal, socially conservative, and state-capturing Fico government is tilting Slovakia toward the EU's fringes with its anti-EU and pro-Russian orientation. Tusk's liberal-democratic and reformist Poland, while maintaining a rising economic and commendable defense posture, struggles as it enters the last year of its term, grappling with how to restore democratic governance and related institutional reforms at a pace and in a way that satisfies its core electorate's expectations. Georgia entered 2025 after highly contested elections in late 2024 that the domestic political opposition considered invalid and illegitimate. The uneven playing field has led to further politicization and weaponization of state institutions and a strengthened grip on power by the ruling party Georgian Dream (GD) controlled by the Russian-tied oligarch Bidzina Ivanishvili. Finally, Ukraine's political system has remained institutionally stable under martial law, with elections constitutionally suspended and broad public consensus behind national defense. Yet domestic accountability tensions resurfaced.

Overall, the period assessed shows a heterogeneous, shifting political landscape moving in contradictory directions. Some countries are on the path of post-authoritarian recovery (Poland, Hungary). Others cope with illiberal and authoritarian tendencies (mostly Slovakia and mainly Georgia, partly Czechia). Ukraine remains a special case, and Moldova has a fragile constellation and outlook. The common feature of political development is a deterioration of politics through growing societal polarization and contradictory pressures (Russia's hybrid influence vs. EU pull and institutional anchoring). Another feature is the strengthening of executive action in both directions – democratic restoration and authoritarian backsliding by all means. At the same time, civil society remains dynamic, resilient, and active across different contexts and conditions, yet often fragile and resource-strained.

Consequences on Civic Space

As a result, during this period, the countries assessed have shown divergent rather than uniform tendencies in shaping civic space.

→ Poland and Hungary are, at the time of writing this report, restoring their democratic trajectory, facing the challenges of re-democratization after a period of democratic backsliding, captured state, and authoritarian tendencies. In Poland, government hostility and discriminatory practices have substantially receded, although institutionalization of the recovery remains incomplete. In Hungary, for now, the major victory of democratic opposition in April 2026 affected the CSO-government relationship through shifts in attitude and rhetoric and has not yet translated into systemic changes. In both countries, the government-CSO relationship is undergoing major restructuring, and the trend is improving.

→ Moldova is also a case of democratic resilience. The situation remains fragile because of the polarized electorate. In Moldova (and Ukraine), the EU accession process shapes civic space, but with significant variations. At the same time, the country struggles with institutional failures, capacity gaps, and the distance between the formal framework and everyday practices, including civil society capacity, agency, and trust.

→ Ukraine is, as already mentioned, an exceptional case given its wartime conditions, with martial-law constraints, institutional overload, and severe financial and human-capital vulnerability. These adverse conditions have made civil society an integral part of Ukraine's resilience architecture and drive very high civic mobilization, legitimacy, and community embeddedness. Civil society in Ukraine enjoys one of the highest levels of public trust in the region. Volunteer and charitable organizations support defense efforts and war-affected populations; social-service organizations assist internally displaced people, veterans, persons with disabilities, and vulnerable families; local organizations provide humanitarian and community support; while think tanks, watchdog organizations, and professional associations contribute research, policy analysis, monitoring, and reform expertise.

→ Slovakia and Czechia represent a quickly worsening trend in the civic space and the political sphere's attitude toward CSOs.

Both countries feature rapidly deteriorating narrative space and rising contestation of civic space by government actors. Both countries identify a weakened position for civil actors in shaping decision-making and policies, driven by dramatic changes in government attitudes and behavior, including reduced openness to consultation, participation, and consideration of civil society input. Both countries report funding cuts, vilifying rhetoric against "political NGOs", and an attempted foreign-funding registry. At the same time, both countries' civic agency and mobilization potential remain at decent levels despite restrictive external pressures. The Czech Republic is in a better structural and legal framework position than Slovakia. Also, changes in civic space began after the relatively recent government change, so the electoral cycle is just beginning, while Slovakia's is nearing its end. As the Slovak case shows, the moderating power in the deterioration process is the domestic system of checks and balances, played out by the Constitutional Court and lower-level court rulings, and, to some extent, EU institutions.

→ Georgia is the clearest case of systemic civic-space closure and outright hostile conditions, incomparable to those in other countries covered in this report. Restrictive legislation, constraints on foreign funding, state pressure, hostile narratives, weakened participation, and repression of protest reinforce one another. Courts' moderating power is absent, and the EU accession process is ineffective because the Georgian government unilaterally froze its candidacy in 2024. As the author of Georgia's report puts it: "the period from January 2025 to June 2026 is best understood as a period of cumulative pressure rather than one defined by a single decisive event. Legislative changes, administrative measures and increasingly hostile political rhetoric have reinforced one another over time".

2. Methodology

By Boris Strečanský

The period covered is 01/2025 – 06/2026 allowing comparison of both conditions and direction of travel. Key developments during this period were assessed. As this is the first assessment establishing the baseline, subsequent annual assessments will allow for inter-annual comparison.

Standards

The methodological framework is based on a set of 20 standards in four clusters against which the situation on the ground — in practice, not only in the body of law — was assessed.

Standards are organized into four clusters: A) Institutional and Political Environment and Narratives of CSOs, B) Legal and Financial Framework for CSOs, C) Public Engagement and Perceptions towards the Work of CSOs, and D) CSOs as Policy Makers.

- → Group A focuses on the equal treatment of CSOs, their political recognition as partners, the extent of smearing behavior towards CSOs by authorities, the weaponization of state powers and good governance principles against civic space, and the transparency and openness of public institutions.
- → Standards in Group B focus on the degree of freedom to establish and operate CSOs, their protection from arbitrariness, the presence of safe space, the liberality of resourcing, an enabling fiscal environment, and freedom of expression and criticism.

- → Group C standards cover citizens' trust in civil society, pluralistic representation in media, disinformation and smear campaigns; civic participation (volunteering, activism, protests); grassroots mobilization; and the degree of community embeddedness.
- → Group D focuses on assessing the extent to which CSOs influence and shape public policy, including their access to policy-making, the quality of participation, to what extent CSOs can freely conduct advocacy, watchdog, and campaigning to influence policy and opinion, and how the government acts in terms of cooperation with CSOs, what policies it pursues, and to what extent authorities consider the input and provide feedback.

Standards have been developed drawing on the best practices in the field, collecting inspiration from Glopolis (2026), ECNL (2021, 2025) and framework definitions of civic space and its standards as featured in policy documents of the United Nations, European Commission, Fundamental Rights Agency of the EU and the European Civic Forum. The guiding principle in standard formulation has been a broadly liberal perspective, vetted by the project team and country chapter authors.

In the assessment, the set of standards served as a reference point for quantitatively scoring the CSO context across countries using a defined common approach to ensure consistent ratings and comparability.

Scoring Logic

Analytically, each standard defines the desired state in a given area.
In country reports, the standard is compared against a) the formal framework to determine the extent to which the standard is formally met, protected, and enacted; b) the implementation practice i.e., to what extent have rules been applied in reality and to what extent is the standard respected in practice; c) what is the material effect on CSOs and how widespread or substantial is it; d) what is the trend in the area and what supports this assessment.

Each standard is scored using the following scale: 4 = enabling, 3 = mostly enabling, 2 = restrictive leaning, 1 = hostile. It should be noted that scores represent structured expert judgment, not mechanically comparable statistical measurements, as the availability and quality of evidence vary by country and indicator (See Figure 1).

The logic of assessment: from standard to score

Each of the 20 standards is assessed in the same sequence, comparing the situation in law and in practice against the desired state



Figure 1 The logic of assessment

Each country calculated a composite index based on the individual standard indices. The composite index was calculated as a simple average (weight of 1 for each Cluster score).

To ensure inter-country consistency in ratings, the regional team also confirmed the final country ratings after recalibrating them by comparing individual country scores and, where differences were too large, suggesting authors reconsider the rating upward or downward. Nevertheless, in comparative efforts like this, some uncertainty will remain, given the border cases that sometimes occur.

Country reports were written by authors well acquainted with the landscape in their countries using their expertise, desk research, and occasional expert interviews. To ensure the internal quality of the narrative assessment, we used a “second pair-of-eyes” policy with another country expert serving as a “critical friend” familiar with the specific situation in a given country. Finally, the regional team reviewed the country narrative reports for consistency and length.

Limitations

The findings of this report should be read considering five limitations.

First, the assessment is qualitative and expert-led rather than a data-driven monitoring exercise. Scores ultimately rest on the informed judgment of country experts. While common standards, a shared scoring scale and critical-friend review were designed to discipline that judgment, they cannot fully eliminate its subjective element.

Second, several countries underwent rapid political transitions during the period under review, most notably Hungary and the Czech Republic. In such cases, a single score inevitably compresses a trajectory into a snapshot, and may understate how different conditions were at the beginning and the end of the period.

Third, Ukraine presents an exceptional case. Under war and martial law, the assessment must carefully distinguish between restrictions that are necessary and proportionate responses to genuine security threats and those that arbitrarily narrow civic space. That line is not always easy to draw.

Fourth, comparing countries by score carries an inherent risk of conflating very different sources of pressure on civic space. Similar scores may stem from different causes: in some countries, direct actions by governments

and state actors; in others, a less conducive legal and fiscal framework; in others still, broad social polarization. Scores should therefore be read together with the country narratives that explain them.

Last, but not least – this is a baseline report, so trends describe movement within the period, rather than change against prior assessment.

3. Selected Findings

By Boris Strečanský

Country narrative reports offer qualitative insight into civic space conditions in each country. As expert assessments of the same aspects of civic space, they uncover the situation's complexity. Below are several findings from a review of country reports that capture specific tendencies, trends, or behaviors in civic space and illuminate country-level development through an analytical lens. The analysis considers emerging salient features in the regional perspective. It also tries to describe forces that sometimes emerge and can be captured in comparative scoring, and those that sometimes cannot be seen through scoring comparisons but still work beneath the surface.

Diverging trajectories

Reports reveal several divergent civic space trajectories:

- → **Post-authoritarian recovery trajectory:** Poland, Hungary.
- → **Deterioration trajectory from enabling baseline**: Slovakia and, less deeply, Czechia;
- → **Systemic closure:** Georgia.
- → **Unique equilibrium** of pluralistic civic space under exceptional geopolitical, security and resource pressures: Ukraine and Moldova.

Because this assessment excludes other countries in the region, this finding is only preliminary. Other trajectories may go unidentified because of limited coverage.

Universal “Foreign agent” narrative and its limits

The foreign agents/foreign influence narrative frames CSOs’ legitimacy as questionable because of their funding from abroad, which is common in the CEE CSO context. Especially CSOs that engage in public affairs, enter public debate, and express critical views on the incumbent government are targeted through legislation and public communication. There is a continuum of how this narrative has been handled in the countries assessed, ranging from full enactment in Georgia, failed attempts in Slovakia, and successful removal in Hungary, shelved initiatives in the Czech Republic after large protests, failed attempts that were never enacted in Moldova, and no institutional efforts in this direction, as is the case in Ukraine.

Georgia has enacted and enforced this narrative successfully as the only country. After the Law on Transparency of Foreign Influence was adopted in May 2024, organizations receiving at least 20% of their funding from abroad were required to register as “organizations carrying the interests of a foreign power” — a category consisting almost entirely of government-critical, foreign-funded organizations and media. The terminology changed, but the stigmatizing aim remained.

In Hungary, the second effort to enact foreign-funding vilification failed when the “Transparency of Public Life” bill was defeated and withdrawn from the parliamentary agenda. The state media framed CSOs as Soros mercenaries or threats to national sovereignty, principally because they defended minority rights or received support from the Open Society Foundation, USAID or the EU’s CERV program. The Sovereignty Protection Office, Orbán’s Kremlin-style, hand-controlled anti-civil authority, gave the narrative statutory backing, voicing “concerns” about critical CSOs’ independence in annual reports built on fabricated conspiracy claims. Magyar’s government abolished the office in June 2026.

In 2025, Slovakia adopted a so-called “Russian Law” that, among other clauses, used transparency demands as a pretext to impose onerous reporting obligations on the origin of donations. After several months,

the Constitutional Court invalidated the law. As a blanket agenda of illiberal forces in the region, the “foreign agents” template has mixed results, but remains an influential framing that shapes public discourse on CSOs’ legitimacy.

Civic space recovery: Rhetoric and behavioral change are fast and precede institutional and systemic changes

Poland demonstrates that hostile state-CSO relations are reversible: discriminatory funding practices, government-sponsored delegitimization, and political exclusion largely receded following political transition in 2023. Hungary shows the same mechanism at an earlier stage: government rhetoric and access improved quickly after April 2026, but restrictive statutory and administrative structures largely survived; it is too soon to draw any conclusions given the short period since the political change.

However, the reversibility works in both directions as the Slovak case suggests. The institutional and political environment, as well as the behavior of government institutions towards CSOs, changed very quickly and negatively since the current government took office in 2023, but enacting this policy has been less effective, and many aspects of the legal and fiscal framework remain unchanged. The deteriorating trend is often driven by intimidation, economic (defunding decisions) and administrative (audits, inspections) pressure, and legal uncertainty, rather than by structural and regulatory changes.

The gap between the formal and lived

Findings from this assessment often highlight the gap between what is on the books and lived reality. This duality of the formal and informal is common in the region and has persisted as a cultural trait since communism, when official uniformity was an overarching dogma. But that would not explain it all.

In several countries, constitutional rights, laws governing association, consultation mechanisms and other elements of democratic infrastructure remain substantially intact, while the conditions under which CSOs actually operate have become less enabling (Czechia, Slovakia). The formal existence of rights and institutions is therefore an insufficient indicator of the quality of civic space.

At the same time, the distinction between formal and lived civic space should not be overstated. Where political conditions permit, practical deterioration can migrate into the formal framework itself. Georgia represents the clearest case, where restrictive practice and restrictive legislation increasingly reinforce each other. Developments elsewhere suggest this process is a continuum rather than a dichotomy. Delegitimizing narratives mark the start of a sequence of steps that lead to exclusion, unequal treatment, and administrative pressure through the weaponization of state institutions. Regulatory framework restrictions usually follow once power is consolidated enough to resist domestic and international mechanisms for moderating uncivil action.

This cleavage has practical and political logic. Restricting civic space through administrative practice, selective enforcement, exclusion from consultation or public funding, hostile rhetoric, burdensome oversight, or informal pressure can be faster and politically less costly than changing the underlying legal framework. It also allows governments to maintain the language and institutional appearance of democratic governance while narrowing civic space in practice. The assessment consequently points to the importance of examining not only what the rules provide, but how they are implemented and what material effects they produce for CSOs.

The importance of courts and other countervailing institutions

CSOs increasingly turn to other accountability channels to defend civic space. These include constitutional review, administrative and strategic litigation, Public Rights Defender's institutions, European institutions and, ultimately, public mobilization. The assessment suggests that these countervailing institutions often decide whether pressure on civic space results in lasting restriction or is contained.

In Slovakia civil society's extensive objections to the 2025 "Russian Law" were ignored in the legislative process; major provisions were rewritten just before the parliamentary vote. The Constitutional Court then accepted those objections, invalidating the law's donor-disclosure and reporting regime along with the fee and deadline restrictions added to the Freedom of Information Act. The government has increasingly been made to listen through courts, the media and mobilization rather than through consultation. The limits of judicial protection are also visible, however. The Prime Minister publicly stated that the Court "would no longer be able to protect NGOs", and the executive responded to the ruling with a cross-agency inspection regime in February 2026. The restriction moved from legislation to administrative practice, where judicial review reaches more slowly.

Poland shows the importance of rebuilding institutional safeguards after periods of political misuse. The government established a commission to investigate the previous administration's repression of civil society, and its chair was later elected Commissioner for Human Rights. Public media reform ended sustained anti-CSO narratives, and transposing the EU Anti-SLAPP Directive added procedural protection for public participation.

Georgia shows the opposite: the judiciary is politicized and the former Public Defender is targeted by smear campaigns. The countervailing institutions have lost their protective function, and restrictive practice and legislation go hand in hand.

EU leverage

The European Union emerges from the assessment as the most consequential external force shaping civic space in the region. Its influence, however, depends on how much a government values what the EU offers.

In the candidate countries, the accession process has worked as a structural driver of state–CSO cooperation. In Moldova, the accession framework produced sectoral roadmaps, a new Public Participation Law drafted under the State Chancellery, and new dialogue formats such as a Parliament–CSO conference. Accession conditionality is thus building a cooperation architecture that domestic politics alone had not delivered.

In member states, EU leverage works through different channels: law, courts and money. In Slovakia, EU funding rules, including the partnership principle for cohesion funds and direct programs such as CERV, gave CSOs a floor of access and resources that national defunding could not remove. The European Commission's rule-of-law reporting and the Venice Commission's opinions strengthened the arguments later upheld by the Constitutional Court. In Hungary, the CJEU ruling on the child-protection law and the long freeze of EU funds kept the illiberal model under sustained external constraint.

Georgia marks the limit of this leverage. Georgian Dream no longer treats EU membership as a goal worth the cost of compliance. EU leverage is therefore strong but conditional: it works where governments want the European trajectory or are bound by European law, and weakens sharply where a regime has decided to let the EU go.

Pressure breeds resistance and resilience.

A consistent and somewhat counter-intuitive pattern across the assessed countries is that pressure on civic space does not simply produce retreat. In many cases it triggers mobilization, solidarity and new forms of self-organization.

In Slovakia, government defunding, estimated at €15–16 million in 2024–2025, and hostile rhetoric were met by individual donations and crowdfunding for affected organizations. Platforms such as Donio.sk, Darujme.sk and Startlab.sk channel an estimated €15–20 million a year from individual donors. The pressure also strengthened sectoral coordination: the Platform for Democracy now links more than 90 organizations. Street protests against the NGO bill and the government's foreign-policy line became the largest since 2018, reaching more than 40 towns. In Czechia, roughly 250,000 people gathered at Letná in spring 2026, the largest anti-government demonstration since 2019. The mobilization was explicitly framed as avoiding the Hungarian and Slovak trajectories and helped shelve the foreign-agents initiative. In Georgia, protests had persisted for almost two years despite fines that rose to 35 times the monthly subsistence minimum, administrative detention and criminal convictions.

Resilience also takes non-confrontational forms. In Ukraine, civic energy is channeled into service, mutual aid and community organizing: 73% of surveyed CSOs operate entirely through volunteers, and trust in volunteer organizations stands at about 80%. That trust gave citizens a legitimate channel for collective action when the anti-corruption agencies came under threat in July 2025. In Hungary, the Tisza Islands, a nationwide network of local volunteer groups, showed how civic self-organization at the community level can rebuild participation after years of single-party-state-dominated public life.

These examples of agility in adversity point to civil society's agency as a key factor in the vitality of civic space. That agency has limits. It depends heavily on volunteer energy and crisis-driven mobilization, and it can be exhausted, as Georgia's increasingly paralyzed, but admirable sector shows.

Resource fragility structurally salient in candidate countries

Resource fragility emerges as a particularly important civic-space vulnerability in Ukraine and Moldova. In both candidate countries, civil society remains legally free to receive foreign resources, but the professional CSO sector depends substantially on international donors while domestic philanthropy, institutional public funding and other sustainable sources remain comparatively weak.

Ukraine has no percentage-designation mechanism. Moldova's 2% designation faces recurring proposals to dilute it, and tax incentives for giving remain limited. In both countries, anti-money-laundering and beneficial-ownership rules are applied without a risk-based approach, adding costs and friction for banks. By contrast, Slovakia's tax designation system survived political pressure and still generates over €100 million a year. CSOs in the candidate countries do not have this buffer. The paradox is that the countries where civil society is most needed to deliver EU-accession reforms are those where its financial base is least secure.

The interruption of major U.S. assistance in 2025 provided a stress test. In Ukraine, only around 8% of surveyed CSOs reported receiving state or local-budget funding, while international grants remain the principal external resource for professional organizations. Following the U.S. funding disruption, 22.3% of active CSOs reported negative effects and 57% of affected organizations were unable to compensate for the lost resources. European funding absorbed part of the shock - the EU reported more than €200 million committed to Ukrainian CSOs since 2022. However, replacing one external donor with another does not remove the underlying concentration risk. The same structural weakness is evident in Moldova. The abrupt withdrawal of U.S. development assistance exposed both the sector's dependence on foreign donors and the limited development of domestic philanthropy. The vulnerability is particularly acute outside Chișinău, where local organizations have fewer trained staff, weaker

access to funding and equipment, and less organizational capacity. Donor-supported programs can produce strong local results, but their sustainability after external support ends remains uncertain.

Resource vulnerability is not absent from EU member states—Hungary, Slovakia, Czechia and Poland all show problems related to public funding, philanthropy, financial reserves or politicization of resource allocation. The difference is one of degree and structure rather than presence or absence.

CSOs in policymaking face difficulties

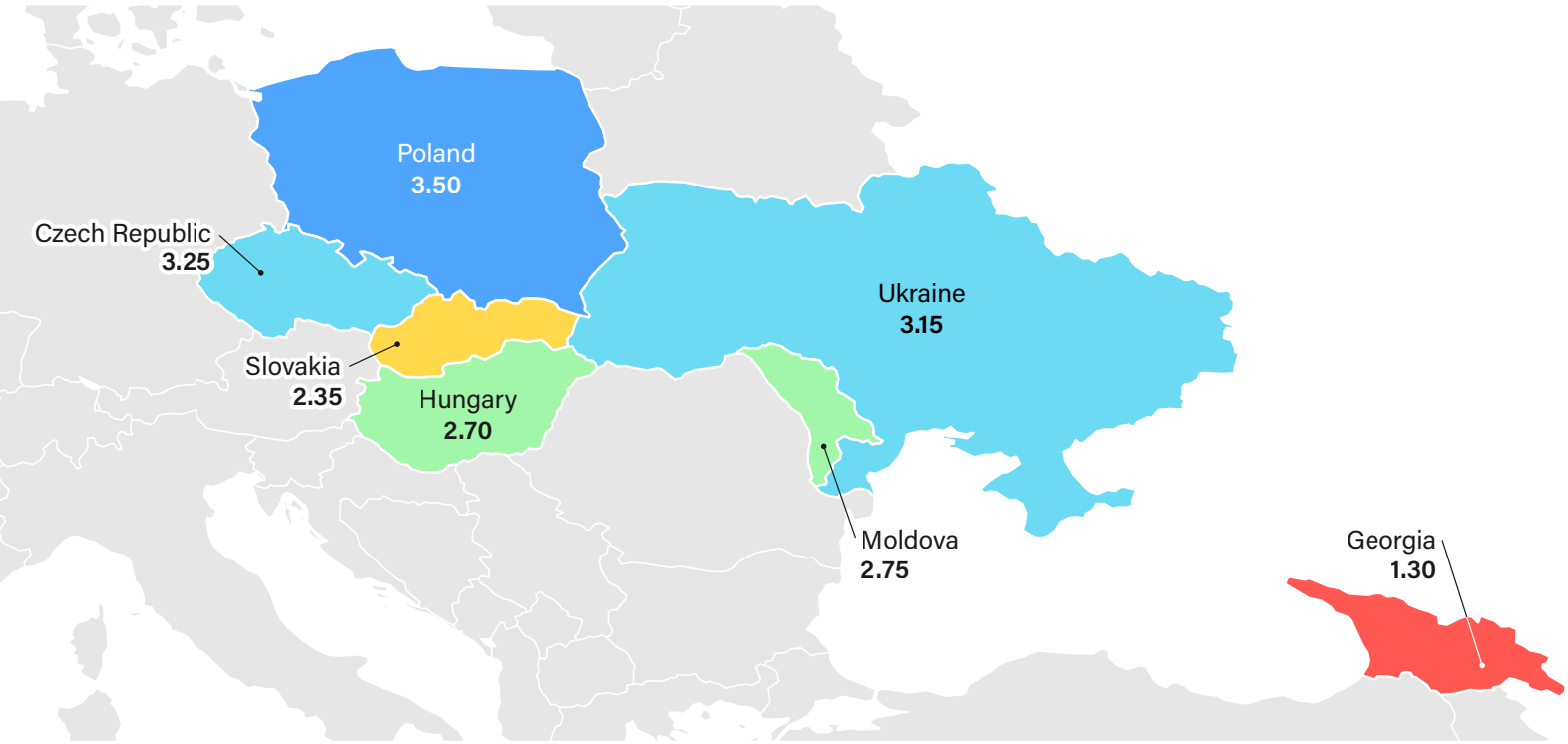
Overall, the dimension of the ability of CSOs to influence and shape public policy is one of the most compromised and the findings suggest it is a structural feature relevant for the whole region. Poland, Czechia, Moldova, Georgia and Ukraine indicate their weakest dimension is participation in policymaking, and Slovakia and Hungary the second weakest.

The weakest components of the CSO-government relationship in this dimension are governments' failing ability to listen, conduct timely consultations, and implement policies that encourage cooperation. Poland's relations with the government improved considerably, but implementation of commitments and actual influence remain uneven. In Slovakia, the central government's responsiveness is extremely low. In Georgia, the government's outright hostility is an exemplary case of this trend.

In the assessment, public authorities are failing to give CSOs and public input genuine consideration and do not provide feedback on how citizens' contributions affected the final decision. Similarly, public consultations are underperforming across the region: fast-track legislative procedures are becoming the norm, invitations for consultations are often selective, information is scarce, and explanations for why CSOs' proposals are accepted or rejected are weak.

Standard	Poland	Czechia	Ukraine	Moldova	Hungary	Slovakia	Georgia	Standard index
Cluster A	**3,60**	**3,20**	**3,00**	**3,00**	**2,60**	**1,80**	**1,20**	**2,72**
A1 Equal treatment	4	3	3	3	3	2	1	2,8
A2 Political recognition as partners	3	3	4	3	3	2	1	3,0
A3 Refrained authorities from smearing	4	3	3	3	3	1	1	2,6
A4 No weaponization of state powers	4	4	3	3	2	2	1	2,8
A5 Transparent and open public institutions	3	3	2	3	2	2	2	2,4
Cluster B	**3,80**	**4,00**	**3,20**	**3,00**	**3,00**	**2,80**	**1,40**	**3,20**
B1 Free establishment and operation	4	4	4	4	3	3	2	3,6
B2 CSOs enjoy a safe space	4	4	3	3	3	3	1	3,2
B3 Liberty of resourcing	4	4	3	3	3	2	1	3,0
B4 Enabling fiscal environment	3	4	3	2	3	3	2	3,0
B5 Free expression of criticism	4	4	3	3	3	3	1	3,2
Cluster C	**3,60**	**3,60**	**3,60**	**2,60**	**2,60**	**2,80**	**1,60**	**3,04**
C1 Citizens trust	3	3	4	3	3	3	2	3,2
C2 Present in media	4	3	3	2	2	2	2	2,4
C3 Free engagement	4	4	4	3	3	3	1	3,4
C4 CSOs embedded in communities	3	4	4	2	3	3	2	3,2
C5 Freedom of assembly	4	4	3	3	2	3	1	3,0
Cluster D	**3,00**	**2,20**	**2,80**	**2,40**	**2,60**	**2,00**	**1,00**	**2,40**
D1 Decision-making participation	3	2	3	3	2	2	1	2,4
D2 Timely consultations	3	2	2	2	2	2	1	2,0
D3 Policies for cooperation	3	2	3	3	3	2	1	2,6
D4 Free advocacy	3	3	3	2	3	3	1	2,8
D5 Government listens	3	2	3	2	3	1	1	2,2
Overall Country Composite Index	**3,50**	**3,25**	**3,15**	**2,75**	**2,70**	**2,35**	**1,30**	
Country Trend	↗	↘	↔	↗	↔	↘	↘	

Heatmap



1.00–1.49 – Hostile

Systematic obstacles, political pressure and serious restrictions on independent civil society.

1.50–1.99 – Restrictive Leaning

A predominantly restrictive environment, with some remaining opportunities for civic engagement.

2.00–2.49 – Mixed – Restrictive Leaning

A mixed environment in which restrictive conditions outweigh enabling factors.

2.50–2.99 – Mixed – Enabling Leaning

A mixed environment in which enabling conditions outweigh remaining restrictions.

3.00–3.49 – Mostly Enabling

Generally favourable conditions, although certain barriers and vulnerabilities appear.

3.50–4.00 – Enabling

Strong protections and favourable conditions for independent civil society to operate and participate.

Note: The heat map uses a more granular colour scale to visualise differences in composite scores. While the methodology applies four assessment categories to individual standards, the overall country composite index is calculated as the arithmetic mean of the four cluster scores and may therefore fall between these categories. The additional colour distinctions serve solely to illustrate and interpret the results; they do not constitute additional assessment categories or a separate ranking system.

Civic Space Report 2025/2026

Poland

Country Score: **Enabling**

Country Trend: ↗

3.50



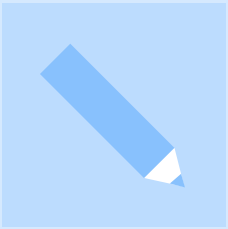
Cluster A: 3.60
A1 Equal treatment: 4
A2 Political recognition as partners: 3
A3 Refrained authorities from smearing: 4
A4 No weaponization of state powers: 4
A5 Transparent and open public institutions: 3



Cluster B: 3.80
B1 Free establishment and operation: 4
B2 CSOs enjoy a safe space: 4
B3 Liberty of resourcing: 4
B4 Enabling fiscal environment: 3
B5 Free expression of criticism: 4



Cluster C: 3.60
C1 Citizens trust: 3
C2 Present in media: 4
C3 Free engagement: 4
C4 CSOs embedded in communities: 3
C5 Freedom of assembly: 4



Cluster D: 3.00
D1 Decision-making participation: 3
D2 Timely consultations: 3
D3 Policies for cooperation: 3
D4 Free advocacy: 3
D5 Government listens: 3

4. Civic Space Report – Poland

By Milosz Hodun

Introduction

This report assesses the enabling environment for civil society organisations (CSOs) in Poland during 2025–2026. The reporting period follows the change of government in late 2023, which ended a period in which independent CSOs were often marginalised, stigmatised and pressured by public authorities. The assessment therefore describes an environment that is markedly more open than before, but one in which many reforms promised by the government remain unfinished. Each standard is described in terms of its legal framework, its application in practice and its material consequences for CSOs, followed by a trend assessment and a score. The scores are summarised in a table at the end of the narrative, followed by concluding remarks.



Cluster A – Institutional and Political Environment and Narratives of CSOs

How do political institutions interact with and portray CSOs?

A1 – Equal treatment

Standard. *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

Poland's legal framework provides for equal treatment of CSOs. The Constitution guarantees freedom of association, while the rules governing the establishment, registration and operation of associations and foundations are generally applied without discrimination based on political views or advocacy activities.

The situation has improved markedly since the change of government in late 2023. Under the previous government, public institutions frequently favoured government-aligned organisations, including GONGOs, in the allocation of public funding, access to decision-makers and participation in consultative mechanisms. Independent and government-critical organisations reported discriminatory treatment and exclusion from public support. During 2025–2026, this pattern largely ceased. Public authorities generally abandoned the previous practice of privileging

politically loyal organisations, and there were no comparable reports of systematic discrimination against CSOs because of their criticism of government policies.

The change has contributed to a more level playing field for civil society. Individual controversies over grant decisions or cooperation with public authorities continue to occur, but they do not appear to constitute a systemic pattern of discrimination. The broader improvement is consistent with the V-Dem Democracy Report 2025 (Varieties of Democracy Institute, 2025), which identified Poland among the countries in which democratic decline was reversed and classified it among the democratizing countries, although the report's assessment was based on data through 2024.

Trend. Improving – the favouritism towards government-aligned organisations that marked the previous period has largely ceased.

Score 4 – Enabling: Equal treatment is broadly ensured in law and practice, with only isolated controversies and no systemic discrimination.

A2 – Political recognition as partners

> ***Standard.*** *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

Following the 2023 parliamentary elections, Prime Minister D. Tusk repeatedly presented a strong and independent civil society as a cornerstone of liberal democracy and pledged to rebuild trust between the state and CSOs after years of confrontation. The new government created the office of the Minister for Civil Society and established thematic working groups bringing together public administration and NGOs to develop proposals for reform. It also established a Government Commission

for Investigating Repression against Civil Society under the previous administration. Its chair, S. Gregorczyk-Abram, was subsequently elected Commissioner for Human Rights.

Relations between public authorities and CSOs have consequently become more cooperative. Independent organisations are once again treated as legitimate interlocutors rather than political adversaries, and government rhetoric towards the sector has become markedly more respectful. The 2026 Civil Society Organizations Resilience Index (Pazderski, 2026) also points to growing recognition of the importance of CSOs by public institutions, while stressing the need to strengthen partnerships with local authorities, business and communities.

The change in political recognition has not, however, been matched by the full implementation of the government's earlier commitments. As F. Pazderski noted in 2026 (Pazderski, 2026), many of the pledges made before the 2023 elections—including reforms to civic dialogue, public consultations and the financing framework—remain unfulfilled. The dedicated ministerial position was also abolished in the 2025 government reshuffle. CSOs therefore have substantially greater political recognition than under the previous government, but this recognition is not yet fully embedded in durable institutional and legislative arrangements.

Trend. Improving – political recognition has grown markedly, but it is not yet embedded in durable institutional arrangements.

Score 3 – Mostly enabling: Recognition is substantially stronger than before, but unfulfilled pledges and the abolished ministerial post keep it from being fully secured.

A3 – Refrained authorities from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

Poland's legal framework does not provide a basis for public authorities to stigmatise or discriminate against CSOs because of their activities or sources of funding. International cooperation and foreign funding remain lawful.

The most significant change during 2025–2026 has been in official political rhetoric. Under the previous government, independent organisations, particularly those working on the rule of law, human rights, migration, women's rights and LGBTQI+ equality, were regularly portrayed by senior politicians and state-controlled media as politically biased, acting against the national interest or serving foreign agendas (Raport Komisji ds. represji..., 2025), and some abstained from advocacy being afraid of losing funds (Gumkowska, Charycka, Bednarek, 2022). This pattern has largely disappeared from government communication. The reform of public media also removed much of the sustained anti-CSO rhetoric that had characterised parts of public broadcasting.

Hostile rhetoric towards CSOs remains present in political debate, particularly among opposition politicians and in some partisan media. Organisations working on migration, LGBTQI+ rights, reproductive rights and other politically contentious issues continue to face criticism and online attacks. These attacks, however, are not promoted by state institutions and there have been no systematic attempts by the government to portray international cooperation by Polish CSOs as illegitimate foreign interference.

Trend. Improving significantly – smearing has largely disappeared from government communication, while hostile rhetoric persists in opposition politics and partisan media.

Score 4 – Enabling: State authorities no longer stigmatise CSOs, and the remaining hostile rhetoric is not promoted by state institutions.

A4 – No weaponization of state powers and good governance principles

> ***Standard.*** *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, emergency measures, or principles such as transparency and fiscal due diligence — selectively or disproportionately to pressure CSOs because of their activities or views.*

Poland's legal framework provides safeguards against arbitrary state interference with CSOs, including constitutional guarantees of freedom of association and judicial review of administrative decisions. During 2025–2026, the government's approach to civil society differed substantially from that of the previous administration.

The most significant institutional development was the establishment in 2025 of the Commission for Investigating Mechanisms of Repression against Civil Society Organizations and Civic Activists in 2015–2023. Its work documented the use of legal and administrative instruments under the previous government to discourage civic activism and create a chilling effect. During the assessment period, there was no evidence that comparable practices were being systematically employed against organisations critical of public authorities.

The restructuring of the National Institute of Freedom[1] and changes to public funding mechanisms also reduced opportunities for politically motivated administrative interference. At the same time, institutional safeguards against future abuse remain incomplete. The Civil Society

Organizations Resilience Index (Pazderski, 2026) stresses the importance of stronger structural guarantees to prevent legal and administrative instruments from again being used to create uncertainty or pressure for CSOs.

Trend. Improving – past repressive practices have been documented and are no longer applied systematically, though safeguards against their return remain incomplete.

Score 4 – Enabling: No systematic weaponization of state powers was observed, but structural guarantees against future abuse are still lacking.

A5 – Transparent and open public institutions

> ***Standard.*** *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

Poland has a well-established legal framework guaranteeing transparency of public administration. The Constitution guarantees the right to obtain information on the activities of public authorities, while the Act on Access to Public Information provides broad access to official documents and information held by public institutions. CSOs make extensive use of these provisions in advocacy, monitoring and litigation.

During 2025–2026, the framework remained stable and several developments strengthened institutional transparency. The implementation of the Central Register of Public Contracts improved access to information on government spending, while digital publication of information and interventions by the Commissioner for Human Rights supported transparency. Another definite point in the current administration's favor is its openness to holding public hearings for candidates to senior state positions. Thanks to the persistence of CSOs, hearings were held for,

among others, candidates for head of the Supreme Audit Office (NIK), the Office of Electronic Communications (UKE) and the state commission on AI. A meeting between CSOs and candidates for the Commissioner for Human Rights (RPO) was also organized.

In practice, however, access to information continues to fall short of the legal standard. Watchdog Poland's 2025 report (Sieć Obywatelska Watchdog Polska, 2025) found no systemic breakthrough, pointing to inconsistent application of access-to-information rules, lengthy proceedings and continued reliance on broad interpretations of concepts such as "processed information" to refuse disclosure. The organisation also identified shortcomings in legislative transparency, access to environmental information and rules governing the transparency of official social-media accounts. Poland has not ratified the Tromsø Convention and has not joined the Open Government Partnership (European Commission, 2025).

Trend. Stable, with some progress – legal guarantees are unchanged and new transparency measures have been introduced, but implementation problems persist.

Score 3 – Mostly enabling: A strong legal framework is undermined by inconsistent practice, lengthy proceedings and refusals to disclose information.



Cluster B – Legal and Financial Framework for CSOs

What formal conditions shape CSO operations and sustainability?

B1 – Free establishment and operation

> ***Standard.*** *Everyone can freely establish, join or participate in a CSO; CSOs determine their own objectives; registration is clear, simple, quick and inexpensive. The state does not interfere in internal governance, and monitoring or reporting is defined by law, proportionate and not onerous.*

Poland provides a strong legal basis for the establishment and operation of CSOs. Freedom of association is guaranteed by the Constitution and implemented primarily through the Law on Associations and the Foundations Act. Individuals are generally free to establish, join and participate in associations and foundations, define their objectives, determine their internal governance and cooperate with domestic and international partners. Foreign nationals residing in Poland may form and join associations under the same provisions as Polish citizens, while non-residents may join associations where their statutes permit it.

Registration procedures are generally accessible and inexpensive and are subject to judicial oversight. The state does not interfere in the internal governance of CSOs beyond supervisory mechanisms provided by law. The European Commission's 2025 Rule of Law Report (European Commission, 2025) noted further progress in improving the framework in which civil society operates.

Practical obstacles nevertheless remain. The Civic Space Report 2026 (European Civic Forum, 2026) identifies registration procedures, reporting obligations and other administrative requirements as a disproportionate burden for some smaller organisations. Routine supervision is generally conducted within the legal framework, but organisations continue to report bureaucratic complexity and inconsistent administrative practice. The report also identifies specific barriers affecting some groups: transgender people whose legal documents do not reflect their gender identity may be required to disclose personal data during registration, creating risks to privacy and exposing them to discrimination.

Trend. Stable, with some incremental improvements – the strong legal basis is unchanged, and the European Commission noted further progress in the framework for civil society.

Score 4 – Enabling: Establishment and operation are well protected in law and practice, and the remaining administrative burdens mainly affect smaller organisations and specific groups.

B2 – CSOs enjoy a safe space and protection from arbitrariness

Standard. *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

The operating environment for CSOs improved significantly during 2025–2026. The Civic Space Report 2026 concludes that the systematic political pressure experienced by many organisations under the previous government substantially diminished. CSOs were no longer exposed to comparable politically motivated administrative measures or systematic misuse of public institutions aimed at restricting their activities. The European Commission likewise noted progress (European Commission, 2025) in the framework for civil society, including reforms to public funding mechanisms and renewed dialogue between public authorities and CSOs.

This improvement is also reflected in Freedom House's Freedom in the World 2026 (Freedom House, 2026), which rates Poland as "Free" with a score of 82/100. At the same time, Freedom House assigns Poland 3/4 for freedom of NGOs, noting that organisations generally operate freely but that restrictions affecting migration-related groups and humanitarian activists remain a concern.

Some proceedings initiated under the previous administration remained pending, and civil society experts continue to call for stronger institutional safeguards against future abuses. Organisations working on migration and humanitarian assistance also continue to face operational difficulties, although these arise primarily from the wider legal and political context rather than arbitrary interference with their legal status.

Trend. Improving significantly – systematic political pressure on CSOs has substantially diminished.

Score 4 – Enabling: CSOs generally operate freely and safely, with remaining difficulties limited to migration-related and humanitarian organisations and to unresolved legacy proceedings.

B3 – Liberty of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

Polish CSOs enjoy broad legal freedom to seek, receive and use financial resources from domestic, European and international sources, including foreign private donors. Receiving foreign funding does not entail additional registration or reporting requirements. CSOs participate extensively in EU programmes and cross-border partnerships and may generate income through economic activities within the limits established by law.

The political environment surrounding public funding has nevertheless changed significantly since 2023. The National Institute of Freedom was reformed, including the replacement of its previous leadership through an open recruitment process and the creation of a new council with greater representation of civil society. Funding procedures became more transparent and merit-based. These changes addressed concerns that, under the previous government, state resources had disproportionately benefited organisations aligned with the governing majority.

The principal remaining challenge is financial sustainability rather than formal access to resources. The Civil Society Organizations Resilience Index (Pazderski, 2026) finds that only around one quarter of Polish organisations have financial reserves sufficient to withstand periods of crisis. Many remain dependent on short-term public project funding, while philanthropy and income from economic activity remain relatively underdeveloped. Funding mechanisms provide limited support for institutional development and core operating costs, particularly affecting smaller organisations and those outside major urban centres.

Trend. Improving – public funding mechanisms have become more transparent and merit-based, while financial sustainability remains a challenge.

Score 4 – Enabling: Access to resources is legally unrestricted and fairer than before, although weak financial sustainability remains a persistent concern.

B4 – Enabling fiscal environment

Standard. *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures, and sanction regimes, are applied to CSOs proportionately and on a risk basis.*

Polish CSOs operate within a generally favourable fiscal framework. They can benefit from the 1.5% personal income tax designation and exemptions from certain taxes for statutory activities. Individuals and businesses can claim tax deductions for charitable donations, while CSOs are generally exempt from corporate income tax on income used for statutory purposes. During 2025–2026, there were no indications that AML, CFT or sanctions regimes were systematically misused to restrict CSOs or their access to banking services.

The government nevertheless continued to address legal and administrative complexity affecting the sector. The Working Group on Legal Simplification for NGOs worked on reforms intended to modernise the legal and fiscal framework and reduce unnecessary administrative burdens. Proposals included clarification of the CIT exemption for CSOs, more flexible rules concerning own contributions to publicly funded projects and simplified reporting requirements for smaller organisations. Several of these reforms remained at the proposal stage during the assessment period.

The fiscal environment also remains insufficiently supportive of long-term financial sustainability. Existing tax incentives have not generated a strong culture of private philanthropy, while many organisations remain dependent on public project grants and lack stable institutional funding. CSOs and sector experts have called for broader measures supporting individual and corporate giving and simplifying tax rules applicable to CSOs (Schimanek, T., 2025).

Trend. Stable – the favourable framework is unchanged, and simplification reforms have so far remained at the proposal stage.

Score 3 – Mostly enabling: The fiscal framework is generally favourable, but pending reforms and weak incentives for private giving limit its enabling effect.

B5 – Free expressions of criticism

> ***Standard.*** *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

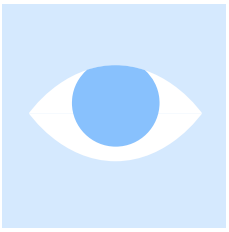
The Constitution guarantees freedom of expression, including the right of CSOs, activists and journalists to criticise public authorities and participate in public debate. During 2025–2026, organisations remained free to conduct campaigns, publish reports, participate in demonstrations and cooperate with domestic and international media.

The Civic Space Report 2026 (European Civic Forum, 2026) notes that the hostile climate experienced by many organisations under the previous government diminished considerably. Public debate remains highly polarised, however, and organisations working on migration, women's rights and LGBTQI+ equality continue to face criticism from political actors and online harassment. Such attacks no longer form part of a systematic government strategy to delegitimise civil society. Freedom House's Freedom in the World 2026 (Freedom House, 2026) similarly assesses freedom of expression in Poland at 3/4 and media freedom at 3/4, indicating that the improvement has not removed all structural problems affecting the wider environment for public criticism and independent media.

An important legal development was the adoption of legislation implementing the EU Anti-SLAPP Directive. The new framework introduces procedural safeguards against manifestly unfounded lawsuits intended to silence public participation.

Trend. Improving – the hostile climate of the previous period has diminished considerably, and new anti-SLAPP safeguards have been introduced.

Score 4 – Enabling: Freedom to criticise is protected and no longer subject to systematic state pressure, despite polarisation and online harassment.



Cluster C – Public Engagement and Perceptions towards the Work of CSOs

How are CSOs perceived, and how do citizens engage with them?

C1 – Citizens' trust

> ***Standard.*** *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

CSOs are generally recognised in Poland as legitimate contributors to public life. Their role during successive crises, including the humanitarian response following Russia's full-scale invasion of Ukraine and responses to natural disasters, has strengthened recognition of their social importance.

The Civil Society Organizations Resilience Index identifies social trust and public recognition as one of the weaker dimensions of Polish civil society's resilience (Pazderski, 2026). Many organisations enjoy strong legitimacy within the communities and groups they serve, but the sector as a whole continues to face limited public visibility, relatively weak engagement with citizens and political polarisation. The report identifies stronger communication, greater transparency and longer-term relationships with communities as important for building public confidence.

Trend. Stable – CSOs are broadly recognised as legitimate, but public trust continues to be uneven.

Score 3 – Mostly enabling: CSOs enjoy legitimacy, but limited public visibility and weak engagement with citizens hold trust back.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

CSOs have broad access to a diverse media environment, including independent national, regional and local outlets as well as specialised civic and non-profit media. During 2025–2026, organisations continued to participate in public debate through traditional media, online platforms and social media without legal or administrative restrictions.

The environment for media representation improved following the change of government. The Civic Space Report 2026 (European Civic Forum, 2026) notes that systematic delegitimisation of independent CSOs in public discourse has largely ceased. The reform of public media ended the sustained anti-CSO narratives that had characterised parts of public broadcasting under the previous government, allowing civil society actors to regain visibility in mainstream debate.

Media pluralism remains affected by broader political polarisation. Issues such as migration, LGBTQI+ rights and reproductive rights continue to generate strongly polarised coverage, particularly in partisan media. CSOs active in these areas remain targets of criticism from some commentators and opposition-aligned outlets. These attacks reflect continuing political and editorial polarisation rather than coordinated state efforts to marginalise independent CSOs.

Trend. Improving – systematic delegitimisation of CSOs in public media has largely ceased, although polarised coverage persists in partisan outlets.

Score 4 – Enabling: CSOs have broad access to a diverse media environment, and the remaining negative coverage reflects political polarisation rather than state action.

C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.*

Citizens in Poland are free to engage in civic activities, including volunteering, charitable giving, public advocacy, peaceful protest and participation in CSOs. The legal framework protects freedom of association, assembly and expression, and there were no legislative measures during 2025–2026 restricting citizens' ability to participate in civic life or support CSOs.

Civic participation nevertheless continues to be affected by political and social polarisation. Individuals active on migration, women's rights and LGBTQI+ equality may encounter hostile public debate, online harassment or criticism from political actors and partisan media. These pressures do not amount to systematic restrictions imposed by public authorities and have not prevented citizens from participating freely in civic activities.

Trend. Stable – there were no restrictive measures on civic participation, and polarisation remains the main pressure.

Score 4 – Enabling: Citizens engage freely, and pressures on those active on contentious issues do not amount to restrictions imposed by public authorities.

C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.*

CSOs remain deeply involved in addressing local social needs and continue to mobilise volunteers and grassroots support through community-based activities. Their role during the humanitarian response to Russia's invasion of Ukraine and in responses to natural disasters demonstrated their capacity to mobilise citizens, volunteers and local communities (Mikołajczak, P., 2025). Cooperation between NGOs, local governments, businesses and informal civic initiatives remains an important feature of Poland's civic landscape.

Conditions for cooperation with public institutions improved during 2025–2026 as political pressure on civil society diminished and dialogue with public authorities was restored. At the same time, the Civil Society Organizations Resilience Index (Pazderski, 2026) identifies community embeddedness and social connectedness as among the weaker dimensions of Polish civil society. Many CSOs rely on narrow groups of supporters, have limited long-term relationships with local communities and businesses, and remain insufficiently integrated into broader cross-sector networks. The report therefore stresses the importance of strengthening local partnerships and volunteer engagement and improving communication with citizens.

Trend. Stable overall – conditions for cooperation with public institutions have improved, but community embeddedness remains one of the weaker dimensions.

Score 3 – Mostly enabling: CSOs demonstrate strong mobilisation capacity, but narrow support bases and limited long-term links with communities restrain their embeddedness.

C5 – Freedom of assembly

> ***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

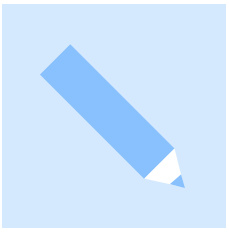
The right to freedom of peaceful assembly is guaranteed by the Constitution and protected by the Law on Assemblies. During 2025–2026, individuals and CSOs were able to organise and participate in demonstrations, protests and public gatherings without undue legal or administrative restrictions. Organisations continued to mobilise publicly around issues including the rule of law, migration, women's rights, environmental protection and European integration. Large-scale demonstrations took place throughout the period without evidence of systematic interference by public authorities.

The overall environment for exercising freedom of assembly improved following the change of government. The Civic Space Report 2026 (European Civic Forum, 2026) describes Polish civic space as significantly more open than under the previous government, while CIVICUS (CIVICUS, 2026) upgraded Poland's civic-space rating from "Obstructed" to "Narrowed" in recognition of progress in civic freedoms. Freedom House's Freedom in the World 2026 (Freedom House, 2026) also rates freedom of assembly at 3/4, confirming that the right is generally respected while indicating that some restrictions and concerns remain.

Some structural concerns remain. CSOs continue to advocate amendments to the Law on Assemblies, particularly provisions concerning so-called cyclical assemblies, which have long been criticised for granting preferential treatment to certain recurring demonstrations.

Trend. Improving – civic space has become significantly more open, as reflected in the upgraded CIVICUS rating.

Score 4 – Enabling: The right of assembly is generally respected in practice, with the remaining concerns limited to specific provisions of the Law on Assemblies.



Cluster D – CSOs as Policy Makers

To what extent do CSOs influence and shape public policy?

D1 – Right to participate in decision-making including in the policy cycle

> ***Standard.*** *Everyone has the right to participate in decision-making, and authorities use mechanisms ensuring meaningful public and CSO participation, with redress for non-compliance, across the whole policy cycle and without discrimination.*

Poland provides a solid legal basis for CSO participation in public decision-making. Freedom of association and participation in public affairs are constitutionally protected, while reforms adopted under the EU Recovery and Resilience Facility strengthened consultation requirements in the Council of Ministers and the Sejm. Since late 2024, a dedicated parliamentary consultation platform has made legislative proposals and consultations more accessible. The European Commission's 2025 Rule of Law Report (European Commission, 2025) noted strengthened consultation rules and further progress in improving the framework for civil society.

During 2025–2026, CSOs participated in policy development through parliamentary committees, ministerial working groups, advisory bodies and public consultations, and continued to engage in European and international advocacy without retaliation. The institutional framework therefore provides multiple channels through which organisations can participate in the policy cycle.

The effectiveness of participation remains uneven, particularly beyond the initial stage of policy development. CSOs report significant differences between ministries and policy areas in their opportunities to influence implementation and monitoring. Access to public information also remains an obstacle to effective participation, as noted repeatedly by Watchdog Poland (Sieć Obywatelska Watchdog Polska, 2025).

Trend. Improving, mainly thanks to procedural and institutional reforms.

Score 3 – Mostly enabling: Multiple channels of participation exist, but the influence of CSOs is uneven beyond the initial stage of policy development.

D2 – Timely consultations and equal participation

> ***Standard.*** *Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible, so that grassroots and under-resourced CSOs are not excluded due to limited means.*

The legal framework for public consultation improved during the assessment period. Amendments to the Rules of Procedure of the Council of Ministers and the Sejm strengthened consultation requirements and limited the possibility of adopting legislation without prior consultation, subject to defined exceptions. Digital consultation tools have also improved access to legislative processes.

In practice, however, consultations remain inconsistent. Civil society monitoring (Batory Foundation, 2025) shows that some draft legislation continues to bypass public consultation, while other consultations are launched late, provide insufficient time for substantive input or fail to provide stakeholders with the information needed to participate effectively.

Smaller and regional CSOs face additional constraints because they often lack the resources to engage in multiple parallel consultations, and there is no comprehensive mechanism to support their participation.

The government's migration policy provides a particularly clear example of the gap between formal consultation and meaningful participation. CSOs criticised the 2025–2030 Migration Strategy and subsequent asylum legislation for being prepared without meaningful consultation with organisations working on migration, refugee protection and human rights. Public hearings took place only after key policy decisions had already been taken, leading organisations to describe the process as tokenistic. Similar concerns were raised about consultations concerning the Civil Protection Programme (NGO.pl, 2026; OFOP, 2025; OKO.press, 2024).

Trend. Mixed – the legal framework for consultation has improved, while practice remains inconsistent.

Score 3 – Mostly enabling: Stronger rules and digital tools are undermined by late, bypassed or tokenistic consultations, particularly on migration.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

The current government entered office with commitments to rebuild civic dialogue, strengthen public participation and improve cooperation with CSOs. The institutional framework for dialogue consequently improved: CSOs are represented in advisory bodies and participate in discussions on legislative and policy reforms, including through the Committee

for Public Benefit. The government also established thematic working groups to develop proposals concerning civil dialogue, volunteering and legal simplification.

The institutional expansion has not consistently translated into policy influence. As noted by F. Pazderski (Pazderski, 2025) and other sector representatives, many recommendations developed by government working groups have not resulted in legislative or policy changes. The 2025 government reshuffle also abolished the dedicated Minister for Civil Society position, raising questions about the long-term political priority attached to the sector. CSOs therefore have more institutional opportunities for dialogue than under the previous government, but the influence of these mechanisms on final decisions remains limited.

Trend. Stable – institutional channels for dialogue have expanded, but their impact on policy outcomes remains limited.

Score 3 – Mostly enabling: More institutional opportunities exist than before, but the influence of these mechanisms on final decisions is limited.

D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Polish CSOs enjoy broad legal freedom to engage in advocacy, public campaigning, strategic litigation and watchdog activities. The environment for such work improved significantly following the change of government. The Civic Space Report 2026 (European Civic Forum, 2026) notes that independent organisations no longer face the systematic hostility from public authorities experienced under the previous administration. Watchdog organisations, human rights groups and public-interest

organisations continued to publish reports, monitor public institutions, conduct strategic litigation and advocate for reforms without evidence of systematic state retaliation.

Access to public information remains an important constraint on effective watchdog activity. In 2024, the European Court of Human Rights ruled in *Sieć Obywatelska Watchdog Polska vs. Poland* that refusal to disclose the Constitutional Tribunal President's meeting calendar violated Article 10 of the ECHR. One year after the judgment, Watchdog Poland (Sieć Obywatelska Watchdog Polska, 2025) noted that, although the ruling affirmed the role of watchdog organisations, broader systemic problems in the implementation of the Access to Public Information Act remained unresolved. Its 2025 transparency report similarly identified inconsistent administrative practice and prolonged proceedings as continuing obstacles to effective civic oversight.

Trend. Improving – the environment for advocacy has become considerably more open, although access to public information remains a constraint.

Score 3 – Mostly enabling: Advocacy and watchdog work are free from state retaliation, but persistent access-to-information problems limit their effectiveness.

D5 – Government listens

> ***Standard.*** *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

Poland has a formal framework intended to ensure that public consultations result in reasoned consideration of civil society input. Under the Rules of Procedure of the Council of Ministers, ministries conducting public consultations are required to prepare a consultation

report explaining which comments were received, whether they were accepted or rejected and the reasons for the decisions. Government consultation guidelines further emphasise openness, responsiveness and accountability.

There are examples of this mechanism working as intended. The consultation report for the Strategy for Poland's Development 2030+, for example, presents responses to individual comments and identifies changes introduced as a result of stakeholder input. Similar approaches have been used in consultations conducted by the National Institute of Freedom, enabling participating organisations to identify how their recommendations were treated.

Independent monitoring nevertheless indicates substantial variation in practice. The Citizens' Legislation Forum (Schimanek, T., 2025) has identified differences in the quality and structure of consultation reports, including the absence of a uniform methodology for responding to comments, limited use of reconciliation meetings with stakeholders and, in some cases, cursory or insufficient explanations for rejecting proposals. More fundamentally, the feedback mechanism cannot provide meaningful influence where consultations are launched too late or after key political decisions have already been taken. The problems identified in the consultation of the migration strategy and in other high-profile legislative processes therefore concern not only whether authorities formally respond to comments, but whether CSO input reaches decision-makers while there is still an opportunity to affect the outcome.

Trend. Stable – the formal mechanisms for feedback are in place, but their application varies considerably.

Score 3 – Mostly enabling: Formal responsiveness mechanisms exist and work in some cases, but inconsistent practice and late consultations limit real influence.

Conclusion

The most important feature of the Polish picture in 2025–2026 is the shift from confrontation to cooperation. Poland's legal framework for civil society was never dismantled, and the main change has been in the way public authorities behave: stigmatising rhetoric has largely disappeared from government communication, favouritism towards loyal organisations has ceased, politically motivated administrative pressure has diminished, and the funding system has become more transparent. This is reflected in the highest scores for the standards concerning smearing, the safe space for CSOs, free expression of criticism and freedom of assembly, and in external assessments such as the upgraded CIVICUS rating. The composite result of 3.5 places Poland between mostly enabling and enabling.

At the same time, the findings show that the improvement rests more on political will than on lasting institutional guarantees. The scores are lowest where the environment depends on the quality of day-to-day implementation: access to public information, the effectiveness of consultations, the influence of CSOs on final decisions and the fiscal and financial sustainability of the sector. Many pledges made before the 2023 elections, including reforms of civic dialogue, consultations and financing, remain unfulfilled, the dedicated ministerial post has been abolished, and the migration policy shows that formal consultation may still fall short of meaningful participation. Hostile narratives have not disappeared but have moved to opposition politics and partisan media, and organisations working on migration, LGBTQI+ and reproductive rights remain most exposed.

For future monitoring, the key question is whether the current gains will be consolidated in legislation and durable institutions, and whether they will withstand political change. Particular attention should be paid to the adoption of the pending legal simplification and fiscal reforms, the implementation of the access-to-information framework, the quality and

timing of consultations on politically sensitive issues, the situation of organisations working with migrants and other contested groups, and the financial resilience of smaller and local CSOs.

References

1 Batory Foundation. (2025). *Oświadczenie Obywatelskiego Forum Legislacji w sprawie praktyki przeprowadzania konsultacji publicznych.* https://www.batory.org.pl/oswiadczenie/stanowisko-obywatelskiego-forum-legislacji-w-sprawie-praktyki-przeprowadzania-konsultacji-publicznych/

2 Batory Foundation. (2025). *Pozorne konsultacje w okresie świątecznym – apel Obywatelskiego Forum Legislacji w sprawie trybu procedowania projektu ustawy regulującej pomoc obywatelom Ukrainy.*https://www.batory.org.pl/oswiadczenie/pozorne-konsultacje-w-okresie-swiatecznym-apel-obywatelskiego-forum-legislacji-w-sprawie-trybu-procedowania-projektu-ustawy-regulujacej-pomoc-obywatelom-ukrainy/

3 Brot für die Welt. (2025). *Atlas der Zivilgesellschaft.* https://www.brot-fuer-die-welt.de/themen/atlas-der-zivilgesellschaft/

4 Chudzik, A. (2026). *Najważniejsze zmiany w prawie w 2026 roku z perspektywy organizacji pozarządowych.*NGO.pl. https://publicystyka.ngo.pl/najwazniejsze-zmiany-w-prawie-w-2026-roku-z-perspektywy-organizacji-pozarzadowych-tau

5 CIVICUS. (2026). *Poland.* CIVICUS Monitor. https://monitor.civicus.org/country/poland/

6 Dymek, R. (2025). *Czy są szanse na zmiany w podatku CIT dla NGO?* NGO.pl. https://publicystyka.ngo.pl/czy-sa-szanse-na-zmiany-w-podatku-cit-dla-ngo-tau

7 Economist Intelligence Unit. (2025). *Democracy Index 2025.* https://www.eiu.com/n/campaigns/democracy-index-2025/

8 European Civic Forum. (2026). *Civic Space Report 2026.*

9 European Commission. (2025). *2025 Rule of Law Report: Country Chapter on the Rule of Law Situation in Poland.*

10 Freedom House. (2025). *Freedom in the World 2025: Poland.* https://freedomhouse.org/country/poland/freedom-world/2025

11 Fundacja Rozwoju Demokracji Lokalnej. (2026). *Prezydent podpisał nowelizację ustawy o działalności pożytku publicznego i o wolontariacie.* https://frdl.org.pl/blog-edukacji-samorzadu-terytorialnego/prezydent-podpisal-nowelizacje-ustawy-o-dzialalnosci-pozytku-publicznego-i-o-wolontariacie

12 Fundacja RC. (2023). *Udział organizacji pozarządowych w procesie stanowienia prawa.*https://fundacjarc.org.pl/wp-content/uploads/2023/03/Udzial-Organizacji-Pozarzadowych-w-Procesie-Stanowienia-Prawa.pdf

13 Gumkowska, M., Charycka, B., Bednarek, J. (2022). *Efekt mrożący. O kondycji organizacji pozarządowych.*Warszawa: Klon/Jawor. https://api.ngo.pl/media/get/198337

14 Konsorcjum Migracyjne. (2024). *Rządowa strategia migracyjna – harmonogram vs. rzeczywistość.* https://konsorcjum.org.pl/rzadowa-strategia-migracyjna-harmonogram-vs-rzeczywistosc/

15 Konsorcjum Migracyjne. (2024). *W prezencie na święta rząd zawiesza prawa człowieka.*https://konsorcjum.org.pl/w-prezencie-na-swieta-rzad-zawiesza-prawa-czlowieka/

16 Kopińska, G. (2025). *Mały krok do przodu. XVI raport Obywatelskiego Forum Legislacji.* Batory Foundation. https://www.batory.org.pl/publikacja/maly-krok-do-przodu-xvi-raport-obywatelskiego-forum-legislacji/

17 Kowalski, R. (2026). *Co się dzieje w Sejmie z pomysłami organizacji na poważną nowelizację ustawy o działalności pożytku publicznego?* NGO.pl. https://publicystyka.ngo.pl/co-sie-dzieje-w-sejmie-z-pomyslami-organizacji-na-powazna-nowelizacje-pozytku-tau

18 Kowalski, R. (2025). *Kiedy przyjazne zwolnienie z CIT dla NGO?* NGO.pl. https://publicystyka.ngo.pl/kiedy-przyjazne-zwolnienie-z-cit-dla-ngo-sow

19 Klub Jagielloński. (2026). *Dobra zmiana w konsultacjach? Sejm zrealizował rekomendacje Klubu Jagiellońskiego.*https://klubjagiellonski.pl/

20 Łojkowska, M. (2025). *Powstaje nowy program ochrony ludności – organizacje chcą prawdziwych konsultacji.* NGO.pl. https://publicystyka.ngo.pl/powstaje-nowy-program-ochrony-ludnosci-organizacje-chca-prawdziwych-konsultacji-taup

21 Musaddique, S. (2025). *Civil society encouraged in Poland, discouraged in Montenegro and repressed in Bosnia.*Alliance Magazine. https://www.alliancemagazine.org/blog/civil-society-encouraged-in-poland-discouraged-in-montenegro-and-repressed-in-bosnia/

22 Mikołajczak, P. (ed). (2025). *Polish activism: NGO activity in the refugee crisis related to the war in Ukraine.*Poznań: Poznań University of Economics and Business.

23 Wójcik, A. (ed.) (2024). *Jak poprawić wolność mediów i słowa w Polsce.* Warszawa: Fundacja Ośrodek Kontroli Obywatelskiej OKO. https://publicystyka.ngo.pl/pobierz-raport-jak-poprawic-wolnosc-mediow-i-slowa-w-polsce

24 NGO.pl. (2026). *W rządowym projekcie wraca dobre zwolnienie z CIT dla organizacji pozarządowych.* https://publicystyka.ngo.pl/w-rzadowym-projekcie-wraca-dobre-zwolnienie-z-cit-dla-organizacji-pozarzadowych-tau

25 OFOP. (2025). *Konsultacje społeczne, nie obietnice. Organizacje pozarządowe apelują o zmiany.* https://ofop.eu/konsultacje-spoleczne-nie-obietnice-organizacje-pozarzadowe-apeluja-o-zmiany-relacja-ze-spotkania-zespolu-parlamentarnego-22-07-2025/

26 OKO.press. (2024). *10 błędów rządowej strategii migracyjnej.* https://oko.press/10-krytyk-rzadowej-strategii-migracyjnej

27 Panoptykon. (2026). *Kto stanie na straży rozwoju sztucznej inteligencji w Polsce? Apel organizacji.* https://panoptykon.org/kribsi-apel-organizacji

28 Pazderski, F. (2026). *Indeks odporności organizacji społeczeństwa obywatelskiego w Polsce.* Fundacja im. Stefana Batorego.

29 Pazderski, F. (2026, 30 lipca). *Czy rząd wyciągnie wreszcie rękę do pomagających nam w potrzebie?* Rzeczpospolita. https://www.rp.pl/publicystyka/art44903401-filip-pazderski-czy-rzad-wyciagnie-wreszcie-reke-do-pomagajacych-nam-w-potrzebie

30 Pazderski, F. (2025). *„Kondycja organizacji praw człowieka w Polsce" – komentarz do badania kondycji organizacji praw człowieka.* NGO.pl

31 Radio Wnet. (2026, 21 May). *Bosak żąda bezwzględnego zakazu. „Finansowanie NGO z zagranicy powinno być nielegalne".* https://wnet.fm/2026/05/21/bosak-zada-bezwzglednego-zakazu-finansowanie-ngo-z-zagranicy-powinno-byc-nielegalne

32 Sadło, K. (2026). *Wielkie nadzieje, małe efekty. Drugi rok rządów Donalda Tuska wobec NGO.* Klub Jagielloński. https://klubjagiellonski.pl/2026/01/23/wielkie-nadzieje-male-efekty-drugi-rok-rzadow-donalda-tuska-wobec-ngo/

33 Schimanek, T. (2025). *Grupa robocza ds. uproszczeń prawnych dla organizacji pozarządowych – krótkie podsumowanie pierwszego półrocza działalności.* NGO.pl. https://publicystyka.ngo.pl/grupa-robocza-ds-uproszczen-prawnych-dla-organizacji-pozarzadowych-krotkie-podsumowanie-pierwszego-polrocza-dzialalnosci-tau

34 Sieć Obywatelska Watchdog Polska. (2025). *Raport 2025.* https://siecobywatelska.pl/raport2025/

35 Sieć Obywatelska Watchdog Polska. (2025). *Rok po wyroku ETPC w sprawie Sieć Obywatelska Watchdog Polska przeciwko Polsce.* https://siecobywatelska.pl/rok-po-wyroku-etpc-w-sprawie-siec-obywatelska-watchdog-polska-przeciwko-polsce/

36 Varieties of Democracy Institute. (2025). *Democracy Report 2025.* https://www.v-dem.net/documents/54/v-dem_dr_2025_lowres_v1.pdf

37 Żaczkiewicz-Zborska, K. (2025). *Anty-SLAPP może przynieść falę prywatnych aktów oskarżenia.* Prawo.pl. https://www.prawo.pl/prawnicy-sady/anty-slapp-moze-przyniesc-fale-prywatnych-aktow-oskarzenia,1545771.html

Legal and Policy Documents

1 Government of Poland. (2025). *Odzyskać kontrolę, zapewnić bezpieczeństwo. Strategia migracyjna na lata 2025–2030.* https://www.gov.pl/web/premier/odzyskac-kontrole-zapewnic-bezpieczenstwo---strategia-migracyjna-na-lata-2025---2030

2 Government of Poland. (2025). *Raport z konsultacji publicznych projektu Strategii Rozwoju Polski 2030+.*

3 Rządowe Centrum Legislacji. (n.d.). *Uzgodnienia, konsultacje publiczne lub opiniowanie.*https://rcl.gov.pl/legislacja/rzadowy-proces-legislacyjny/opisy-procedur/projekt-ustawy/uzgodnienia-konsultacje-publiczne-lub-opiniowanie/

4 Sejm Rzeczypospolitej Polskiej. (2025). *Komunikat dotyczący konsultacji społecznych.*https://www.sejm.gov.pl/sejm10.nsf/komunikat.xsp?documentId=A3652BAE2D688EE1C1258CEC003E6E3A

5 Government of Poland. (n.d.). *Akty prawne dotyczące działalności organizacji pozarządowych.*https://www.gov.pl/web/pozytek/akty-prawne-dotyczace-dzialalnosci-organizacji-pozarzadowych

6 Government of Poland. (2026). *Poradnik „Zamówienia publiczne – NGO partnerem sektora publicznego" już dostępny.* https://www.gov.pl/web/uw-mazowiecki/poradnik-zamowienia-publiczne-ngo-partnerem-sektora-publicznego-juz-dostepny

7 Ministry of Finance. (2026). *KSeF – NGO (Organizacje pozarządowe).* https://ksef.podatki.gov.pl/ngo-organizacje-pozarzadowe/

8 *Raport Komisji ds. represji wobec społeczeństwa obywatelskiego w mediach publicznych (2015-2023).* (2025). https://api.ngo.pl/media/get/264900

Endnotes

1 The National Institute of Freedom – Centre for Civil Society Development (*Narodowy Instytut Wolności – Centrum Rozwoju Społeczeństwa Obywatelskiego*, or NIW-CRSO) is a Polish state executive agency established in 2017 to manage government funding and support programs for non-governmental organizations (NGOs), civil society initiatives, and volunteer efforts across Poland. Since its creation in under the Law and Justice administration, the institute has been a central fixture in Poland's civic landscape. In its early years, independent civil society observers and opposition figures raised concerns about the centralization of public funding under a state-appointed executive, citing risks of political favoritism toward government-aligned organizations. Following the late-2023 shift in government, the institute underwent major organizational reforms, including new leadership chosen through open recruitment and an overhauled council featuring greater civil society representation. These changes aimed to make the agency's grant selection, evaluation procedures, and funding distribution more transparent, neutral, and merit-based.

Czech Republic

Country Score: **Mostly Enabling**

Country Trend: ↘

3.25



Cluster A: 3.20
A1 Equal treatment: 3
A2 Political recognition as partners: 3
A3 Refrained authorities from smearing: 3
A4 No weaponization of state powers: 4
A5 Transparent and open public institutions: 3



Cluster B: 4.00
B1 Free establishment and operation: 4
B2 CSOs enjoy a safe space: 4
B3 Liberty of resourcing: 4
B4 Enabling fiscal environment: 4
B5 Free expression of criticism: 4



Cluster C: 3.60
C1 Citizens trust: 3
C2 Present in media: 3
C3 Free engagement: 4
C4 CSOs embedded in communities: 4
C5 Freedom of assembly: 4



Cluster D: 2.20
D1 Decision-making participation: 2
D2 Timely consultations: 2
D3 Policies for cooperation: 2
D4 Free advocacy: 3
D5 Government listens: 2

5. Civic Space Report – Czech Republic

By Martin Pánek

Introduction

A defining feature of the research period (January 2025 – June 2026) is that it spans two markedly different governing coalitions. From January to early December 2025, under the outgoing *ODS*-led coalition with Prime Minister Petr Fiala, the conditions for civil society were broadly stable, but were noted for pre-existing weaknesses in consultation practice and one serious ministerial incident of vilifying rhetoric, as in January 2025. Following the parliamentary election of 3–4 October 2025 (won by the populist *ANO* party with 34.5% of the vote) and the formation, on 9 December 2025, of a coalition government of *ANO*, nationalist *Freedom and Direct Democracy* (SPD) party, and national-conservative *Motoristé sobě* (Motorists for Themselves) party under Prime Minister Andrej Babiš, the operating environment for civil society deteriorated somewhat.

The most consequential episode of the period was the drafting of a bill that would have required virtually anyone in the Czech Republic receiving foreign funding to register as an entity 'with foreign ties', modeled in part on legislation used elsewhere to suppress civil society; the bill was shelved in March 2026 only after sustained public mobilization, including a demonstration of an estimated 250,000 people in Prague. The government has stated it will still pursue lower-intensity reporting obligations for CSOs. This episode, alongside with funding cuts for the CSO sector, explicit

government rhetoric distinguishing ‘political NGOs’ from others, and a contested overhaul of public-broadcasting funding, forms the throughline connecting most of the standards below.



Cluster A – Institutional and Political Environment and Narratives of CSOs

How do political institutions interact with and portray CSOs?

A1 – Equal treatment

> ***Standard.*** *The state treats all CSOs equally with regard to establishment, registration and activities, and does not restrict organizations for expressing critical views without privileging loyal or government-organised entities (GONGOs).*

Czech law applies a uniform registration and operating regime to all CSOs regardless of viewpoint: entry into the public register under Act No. 304/2013 Coll. and the Civil Code makes no distinction based on an organization’s views, and no privileged government-organized non-governmental organization (GONGO) category exists in statute.

The new government’s manifesto (*Programové prohlášení*) introduced the category of “political non-profit organizations” (Vláda ČR, 2025, p. 6), a framing with no basis in Czech law but used to justify differentiated treatment. The February 2026 state budget cut CSO-relevant funding across several ministries: Foreign Ministry support for international development cooperation and humanitarian assistance – including aid

to Ukraine – was almost entirely cut, Ministry of Environment funding for environmental education and protection programs fell by roughly one-third, with the government stating it aimed to stop funding organizations that allegedly "block development and investment"; and Ministry of Interior funding for migrant integration was also reduced, alongside further unspecified cuts reported across other ministries (Civic Space Watch, 2026b). For most of the period (January–November 2025), the outgoing government maintained broadly even-handed treatment; the shift is concentrated in the final seven months. Formal legal treatment remained equal throughout, but the funding decisions introduced a real, politically framed practical differential during that period.

Trend. Deteriorating – an unchanged formal legal regime accompanied by an executed, politically-framed funding differential, concentrated after the December 2025 change of government.

Score 3 – Mostly enabling: Formal registration and legal treatment remain uniform, but the February 2026 budget applied politically-framed cuts to specific categories of CSO activity – not merely rhetorical differentiation – which is why this falls short of "Enabling" despite no change to the underlying law.

A2 – Political recognition as partners

> ***Standard.*** *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

Under the 2021–2030 Strategy for Cooperation between Public Administration and NGOs, institutionalized through the Government Council for NGOs, Czech governments have formally recognized CSOs as partners. (Vláda ČR, 2026) This framework functioned throughout most of 2025, even though it was under-resourced.

The October 2025 election changed the relationship. The incoming coalition's manifesto frames NGOs as a sector to be contained, proposes a public-funding registry for "political NGOs", and calls for a ban on state funding for "political activism". (Vláda ČR 2025, p. 6, p. 8), (Balkan Insight/ BIRN, 2025); (Civic Space Watch, 2026a) But no significant meaningful action has yet materialized.

Also worth noting that who are the partners of the government changed entirely. Today, the governing coalition mostly talks only to radical NGOs very close to the represented parties.

Trend. Deteriorating since December 2025.

Score 3 – Mostly enabling: Formal partnership channels (NGO Council, 2021–2030 Strategy) remain intact, but real engagement has narrowed to organizations aligned with the coalition, and the manifesto explicitly reframes NGOs as a sector to be contained.

A3 – Refrained authorities from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs, including "foreign agent" or "enemy" framing, and do not treat international cooperation as a default form of illegitimate foreign interference.*

Vilifying rhetoric toward critical CSOs was a problem throughout the period, predating the change of government. In January 2025, Agriculture Minister Marek Výborný (KDU-ČSL) publicly blamed the environmental organization *Hnutí Duha* (The Rainbow Movement) for delaying flood-protection infrastructure after the catastrophic 2024 floods (Český rozhlas Plus, 2024), (European Civic Forum, 2025); the organization subsequently received hundreds of threatening and hateful messages, and personal data of its statutory representatives was misused to target individuals.

The pattern intensified after December 2025. A newly appointed government climate-policy commissioner suggested *Hnutí Duha* and *Arnika* could lose public grants over their advocacy and protest activities, and the deputy prime minister and foreign minister publicly branded *Hnutí Duha* a "terrorist organization" – a claim the organization is contesting through a defamation suit filed in June 2026 against both of them. (Seznam Zprávy, 2026a), Civic Space Watch (2026a) *Hnutí Duha* won at the trial court against the would-be foreign minister Filip Turek for his comments that they were "parasites" just recently, but litigation is still ongoing. (iDnes 2026)

What permeates through most of the chapters is that the government changed its policies (CSO funding, CSO partners, CSO criticism,…) based on *viewpoint discrimination*, which we view as impermissible, even if we were otherwise supportive of (or neutral toward) less government spending or of a policy change.

No effective state mechanism restrained this rhetoric during the period, and no retraction followed. Vilifying language from senior officeholders recurred under two different governing configurations, but there is a change of degree (to the worse). As unfortunate as it is, it is nonetheless contained to a handful of NGOs, and the vast majority are not affected, at least yet.

Trend. Deteriorating – from an isolated ministerial incident to a sustained, senior-level campaign.

Score 3 – Mostly enabling: No systemic policy of vilification exists, but senior-level rhetoric – including a deputy PM publicly branding an NGO a "terrorist organization" – escalated from an isolated 2025 incident to a sustained campaign, with no institutional check.

A4 – No weaponization of state powers and good governance principles

Standard. *The state does not deploy audits, inspections, tax, security or law-enforcement powers, or governance principles such as transparency or privacy protection, selectively or disproportionately to pressure CSOs.*

No evidence was found during the period of Czech authorities' use of audits, tax inspections, security services, or emergency powers in a targeted, disproportionate way against specific CSOs; no organization was investigated, raided, or sanctioned for its advocacy.

The clearest emerging risk is administrative, not coercive. After shelving a draft "foreign agents" registry bill, the Justice Minister announced the government would instead pursue a decree expanding CSOs' funding-disclosure obligations. (FundsforNGOs, 2026), (Wolf Theiss, 2025) The lobbying law that took effect on 1 July 2025 also created new registration and disclosure duties broad enough that CSO advocacy risks being swept in. Still, no enforcement action against CSOs under this law was reported within the period.

Trend. Stable, with early-warning signs of rising administrative burden.

Score 4 – Enabling: No evidence of targeted audits, raids or law-enforcement pressure; the deficit is emerging administrative burden from a planned disclosure decree and a new lobbying-registration law, neither yet enforced against CSOs.

A5 – Transparent and open public institutions

Standard. *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and hold authorities accountable.*

The Czech Republic maintains a reasonably strong formal transparency framework: Public registers for CSOs, contracts, and lobbying activity are open, and the country remains bound by access-to-information obligations consistent with the Aarhus Convention and the ICCPR.

Implementation is uneven. The 2025 civic-space report found that ministries frequently failed to conduct targeted consultations as required by the 2021–2030 NGO cooperation strategy. (European Civic Forum, 2025) The civil-society oversight of legislation depends heavily on CSOs' own unfunded expertise rather than institutionalized transparency mechanisms.

Trend. Stable-to-declining on substantive consultation, despite persistent formal openness.

Score 3 – Mostly enabling: The formal transparency framework is strong, but substantive consultation is unevenly implemented, and oversight relies on CSOs' own unfunded capacity rather than institutionalized mechanisms.



Cluster B – Legal and Financial Framework for CSOs

What formal conditions shape CSO operations and sustainability?

B1 – Free establishment and operation

Standard. *Everyone can freely establish, join or participate in a CSO; where registration is required, the procedure is clear, simple, quick and inexpensive; and the state does not interfere in internal governance or impose onerous monitoring.*

Establishing a CSO in the Czech Republic is and remains procedurally straightforward. Associations, foundations, and institutes register easily under the Civil Code and Act No. 304/2013 Coll., with a system unchanged over the period and low formation costs and timelines by regional standards.

Trend. Formally stable; practice destabilized by a serious, only partly withdrawn legislative threat (discussed in other chapters).

Score 4 – Enabling: Registration remains fast, cheap and legally unchanged; the only qualification is a legislative threat (the foreign-ties bill) that was shelved before taking effect.

B2 – CSOs enjoy a safe space and protection from arbitrariness

> ***Standard.*** *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

No CSO was suspended, dissolved, or administratively sanctioned on political grounds, and Czech courts continued to provide an accessible venue for redress – illustrated by *Hnutí Duha*'s own June 2026 defamation suit against a deputy prime minister and an MP. (Seznam Zprávy, 2026a)

Trend. No acute breach yet, but underlying risk rising.

Score 4 – Enabling: No CSO was suspended, dissolved or sanctioned on political grounds, and courts stayed accessible for redress; the deficit is a rising, not-yet-realized risk from the broader climate.

B3 – Liberality of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment and without stigmatization.*

Formally, Czech law does not bar CSOs from seeking domestic, foreign or international funding, and no foreign-agent-style penalty on foreign funding was enacted during the period – the closest such proposal was shelved in March 2026. (FundsforNGOs, 2026)

In practice, resourcing conditions deteriorated in 2026. The February 2026 state budget cut CSO-relevant funding across several ministries: Foreign Ministry support for international development cooperation and humanitarian assistance – including aid to Ukraine – was largely cut, Ministry of Environment funding for environmental education and protection programs fell by roughly one-third, with the government stating it aimed to stop funding organizations that allegedly "block development and investment"; and Ministry of Interior funding for migrant integration was also reduced, alongside further unspecified cuts reported across other ministries (Civic Space Watch, 2026b). (Civic Space Watch, 2026b)

Trend. Deteriorating – a sharp public funding contraction concentrated in early 2026.

Score 4 – Enabling: No legal barrier to domestic, foreign or international funding exists, and the closest such proposal was shelved; the deficit is an already-executed funding contraction in the February 2026 budget.

B4 – Enabling fiscal environment

> ***Standard.*** *CSOs and their donors enjoy a favorable and stable tax environment that supports resourcing and encourages philanthropy, with AML/CFT and sanctions measures applied proportionately and on a risk basis.*

No change to the Czech tax-deductibility regime for charitable donations was enacted during the period, and the basic architecture remained in force throughout. A January 2025 amendment to the Public Collections Act simplified fundraising-campaign administration and introduced voluntary registration, reducing rather than increasing the compliance burden for donation-based fundraising. (European Civic Forum, 2025)

No CSO-specific AML/CFT enforcement action or "de-banking" case was documented in Czech sources during the period.

Trend. Broadly stable, with a new disclosure requirement as an emerging pressure point.

Score 4 – Enabling: The tax-deductibility regime is unchanged and a 2025 amendment simplified fundraising administration; the only emerging pressure point is a new disclosure requirement, not yet in force.

B5 – Free expressions of criticism

> ***Standard.*** *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

The constitutional guarantee of free expression was not curtailed by new legislation during the period, and Czech civil society and journalists

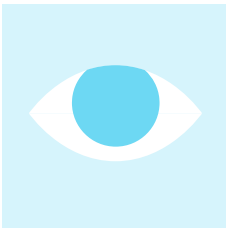
continued to publish sharply critical material about the government throughout, including detailed investigative and civic-space monitoring reporting on the government's own conduct toward NGOs.

Corporate SLAPP-type litigation was flagged in the 2025 civic-space report, in which corporations used the courts to discourage civil society engagement on environmental policy. (European Civic Forum, 2025) There is no dedicated anti-SLAPP safeguard in Czech law. More significant during 2026 was the chilling effect of senior officials' own rhetoric: being publicly branded a "terrorist organization" by the deputy prime minister carries reputational and potentially legal risk disproportionate to ordinary political criticism, and *Hnutí Duha*'s decision to sue for defamation illustrates both the severity of the rhetoric and the organization's assessment that legal recourse was necessary. (Civic Space Watch, 2026a), (Seznam Zprávy, 2026a)

Formal expression rights remained intact and were actively exercised. Still, the material risk environment for CSOs voicing criticism – from both private SLAPP-style pressure and state-official vilification – worsened over the period.

Trend. Deteriorating, but driven by rhetoric, not new legal restrictions.

Score 4 – Enabling: No new legal restriction on expression was enacted and CSOs/journalists published freely throughout; the deficit is reputational and legal risk from officials' own vilifying rhetoric, absent an anti-SLAPP safeguard.



Cluster C – Public Engagement and Perceptions towards the Work of CSOs

How are CSOs perceived, and how do citizens engage with them?

C1 – Citizens' trust

> ***Standard.*** *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

Long-running CVVM institutional trust surveys do not track CSOs as a distinct category with the same granularity as security or political institutions, revealing a broader data gap that further limits accountability. The most direct recent measurement, a June 2025 STEM/OSF Foundation survey, found that roughly one-third of the public declares trust in CSOs' work, rising sharply – up to 20 points higher – among people with direct experience as donors, volunteers or service users, and considerably higher among younger respondents. (STEM / OSF Foundation, 2025)

The same research found generational and issue-based polarization. Younger people see CSOs as legitimate agents of change, while older respondents are supportive of CSOs in education, culture, charity and social care but far more skeptical of their involvement in political or advocacy work – a division that closely tracks the "political NGO" framing the incoming government began deploying at the same time.

Baseline trust was already moderate rather than strong at the start of the period, and escalating official rhetoric labeling advocacy CSOs as

“political” or, in one case, as “terrorist” directly targets the more skeptical segment of public opinion, creating downward pressure on an already middling baseline.

Trend. Weak baseline, with downward pressure building from political rhetoric.

Score 3 – Mostly enabling: Roughly a third of the public trusts CSOs, rising sharply among those with direct experience; the deficit is an already-moderate baseline and generational polarization the “political NGO” framing is reinforcing.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

Czech Television and Czech Radio have functioned for three decades as internationally recognized models of independent public-service broadcasting, providing CSOs with reasonably diverse channels to reach the public.

This changed somewhat within the researched period. In April 2026, the Culture Ministry presented a bill abolishing the license-fee funding model and replacing it with fixed annual state allocations (Euronews, 2026) – while cutting Czech Television’s funding from roughly €274 million to €233 million and Czech Radio’s from about €102 million to €82 million. This was a bill international press-freedom organizations said was drafted “without proper consultation with [...] media experts [or] civil society policy stakeholders” and flagged as potentially incompatible with the EU’s Media Freedom Act. (International Press Institute, 2026), (Reporters Without Borders, 2026) The government approved the law in June 2026

despite strikes by broadcaster staff and public protests, with critics warning that dependence on annual budget allocations exposes editorial decisions to political pressure.

Beyond public broadcasting, the private media sector includes outlets previously linked to the Prime Minister's business holdings, with a longstanding conflict-of-interest concern predating this period. Formal media pluralism remains intact, but the institutional guarantee of independent public-service coverage – an important channel for CSO visibility – was substantially weakened by the end of the period. Some of the private media outlets are opposed to CSOs – a noteworthy connection between large online media outlets *Echo24* and *Parlamentní listy* and the NGOs *Alliance for Family* and the aforementioned *Society for the Defense of the Freedom of Expression* (more below) that are very influential in today's governing coalition, connected through Marek Španěl, owner of the media outlets and a large benefactor of the NGOs. (Voxpot 2025)

Trend. Deteriorating in the first half of 2026 around public-broadcasting independence.

Score 3 – Mostly enabling: Formal media pluralism remains intact and public broadcasting has a long independence record; the deficit is a June 2026 law cutting broadcaster funding and shifting it to annual state allocations, passed without proper consultation.

C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities – volunteering, activism, donating, protest – and such participation is socially accepted and not penalized.*

Czechs exercised civic-engagement rights vigorously and without penalty throughout the period. The clearest evidence is the scale of public mobilization among other things against the draft "foreign agents" law in

spring 2026, but primarily to support public media. Organizers estimated that roughly 250,000 people gathered at Prague's *Letná* plain, which was described as the country's largest anti-government demonstration since 2019 and full of explicit references to avoiding the trajectories of Hungary and Slovakia. (Reuters, 2026) Public-sector unions and public-media staff also mounted large-scale protests and strikes during the period without state interference. (Euronews, 2026).

Social norms remain broadly supportive of civic participation. Survey data show strong public approval of donating to NGOs, and personal experience as a volunteer or donor increases trust in NGOs. (STEM, 2025)

No credible reports emerged during the period of citizens facing legal or administrative penalty for volunteering, donating, or protesting. The record shows a strong, actively used civic space at the citizen-participation level, which serves as a counterweight to the more adversarial institutional climate described elsewhere in this assessment.

Trend. Stable, and arguably stronger than institutional trends elsewhere in this report would suggest.

Score 4 – Enabling: Citizens engaged in protest, volunteering and donation at high volume – including a 250,000-person demonstration – without any reported penalty; the strongest-performing standard in the assessment.

C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.*

CSOs demonstrated their ability to mobilize grassroots solidarity. When *Hnutí Duha* came under sustained political attack – first over the 2024 flood-response controversy and later over the "terrorist organization" label

other organizations rallied in solidarity, and the organization reported broad public support alongside the hostile messages it received.

The spring 2026 mobilization against the foreign-ties registry bill likewise depended on a broad cross-section of civil society, professional groups (including universities and the media, both named as potential targets of the draft law), and ordinary citizens acting together, rather than on a single organization. Organizers of the *Letná* demonstration explicitly framed the protest around defending the wider civic and democratic space rather than any single organization's interests. (EUobserver, 2026), (Reuters, 2026)

Trend. Stable to strengthening, largely in reaction to institutional pressure.

Score 4 – Enabling: CSOs mobilized broad cross-sector and grassroots solidarity in response to institutional pressure, illustrated by both the *Hnutí Duha* support wave and the spring 2026 mobilization.

C5 – Freedom of assembly

> ***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, to organize and participate in assemblies, without unwarranted interference.*

The legal framework for assembly is well established under Act No. 84/1990 Coll. on Freedom of Assembly and Article 19 of the Charter of Fundamental Rights and Freedoms. Assemblies require only advance notification rather than authorization; spontaneous assemblies are permitted; and organizer liability is limited to preserving peacefulness. This system was unchanged during the period.

Practice was consistent with the formal guarantee. The roughly 250,000-strong *Letná* demonstration in spring 2026 (Reuters, 2026); protests by public media staff, and union-led rallies against austerity measures all proceeded without reports of state interference, mass detentions, or disproportionate policing – in contrast to more restrictive

practices documented in some neighboring countries over the same period (AP, 2026).

Structural boundaries noted by assembly-rights specialists pre-date the period and remain in place – restrictions on organizers who are aliens, stateless persons, or non-resident legal entities – but these did not materially constrain the large-scale mobilizations that in fact occurred. (Rightofassembly.info, 2021); Assembly rights were exercised at unusually high volume during the period and were consistently respected by the authorities.

Trend. Stable and robustly exercised throughout the period.

Score 4 – Enabling: The notification-based assembly framework is unchanged and was exercised liberally, without state interference or disproportionate policing.



Cluster D – CSOs as Policy Makers

To what extent do CSOs influence and shape public policy?

D1 – Right to participate in decision-making including in the policy cycle

Standard. *Everyone has the right to participate in decision-making; authorities ensure meaningful public and CSO participation across the policy cycle, with redress for non-compliance.*

The formal architecture for CSO participation in policymaking remains in place: The Government Council for Non-Governmental Non-Profit Organizations is a standing consultative body mandated to comment on and help shape legislation affecting NGOs, and the 2021–2030 Strategy for Cooperation between Public Administration and NGOs formally commits ministries to structured engagement, reinforced through the Czech Republic's Open Government Partnership action plan for 2024–2026. (Vláda ČR, 2026)

Implementation was already uneven before the change of government. The 2025 report on civic space found that "civil dialogue across public administration remain[ed] weak", that several ministries "did not carry out targeted consultations" tied to strategy-monitoring recommendations, and that the strategy carries no dedicated budget item. This weak baseline deteriorated further in 2026. (European Civic Forum, 2025).

The right to participate therefore exists on paper and through a standing institutional channel, but its exercise in practice – for the most consequential legislation of the period – was largely bypassed.

Most worryingly, the current government moved various councils and agendas from the Office of the Government to ministries, e.g. the Council for Equality of Men and Women was moved to the Ministry of Labor and Social Affairs. The government is about to amend councils' statutes; they will now have to heed the government's manifesto instead of giving unbiased advice. It has led to resignations of council experts and warning from the EU. (iRozhlas 2026) These efforts are spearheaded by Tünde Bartha, a proven connection between the Babiš and Orbán governments. (iRozhlas 2026a), (Hlídací pes 2026)

Trend. A pre-existing problem of weak implementation became more pronounced on major pieces of 2026 legislation.

Score 2 – Restrictive leaning: The formal consultative architecture still exists but was bypassed on the period's most consequential legislation,

and agenda transfers away from the Office of Government – driven by an official with documented Orbán-government ties – drew resignations and EU criticism.

D2 – Timely consultations and equal participation

> ***Standard.*** *Consultations are launched early, allow adequate time, and supply the information needed for substantive input; participation is adequately resourced and accessible so grassroots and under-resourced CSOs are not excluded.*

When consultations were held formally, the quality was mixed even before the change of government. The 2025 civic-space report documented that no regulatory impact assessment was planned for at least one significant piece of NGO-relevant legislation. It criticized the lobbying law for imposing a disproportionate procedural burden on civil society participants relative to its anti-corruption benefits. (European Civic Forum, 2025)

Two flagship 2026 initiatives illustrate a further decline. The foreign-ties registry bill was drafted by a working group of coalition MPs. It only became public when a working version leaked in March 2026 – the opposite of early, resourced, accessible consultation. (Radio Prague International, 2026a) It is to be noted, ironically, that the bill was drafted by (or in cooperation with) an NGO with an Orwellian name, the *Society for the Defense of the Freedom of Expression* (SOSP), which is personally intertwined with the *Motoristé* party (most obviously through MP Sedláčková who used to serve as the Operations Manager at the SOSP). The public-media funding bill followed a similarly closed process, presented to broadcaster leadership only as an already-settled plan, with the Czech Radio director-general noting that staff were simply informed rather than consulted. (Radio Prague International, 2026b).

Grassroots and under-resourced CSOs – precisely the constituencies this standard is meant to protect from token consultation – had essentially no opportunity to shape the bills before they reached the public; input existed only reactively, through subsequent public mobilization.

Trend. Deteriorating – leaked or closed drafting replaced structured consultation.

Score 2 – Restrictive leaning: Formal consultation channels exist but were not used for either flagship 2026 initiative – the foreign-ties bill leaked rather than being consulted on, the media bill was presented as a settled plan – leaving grassroots CSOs no opportunity for input.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

The Czech Republic retains a nominal institutionalized cooperation framework – the 2021–2030 Strategy and the Government Council for NGOs – and a new action-plan cycle was due for government approval in spring 2025, suggesting policy continuity was intended at the start of the period. European Civic Forum (2025)

The change of government at the end of 2025 introduced a competing and contradictory policy direction. The new coalition's manifesto explicitly proposes ending "political NGO" funding, introducing a registry for publicly funded civil organizations, and barring "public money for political activism" (Vláda ČR, 2025) – proposals that reframe state–CSO cooperation as a risk to be managed rather than a public good to be facilitated, and which commentators pointed out "run throughout" the coalition document despite having no grounding in existing Czech law.

Whether the pre-existing strategy and council survive as functioning mechanisms under the new government's priorities was not yet resolved by the end of the period, but the direction of travel – from a chronically underused and underfunded though intact cooperation framework toward an adversarial funding and registration agenda – is unambiguous.

Trend. Deteriorating, with institutional continuity in question going forward.

Score 2 – Restrictive leaning: A nominal cooperation framework remains on paper, but the manifesto reframes CSO cooperation as a risk to be managed, and whether the framework survives in practice is unresolved.

D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Advocacy and watchdog CSOs operated without formal legal restrictions on their activities throughout the period. No law reclassifying advocacy as prohibited "political" activity was enacted, and organizations such as *Hnutí Duha*, *Arnika* and anti-corruption groups continued to publish critical analysis, campaign publicly and pursue legal action through June 2026. (Civic Space Watch, 2026a)

The practical environment nonetheless worsened. The incoming government's manifesto explicitly targets "public money for political activism". (Radio Prague International, 2026a) It proposes disclosure obligations aimed at organizations engaged in activities "that may influence public opinion and debate" – a definition broad enough to capture core watchdog functions. A government-appointed climate-policy commissioner suggested that advocacy and protest activities could specifically be grounds for losing public funding.

No advocacy organization was shut down, taxed punitively or legally barred from campaigning during the period, but the manifesto's own framing and an official's explicit suggestion that advocacy could cost organizations their funding constitute a material signal of intent that CSOs must now weigh in planning their activities.

The practical asymmetry extends beyond rhetoric. As detailed under D2, access to the legislative process itself has become uneven: organizations personally or institutionally aligned with the governing coalition had a practical channel into policymaking that watchdog organizations critical of the government did not. Free advocacy and watchdogging thus increasingly depends on viewpoint and an organization's proximity to the coalition rather than being uniformly available.

Trend. Deteriorating – a still-unrestricted formal position, but accompanied by explicit governing-coalition signals (manifesto language, a funding-linked threat from a sitting official) that watchdog activity specifically is being targeted for future constraint.

Score 3 – Mostly enabling: No advocacy organization was formally restricted, defunded or reclassified during the period, and critical watchdog groups continued to publish and litigate through June 2026. The score reflects that practical access to the policy process has become asymmetric – coalition-aligned organizations had a hand in drafting major legislation while critical CSOs did not – alongside explicit official signals that advocacy-linked funding could be at risk.

D5 – Government listens

Standard. *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

Even under the more CSO-engaged outgoing government, the feedback loop between civil society input and final legislative results was assessed as weak. The EU's 2024 Rule of Law Report noted that CSOs "expressed regrets that the Government does not generally take up its specific recommendations" from consultative bodies, including on lobbying and whistleblowing legislation, where "few of the points [...] were taken on board in the final legislation". This pre-existing weakness is the baseline against which we must read the 2026 developments. (European Commission, 2024)

The clearest 2026 illustration of the pattern came when the government reversed itself on the foreign-ties/NGO-disclosure legislation. Justice Minister Jeroným Tejc announced that neither his ministry nor the government was preparing such a law. (Seznam Zprávy 2026b) The reversal is telling less for what it did than for how it happened: it followed the leaked draft's public exposure and the *Letná* mobilization, not any acknowledged consultative process, and the government offered no reasoned account of which specific civil-society objections, if any, informed the decision – the draft was simply disowned rather than engaged with.

The *Letná* outcome and the subsequent bill withdrawal do show Czech authorities remain capable of responding to public pressure. But responsiveness by disavowal – reversing course without a reasoned, traceable account of why – is not the same as the institutional feedback mechanism this standard requires, and the standard's requirement was not met.

Trend. Persistently weak — responsiveness occurs only under acute public pressure, and even then without reasoned engagement or acknowledgment of civil society's role in the outcome.

Score 2 – Restrictive leaning: Letná shows authorities can respond to sustained public pressure, but the EU's own 2024 assessment found CSO recommendations routinely not taken up, and no reasoned, traceable feedback mechanism exists.

Conclusion

Across all twenty standards, the Czech Republic's civic space remains, in absolute terms, mostly enabling to enabling – no CSO was shut down, defunded punitively, or barred from campaigning, courts stayed open for redress, and citizens engaged in protest, volunteering and donation at historically high volume.

The direction of travel, however, is broadly negative, and the negative trend is concentrated almost entirely in the seven months following the December 2025 change of government. Three developments stand out: first, a shift in official narrative that recasts advocacy and human-rights-adjacent CSOs as "political" actors, running from budget language through ministerial rhetoric to a deputy prime minister's "terrorist organization" claim against a named organization; second, a marked decline in the *practice* of consultation, with the two most consequential pieces of 2026 legislation – the foreign-ties registry bill and the public-media funding overhaul – bypassing established consultative channels entirely; and third, a real, already-executed contraction in public funding for CSO-relevant programming (development aid, environmental education, migrant integration) alongside a weakening of public-broadcasting independence, an important channel for CSO visibility.

Institutional continuity for the 2021–2030 NGO cooperation framework is now in question. Counterbalancing this, Czech civil society itself has proven resilient and assertive: the roughly 250,000-person *Letná* mobilization, sustained union and media-staff strikes, and CSOs' own recourse to litigation (including a sitting deputy PM being sued for defamation) show a civic culture still able and willing to defend itself, and public authorities have shown they can be moved by sustained pressure even without a formal feedback mechanism. The central risk for future editions of this assessment is that the pressure currently expressed mostly through rhetoric, administrative signaling and funding decisions could convert into binding legal restriction – particularly if the shelved foreign-ties provisions, or the lower-intensity reporting obligations the government says it will still pursue, are revived.

References

1 AP. (2026) Czech public broadcasters stage warning strike over government plan to change funding https://apnews.com/article/czech-public-media-financing-protest-babis-44f951daaa32331369124c10522b38c1

2 Balkan Insight / BIRN. (2025). New Czech government to follow CEE trend of targeting NGOs. https://balkaninsight.com/2025/12/03/new-czech-government-to-follow-cee-trend-of-targeting-ngos/rd/

3 Civic Space Watch. (2026a). Czech Republic: Leading politicians threaten funding and brand environmental CSOs "terrorists". https://civicspacewatch.eu/alert/czech-republic-leading-politicians-threaten-funding-and-brand-environmental-csos-terrorists/

4 Civic Space Watch. (2026b). Czech Republic: Civic space under pressure from funding cuts and policy shifts by the new right-wing government. https://civicspacewatch.eu/alert/czech-republic-civic-space-under-pressure-from-funding-cuts-and-policy-shifts-by-the-new-right-wing-government/

5 Civic Space Watch. (2026c). Czech Republic: Draft "foreign agents" law shelved, but pressure on civil society remains. https://civicspacewatch.eu/alert/czech-republic-draft-foreign-agents-law-shelved-but-pressure-on-civil-society-remains/

6 Český rozhlas Plus. (2024). Nové Heřminovy by ochránily Krnov a Opavu, míní Výborný. „My jsme stavbu nezdrželi," říká aktivistka. https://plus.rozhlas.cz/nove-herminovy-ochranily-krnov-a-opavu-mini-vyborny-my-jsme-stavbu-nezdrzeli-9315938

7 EUobserver. (2026, March 25). Now Babiš' Czech Republic wants a Russian-style 'foreign agents' law against NGOs. https://euobserver.com/208080/now-babis-czech-republic-wants-a-russian-style-foreign-agents-law-against-ngos/

8 Euronews. (2026). Czech government scraps licence fees for public media in move critics call threat to press freedom. https://www.euronews.com/my-europe/2026/06/15/czech-government-scraps-licence-fees-for-public-media-in-move-critics-call-threat-to-press

9 European Civic Forum. (2025). Civic Space Report 2025 – Czech Republic. https://web.archive.org/web/20251116001345/https://www.glopolis.cz/site/assets/files/1480/civic_space_report_2025_-_czechrepublic.pdf

10 European Commission. (2024). 2024 Rule of Law Report – Country Chapter on the rule of law situation in Czechia. https://commission.europa.eu/document/download/47ec6130-cb4d-407d-a8aa-481e4fe73eb2_en?filename=12_1_58057_coun_chap_czechia_en.pdf

11 FundsforNGOs. (2026, March 24). Ruling coalition drops foreign-funded NGO law proposal. https://news.fundsforngos.org/2026/03/24/ruling-coalition-drops-foreign-funded-ngo-law-proposal/

12 Government of the Czech Republic. (2026). Government Council for Non-Governmental Non-Profit Organizations. vlada.gov.cz.

13 Hlídací pes. 2026. „Jela jsem po vlastní ose." Tünde Bartha vysvětluje předvolební cestu za Orbánem. https://hlidacipes.org/jela-jsem-po-vlastni-ose-tunde-bartha-vysvetluje-predvolebni-cestu-za-orbanem/

14 International Press Institute. (2026). Czech Republic: Public media funding bill raises concerns over compatibility with EMFA. https://ipi.media/czech-republic-public-media-funding-bill/

15 iDnes. 2026. Turek prohrál soud s Hnutím Duha, musí se omluvit za výrok o „parazitech“. https://www.idnes.cz/zpravy/domaci/filip-turek-hnuti-duha-parazit-soud-prohra.A260914_095725_domaci_dyn

16 iRozhlas. 2026. Kabinet připravuje nové statuty rad vlády. Podle kritiků tím zničí jejich specifičnost. https://www.irozhlas.cz/zpravy-domov/kabinet-pripravuje-nove-statuty-rad-vlady-podle-kritiku-tim-znici-jejich_2609202042_vsn

17 iRozhlas 2026a. ‚Ptejte se paní Tünde.‘ Vládní špičky žehlí následky utajovaných přesunů z Úřadu vlády na ministerstva. https://www.irozhlas.cz/zpravy-domov/ptejte-se-pani-tunde-vladni-spicky-zehli-nasledky-utajovanych-presunu-z-uradu_2605210640_jgr

18 Radio Prague International. (2026a). Government coalition planning to tighten law on NGOs. https://english.radio.cz/government-coalition-planning-tighten-law-ngos-8880807

19 Radio Prague International. (2026b). Government to push ahead with public media funding shift. https://english.radio.cz/government-push-ahead-public-media-funding-shift-8888978

20 Reporters Without Borders. (2026). Czechia: Government's chaotic reform of public broadcasters raises alarm. https://rsf.org/en/czechia-government-s-chaotic-reform-public-broadcasters-raises-alarm-rsf-and-partners-call-european

21 Reuters. (2026). Czechs rally in country's largest anti-government protest since 2019. https://www.reuters.com/world/czechs-rally-countrys-largest-anti-government-protest-since-2019-2026-03-21/

22 Rightofassembly.info. (2021). Freedom of assembly in Czech Republic. https://www.rightofassembly.info/country/czechia

23 Seznam Zprávy. (2026a). Hnutí Duha podalo žaloby na Macinku a Turka kvůli údajně poškozujícím výrokům. https://www.seznamzpravy.cz/clanek/domaci-zivot-v-cesku-hnuti-duha-podalo-zaloby-na-macinku-a-turka-kvuli-udajne-poskozujicim-vyrokum-309226

24 Seznam Zprávy. (2026b) Tejc: Zákon proti neziskovým organizacím nechystá ministerstvo ani vláda. https://www.seznamzpravy.cz/clanek/domaci-politika-tejc-zakon-proti-neziskovym-organizacim-nechysta-ministerstvo-ani-vlada-302456

25 STEM. (2025). Civil society organizations: Nearly 60% of the public values their role during natural disasters and other crises. https://www.stem.cz/en/civil-society-organizations-nearly-60-of-the-public-values-their-role-during-natural-disasters-and-other-crises/

26 Vláda ČR. (2025) Programové prohlášení vlády. https://vlada.gov.cz/cz/jednani-vlady/navrh-programoveho-prohlaseni-vlady-162319/

27 Vláda ČR. (2026). Government Council for Non-Governmental Non-Profit Organizations. vlada.gov.cz. https://vlada.gov.cz/cz/ppov/rnno/zakladni-informace-767/

28 Voxpot. (2025) Svět podle Španěla. Jak přemýšlí bojovník za svobodu říkat cokoli. https://www.voxpot.cz/clanky/svet-podle-spanela-jak-premysli-bojovnik-za-svobodu-rikat-cokoli

29 Wolf Theiss. (2025). New lobbying law effective from 1 July 2025 in the Czech Republic: What will it mean in practice? https://www.wolftheiss.com/insights/new-lobbying-law-effective-from-1-july-2025-in-the-czech-republic-what-will-it-mean-in-practice/

Ukraine

Country Score: **Mostly Enabling**

Country Trend: ↔

3.15



Cluster A: 3.00
A1 Equal treatment: 3
A2 Political recognition as partners: 4
A3 Refrained authorities from smearing: 3
A4 No weaponization of state powers: 3
A5 Transparent and open public institutions: 2



Cluster B: 3.20
B1 Free establishment and operation: 4
B2 CSOs enjoy a safe space: 3
B3 Liberty of resourcing: 3
B4 Enabling fiscal environment: 3
B5 Free expression of criticism: 3



Cluster C: 3.60
C1 Citizens trust: 4
C2 Present in media: 3
C3 Free engagement: 4
C4 CSOs embedded in communities: 4
C5 Freedom of assembly: 3



Cluster D: 2.80
D1 Decision-making participation: 3
D2 Timely consultations: 2
D3 Policies for cooperation: 3
D4 Free advocacy: 3
D5 Government listens: 3

6. Civic Space Report – Ukraine

By Oksana Kuziakiv

Introduction

Since Russia's full-scale invasion in February 2022, Ukraine has been governed under martial law, which has been repeatedly extended and remained in force throughout the assessment period (January 2025 – June 2026). Martial law permits restrictions on certain rights, including freedom of assembly, and has led to the postponement of national elections, while the war continues to cause large-scale displacement, emigration and destruction. At the same time, Ukraine has pursued an ambitious reform agenda anchored in its EU candidacy: accession negotiations formally opened in 2024, and in June 2026 the first negotiating cluster, "Fundamentals", was opened, placing democratic institutions, the rule of law and fundamental rights at the center of the process.

Against this background, Ukrainian civil society combines a long tradition of civic mobilization—from the Orange Revolution of 2004 and the Revolution of Dignity of 2013–2014 to the volunteer movement that emerged in response to Russian aggression—with a growing professional sector of think tanks, watchdogs, human-rights groups and service providers. The period assessed was shaped in particular by the continuing demands of the war on civil society's people and resources; by the 2025 suspension of major U.S. assistance, which tested the sector's funding model; and by the July 2025 anti-corruption protests, which showed that civic mobilization retained real political influence under wartime conditions. This report assesses Ukraine's civic space against the project's twenty standards across four clusters.



Cluster A – Institutional and Political Environment and Narratives of CSOs

A1 – Equal treatment

Standard. *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

Formally, the state provides a broadly non-discriminatory framework for CSOs. Public associations and charitable organizations may be established and operate without political loyalty tests, and there were no documented patterns in 2025–June 2026 of restricting organizations simply because they criticized officials or policy. CSO Meter also found no known practice of government institutions systematically giving preferential treatment to organizations. Foreign-founded organizations face additional documentation and verification, but the legal grounds for registration and dissolution are generally the same. The more important inequality is functional rather than ideological: CSOs are often treated less favorably than businesses in access to rapid digital registration, banking services, and some public-procurement procedures (ECNL & ISAR Ednannia, 2026).

The period nevertheless produced two opposite tendencies. On the positive side, automatic online registration for public organizations using a model charter became available through Diia in April 2026, narrowing a long-standing gap between CSOs and businesses (Ministry of Digital

Transformation, 2026). On the negative side, smaller and relocated organizations, especially those linked to temporarily occupied territories, continued to face heavier banking verification, account restrictions, and compliance burdens. At the local level, research also documents "pocket" or authority-affiliated CSOs created to attract donor resources, which can imitate pluralism and crowd out independent initiatives even when their creation is driven by pragmatic local needs. Equal treatment is therefore broadly respected, but not fully achieved in practice (ISAR Ednannia, 2025).

Trend. Stable – equal treatment held broadly steady, as the April 2026 Diia registration reform narrowed the gap between CSOs and businesses while banking and verification burdens on smaller and relocated organizations persisted.

Score 3: The framework is broadly non-discriminatory, but equal treatment is not fully achieved in practice, as banking burdens and "pocket" CSOs create functional inequalities.

A2 – Political recognition as partners

> ***Standard.*** *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

Ukrainian public authorities generally recognize civil society as a legitimate actor, and CSOs have become indispensable partners in areas ranging from humanitarian response and social services to anti-corruption, recovery, public administration and EU accession. The state's practical dependence on civil society expertise is unusually high. Think tanks draft policy options, conduct regulatory and economic analysis, prepare shadow reports and monitor reforms; service-delivery organizations support groups that the state cannot always reach effectively. In the 2025 sector survey, 46% of CSOs received partnership invitations from government

institutions, while 48% rated cooperation positively at the local level, 41% with regional/district administrations, and 28% with central authorities (ISAR Ednannia, 2025).

The practical quality of this partnership varies. CSO Meter found that access to parliament, government, and the Presidential Office remained insufficiently open, while EU-accession working groups sometimes operated through fragmented or formal consultation rather than co-creation. These shortcomings, however, concern the timing, access and feedback of participation, which are assessed under D1, D2 and D5, rather than the political recognition of CSOs as legitimate partners. On recognition itself, the evidence is consistent: the EU accession process reinforced the partnership model in 2026, as rule-of-law events and EU-funded programs explicitly brought together state institutions, experts and civil society, reflecting official recognition of CSOs as contributors to implementation and monitoring (EEAS, 2026a; EEAS, 2026b). Political recognition of CSOs as partners is therefore assessed as Enabling.

Trend. Stable – official recognition of CSOs as partners was maintained throughout the period and reinforced in 2026 by the EU accession process.

Score 4: Public authorities consistently recognize CSOs as legitimate and indispensable partners, a role reinforced by the EU accession process.

A3 – Authorities refrain from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

The assessment period did not show a systematic state-sponsored narrative portraying independent CSOs as "foreign agents", enemies, or illegitimate foreign proxies. International funding is legally accepted and remains a normal part of the sector's operating model. CSO Meter reported

that organizations receiving foreign grants were not generally stigmatized by government or state-supported media, and older draft initiatives that could have created "foreign influence" restrictions were not enacted. This distinguishes Ukraine from several regional cases where delegitimizing rhetoric has preceded formal civic-space restrictions (ECNL & ISAR Ednannia, 2026).

This does not mean the information environment is benign. Ukrainian civil society operates amid intense Russian disinformation and hybrid attacks, while individual activists, journalists and organizations may be targeted by online harassment or polarising domestic narratives. The state's own rhetoric is usually supportive of volunteering and civil society, particularly where organizations contribute to defense and recovery. The principal risk is therefore not a consolidated official smear strategy but episodic political hostility toward watchdog or critical actors, especially around contentious anti-corruption and governance issues. The lack of an institutionalized "foreign agent" frame, combined with continued official and EU-supported cooperation with independent CSOs, supports a Mostly Enabling score, while the wartime information environment and isolated attacks argue against the highest rating.

Trend. Stable – no official smear or "foreign agent" narrative emerged during the period, although episodic hostility toward watchdog actors persisted within a hostile wartime information environment.

Score 3: There is no institutionalized "foreign agent" frame or official smear strategy, but the wartime information environment and isolated attacks prevent the highest rating.

A4 – No weaponization of state powers and good governance principles

> ***Standard.*** *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, emergency measures, or principles such as transparency and fiscal due diligence — selectively or disproportionately to pressure CSOs because of their activities or views.*

There is no evidence of systematic use of tax inspections, audits, law enforcement or emergency powers to suppress CSOs because of their views. Registration and reporting rules are generally defined by law, and forced dissolution remains rare and subject to court decisions. The organizations prohibited in 2025 were linked by courts to threats to national security, sovereignty or territorial integrity in the context of Russia's aggression; available evidence does not show a generalized mechanism for silencing independent civic actors (ECNL & ISAR Ednannia, 2026).

However, "good governance" tools can create disproportionate burdens. AML/CFT and ultimate beneficial owner requirements remain poorly adapted to non-profit governance. Banks have requested grant agreements, founders' residence information, and additional proof related to occupied territories, sometimes delaying transactions or access to accounts. The 2025 national risk-assessment discourse also raised concern that generic indicators could classify ordinary civil-society activity as a higher financial-monitoring risk. The Law on Lobbying likewise raised concerns that advocacy could be confused with commercial lobbying, although the assessment period documented no systematic repression through that framework. The issue is therefore one of structural risk and administrative overreach rather than established political weaponization.

Trend. Stable, with risk – no political weaponization of state powers was documented, but AML/CFT, UBO and lobbying rules remained a latent source of disproportionate burden.

Score 3: State powers are not systematically used against CSOs, but AML/CFT, UBO and lobbying rules create a structural risk of disproportionate administrative burden.

A5 – Transparent and open public institutions

> ***Standard.*** *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

Access to information and institutional openness remain among the weakest dimensions of Ukraine's civic environment. Martial law has legitimate security consequences, but it has also normalized reduced transparency. CSO Meter identified insufficient openness in parliament, government, and the Presidential Office; difficulties accessing parliamentary committee work; uneven local transparency; and cases where public consultations were not conducted even when formally required. Parliament resumed broadcasting plenary sessions in 2025, and legislation strengthened obligations to broadcast local council meetings, but implementation remained incomplete (ECNL & ISAR Ednannia, 2026).

The material effect is significant because Ukrainian CSOs increasingly perform watchdog, public-spending, and EU-accession monitoring functions. Restricted or delayed access to data directly reduces their ability to scrutinize decisions and evaluate implementation. Civil society has repeatedly advocated restoration of open data and more transparent decision-making, while the 2025–2026 National Strategy action plan includes measures to improve participation and dialogue. By April 2026, the government was publishing implementation information on

this plan, which is positive. Nevertheless, the dominant pattern during the assessment period remained a gap between formal transparency commitments and practical access, especially for early-stage decision-making. The trend is mixed rather than clearly deteriorating: some parliamentary and digital openness was restored, but wartime opacity remains structurally important (Cabinet of Ministers of Ukraine, 2025; 2026).

Trend. Mixed – the resumption of parliamentary broadcasting and published strategy-implementation data were offset by persistent wartime opacity, especially in early-stage decision-making.

Score 2: Martial law has normalized reduced transparency, leaving a persistent gap between formal transparency commitments and practical access to information.



Cluster B – Legal and Financial Framework for CSOs

B1 – Free establishment and operation

Standard. *Everyone can freely establish, join, or participate in a CSO; CSOs determine their own objectives; registration is clear, simple, quick, and inexpensive. The state does not interfere in internal governance, and monitoring or reporting is defined by law, proportionate and not onerous*

Freedom of association is strongly protected in law and, despite wartime disruption, generally respected in practice. Public organizations may operate with or without legal personality; charitable organizations operate as legal entities. State registration is free, objectives and geographic scope can be determined independently, and there are no general territorial restrictions on lawful CSO activity. Reporting is relatively standardized and may be completed online. In 2025, CSO Meter rated freedom of association as the strongest area of Ukraine's enabling environment, with few practical obstacles to creation, membership, or participation (ECNL & ISAR Ednannia, 2026).

The trend improved further in the first half of 2026. Following experimentation with a model charter, Ukraine launched automated registration of public organizations through the Diia portal on 21 April 2026. The service allows eligible founders to complete an online application and register a new organization without direct interaction with a state registrar; inclusion in the non-profit register can also be requested in the same process (Ministry of Digital Transformation, 2026; State Tax Service of Ukraine, 2026). Some limitations remain—such as the model-charter format and separate treatment for foreign founders—but the reform materially reduces time, paperwork, and the role of discretionary administrative practice. Against the project standard, establishment and ordinary operation are therefore assessed as Enabling.

Trend. Improving – the April 2026 launch of automated registration through Diia further simplified the establishment of public organizations.

Score 4: Freedom of association is strongly protected, and automated registration through Diia makes establishment simple, quick and free.

B2 – CSOs enjoy a safe space and protection from arbitrariness

Standard. *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

Ukrainian law protects CSOs from arbitrary suspension or dissolution and provides judicial review. Forced termination is exceptional and requires legal grounds. In the period assessed, court prohibitions were primarily justified by national-security concerns arising from Russian aggression and alleged threats to sovereignty or territorial integrity. There was no broader pattern of dissolving ordinary independent organizations for critical advocacy. Nor were there documented mass sanctions against CSOs for participation in lawful policymaking or public debate (ECNL & ISAR Ednannia, 2026).

The principal safety problem is the war itself. Civil society staff, volunteers, humanitarian workers, journalists and activists face Russian attacks, occupation-related threats, cyberattacks and the risks of working in frontline or de-occupied territories. Some CSO representatives serve in the Armed Forces, and organizations have lost staff to both military service and Russian strikes. Protection by Ukrainian institutions is not always fully effective, particularly in relation to threats against journalists, activists and certain public events. Freedom House and Ukrainian monitoring organizations continued to document intimidation and pressure affecting media and civic actors in 2026. Thus, the domestic legal framework is protective, but the lived environment cannot be described as fully safe. The score reflects the distinction between the absence of systematic state arbitrariness and the severe physical and institutional risks of wartime.

Trend. Stable – legal protection against arbitrary suspension or dissolution remained intact, while war-related physical and security risks continued unabated.

Score 3: The legal framework protects CSOs against arbitrary dissolution, but the war makes the lived environment far from fully safe.

B3 – Liberality of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

CSOs are legally free to seek, receive, and use domestic and foreign resources. There is no general "foreign funding" prohibition or special tax penalty for international grants, and electronic donations, crowdfunding, and in-kind support are permitted. This legal openness is crucial because international funding is the backbone of Ukraine's professional civil society. In the 2025 survey, 25.4% of organizations received international grants; 70.9% viewed international grants as the funding source that most needs further development. By contrast, only around 8% reported state or local-budget funding, and public funding is generally project- or sector-specific rather than a broad institutional-financing system (ISAR Ednannia, 2025).

The key weakness is practical sustainability. The 2025 interruption of U.S. assistance acted as a stress test: 22.3% of active CSOs reported negative effects, with affected organizations reducing or suspending projects and 57% unable to replace the lost funding. Domestic donations and membership fees are widespread but declined sharply as a reported source, while 26.7% of surveyed organizations had no sustainable funding and relied solely on volunteer labor. Banking controls also complicate cross-border transfers. EU and member-state support remained substantial—by April 2026 the EU reported more than EUR 200 million committed to Ukrainian CSOs since 2022—but resource freedom should not be confused with resource sustainability (EEAS, 2026c).

Trend. Deteriorating financially – the legal freedom to raise resources was unchanged, but the 2025 suspension of U.S. assistance exposed and deepened the sector's funding vulnerability.

Score 3: CSOs are legally free to raise domestic and foreign resources, but resource freedom should not be confused with resource sustainability.

B4 – Enabling fiscal environment

> ***Standard.*** *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures and sanctions regimes are applied to CSOs proportionately and on a risk basis.*

Ukraine provides important baseline tax advantages for non-profit organizations: qualifying CSOs can obtain non-profit status and are exempt from corporate income tax on resources used for statutory purposes. Grants, donations, membership fees and certain economic activity may support non-profit work, and in 2025 VAT exemptions were extended to social-service providers, including CSOs (ECNL & ISAR Ednannia, 2026).

However, non-profit status can be lost for technical violations, and frequent Tax Code amendments reduce predictability. Donor incentives are modest and rarely used, and no percentage-designation mechanism exists. CSOs are not AML/CFT reporting entities, but banks often treat them as high-risk by default. The result is lengthy account opening, repeated information requests and delayed transfers, especially for smaller organizations. There is no evidence of sanctions regimes being applied against CSOs.

In analytical terms, this is Ukraine's central civic-space vulnerability: CSOs are free to set their agendas, but their capacity to sustain those agendas

can become fragile when donor priorities shift. The fiscal environment is therefore assessed as Restrictive Leaning despite favorable non-profit tax status.

Trend. Stable – favorable tax treatment was maintained and modestly extended through the 2025 VAT exemption, while donor incentives and banking practices toward CSOs did not change significantly.

Score 3: The core fiscal regime is favorable, but fragile non-profit status, weak donor incentives and AML/CFT practices that are only partly risk-based prevent the highest score.

B5 – Free expression of criticism

> ***Standard.*** *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

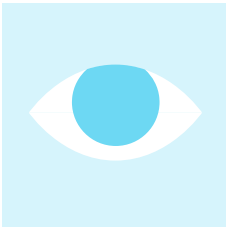
CSOs, activists, experts and journalists continue to criticize authorities publicly and to campaign on contentious issues. The July 2025 anti-corruption protests are the strongest example: demonstrations against legislation affecting NABU (National Anticorruption Bureau of Ukraine) and SAPO (Specialized Anti-Corruption Prosecutor's Office) were widely covered and followed by rapid legislative correction. This shows that strong criticism remains possible. There is no general ban on CSO advocacy or public criticism, and the government does not systematically prosecute organizations for critical positions (ECNL & ISAR Ednannia, 2026).

At the same time, freedom of expression faces pressure from two sources. Externally, Russia is responsible for most threats to media workers: of 26 press-freedom violations documented by the Institute of Mass Information in January 2026, 18 were attributed to Russia, and Russian attacks on media workers continued in June 2026 (IMI, 2026a; IMI, 2026b). Domestically, Freedom House noted continued intimidation of and

institutional pressure on journalists and concerns about the consolidated television news environment, and CSO Meter lowered its 2025 freedom-of-expression assessment (Freedom House, 2026). This domestic pressure is limited in scope, but together with wartime threats it means the information environment is not fully secure or pluralistic.

Trend. Mixed – open criticism remained widespread and politically effective, while Russian attacks on media workers and domestic pressure on journalists continued.

Score 3: Open criticism remains widespread and politically effective, but Russian attacks and domestic pressure on journalists mean the information environment is not fully secure or pluralistic.



Cluster C – Public Engagement and Perceptions towards the Work of CSOs

C1 – Citizens' trust

> ***Standard.*** *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

Public trust is one of the strongest assets of Ukrainian civil society. The full-scale invasion produced an exceptional rise in trust in volunteer organizations and NGOs, and although trust declined from its 2022–2023 peak, it remained high in 2025. Early-2025 survey data synthesized by ISAR Ednannia show trust at about 80% for volunteer organizations

and 61% for NGOs, compared with approximately 47% trust in NGOs before the full-scale invasion. Across several years, volunteer initiatives maintained roughly a twenty-point trust advantage over formal NGOs, but both categories remained considerably more trusted than many political institutions (ISAR Ednannia, 2025).

This trust reflects civil society's direct experience during war: military support, humanitarian aid, social services, local mutual assistance, recovery, and advocacy. It also provides a protective political resource. When formal institutions lose credibility, citizens still tend to view volunteer and civic structures as legitimate channels for collective action. The decline from the wartime peak should not be interpreted as civic delegitimization; rather, it indicates normalization after extraordinary mobilization and increasing public scrutiny of the sector. Given the sustained majority trust in formal CSOs and exceptionally high trust in volunteers, the standard is assessed as Enabling.

Trend. Stable at a high level – trust eased from its 2022–2023 peak but remained well above pre-invasion levels, particularly for volunteer organizations.

Score 4: Trust remains high—around 80% for volunteer organizations and 61% for NGOs—well above pre-invasion levels.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

CSOs have access to a diverse media environment, especially online, and there is no systematic exclusion of independent civil society voices from public debate. Digital platforms are central to the sector itself: 83.3% of organizations surveyed in 2025 used social networks and messengers

to reach audiences, while research products, expert commentary, and civil-society monitoring frequently appear in independent online media. The anti-corruption protests of 2025 were widely covered across Ukrainian outlets, demonstrating that critical civic mobilization can receive national visibility (ISAR Ednannia, 2025; ECNL & ISAR Ednannia, 2026).

However, media pluralism is constrained by war, financial shocks, and state influence over the consolidated television news format. Independent media also suffered from the 2025 reduction of U.S. funding, and some outlets required emergency support from European sources. Freedom House continued to raise concerns about pressure on journalists and the legal powers available to the media regulator. These constraints matter for CSOs because media access shapes their ability to build constituencies and hold institutions accountable. The environment remains substantially pluralistic, particularly online, but is not fully enabling. The trend is mixed: strong independent digital media coexist with financial fragility, Russian attacks, and unresolved concerns about institutional pressure.

Trend. Mixed – pluralistic online media continued to give CSOs visibility, while funding shocks and concerns about the consolidated television news format weighed on the wider media environment.

Score 3: The media environment remains substantially pluralistic, particularly online, but is constrained by war, funding shocks and state influence over television news.

C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.*

Ukrainians remain able to volunteer, donate, join civic initiatives, and participate in advocacy on an extraordinary scale. The formal register of

volunteers rose dramatically after 2022, but official numbers capture only a fraction of real participation. In the 2025 CSO survey, 73% of organizations operated entirely through volunteer labor. Volunteer initiatives were also the most common cooperation partners for formal CSOs: about 70% of organizations worked with them at least occasionally. This indicates that civic participation is not confined to professional NGOs but is embedded in wider patterns of social mobilization (ISAR Ednannia, 2025).

There is no general state penalty for volunteering, donating, or joining lawful civic activity. Restrictions arise mainly from martial law, security rules, and the sensitive nature of defense-related activities. Civic participation remains socially valued, and organizations supporting the military, veterans, and war-affected communities remain among the most visible actors in public life. The period also demonstrated that young people could mobilize politically through protest when they regard ordinary consultation channels as ineffective. Although the war creates obvious personal risks and some activities require additional regulation, free civic engagement remains a defining feature of Ukraine and meets the Enabling standard.

Trend. Stable at a high level – volunteering, donating and civic mobilization remained widespread and socially valued throughout the period.

Score 4: Volunteering, donating and civic mobilization take place on an extraordinary scale and are socially valued, without state penalty.

C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and can mobilize grassroots support, public solidarity, and cross-sector backing in defense of civic space.*

Ukrainian civil society has deep local roots. In the 2025 nationwide survey, 47% of active CSOs described themselves as local organizations, and 21.6%

as regional. Most local organizations reported stable staffing despite wartime pressures, and 63.8% of respondents considered their impact in their own communities significant—up from 54.5% in 2023. CSOs provide humanitarian aid, youth activities, psychological support, social services, community development, and support for veterans and vulnerable groups, creating direct relationships with beneficiaries rather than relying solely on national advocacy (ISAR Ednannia, 2025).

Community embeddedness is also visible in horizontal solidarity. Fifty-seven per cent of organizations rated mutual support among CSOs during the war as high, and another 22% as very high; shared goals and values were the most frequently cited basis for cohesion. The weakness is unequal access to larger networks and resources. Local organizations are less likely than regional or national CSOs to receive international grants, work with foreign partners, or participate in recovery projects. A "localization paradox" persists: Ukrainian and local actors perform a large share of humanitarian delivery but receive a much smaller share of direct international funding. This resource inequality does not negate community embeddedness, but it limits how far grassroots legitimacy can be converted into institutional influence.

Trend. Stable at a high level – local embeddedness remained strong, with 63.8% of CSOs reporting significant community impact in 2025, up from 54.5% in 2023.

Score 4: CSOs have deep local roots and strong horizontal solidarity, although unequal access to resources limits their institutional influence.

C5 – Freedom of assembly

Standard. *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

The Constitution protects peaceful assembly, and ordinary law imposes no general requirement for government permission. Martial law allows restrictions for security reasons, and practice varies substantially by region. In 2025, complete bans were reported in several regions and partial restrictions in others, while Kyiv and a number of regions had no general ban. Despite these constraints, peaceful assemblies took place across the country, including anti-corruption protests, demonstrations by relatives of prisoners of war and missing persons, student protests and Pride-related events. CSO Meter recorded no general pattern of dispersal of peaceful assemblies in 2025 (ECNL & ISAR Ednannia, 2026).

The July 2025 "Cardboard Protests" were particularly important because they demonstrated the continued political relevance of assembly under wartime conditions and helped reverse legislation affecting anti-corruption institutions. At the same time, security justifications can be applied unevenly, and organizers of some events reported insufficient police facilitation or pressure connected to venue and security decisions. The absence of a dedicated comprehensive assembly law also leaves practice dependent on constitutional standards, court jurisprudence, local rules, and martial-law decisions. Freedom of assembly is therefore substantially available but not fully enabling during the period assessed.

Trend. Stable but constrained by martial law – assemblies continued to take place and to influence policy, while region-specific restrictions persisted.

Score 3: Peaceful assemblies continued across the country and influenced policy, but martial-law restrictions vary by region and are applied unevenly.



Cluster D – CSOs as Policy Makers

D1 – Right to participate in decision-making including in the policy cycle

> ***Standard.*** *Everyone has the right to participate in decision-making, and authorities use mechanisms ensuring meaningful public and CSO participation, with redress for non-compliance, across the whole policy cycle and without discrimination.*

Ukraine has a substantial formal framework for public participation, including Cabinet procedures, regulatory-policy consultation mechanisms and local democracy instruments. A major 2025 improvement was the entry into force of legislation that expanded forms of participation at the local level and explicitly recognized internally displaced persons as community residents. The 2025–2026 National Strategy action plan also includes measures to improve public consultation, local participation, deliberative dialogue, and CSO involvement in policy processes. CSOs can participate in international and EU-level advocacy without retaliation, and Ukrainian organizations increasingly produce shadow reports and monitor the accession process (Cabinet of Ministers of Ukraine, 2025; ISAR Ednannia, 2025).

Practice is less consistent. CSO Meter found that access to the Parliament, Cabinet, and Presidential Office remained uneven and that EU-accession working groups sometimes presented already prepared decisions rather than involving civil society early in the formulation process. Only 19.4% of CSOs in the 2025 survey rated their opportunities to influence state policy as high; 46.6% rated them medium and 34% low. Nevertheless, formal

institutions are moving in a more participatory direction, and the opening of EU Cluster 1 in June 2026 increases incentives for structured participation. The right exists and is meaningful, but it is not yet implemented consistently across the full policy cycle.

Trend. Improving formally – new local-participation legislation and the 2025–2026 action plan widened participation rights, although practice across the policy cycle remained uneven.

Score 3: The right to participate is meaningful and formally expanding, but it is not yet implemented consistently across the full policy cycle.

D2 – Timely consultations and equal participation

> ***Standard.*** *Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible, so that grassroots and under-resourced CSOs are not excluded due to limited means.*

The central weakness of participation is not the absence of consultative mechanisms but their quality and timing. CSO Meter describes cases where consultation is late, selective or fragmented, including in the EU-accession process. Working groups may provide information on decisions that are already substantially formed, with limited public protocols, feedback or coordinated calendars. Parliament's committee system also permits substantial discretion over who is invited and who can speak. These practices favor well-connected and well-resourced national organizations over local or under-resourced actors (ECNL & ISAR Ednannia, 2026).

Resource inequality deepens this problem. Local CSOs are less likely to have international funding, dedicated policy staff, or access to central institutions, while 73% of surveyed organizations rely exclusively on volunteers. A quarter of local organizations reported no communication

with donors, and local CSOs were less integrated into recovery partnerships. Thus, even where consultation is formally open, participation costs can exclude organizations closest to affected communities. The Law on Public Consultations represents an important formal advance, but its full implementation remains delayed by the martial-law timetable. The assessed reality therefore falls short of the project standard requiring early, adequately resourced and substantively equal participation.

Trend. Stable, with weak practice – consultations continued to be late, selective or fragmented, and full implementation of the Law on Public Consultations remained deferred under martial law.

Score 2: Consultations are often late, selective or fragmented and favor well-resourced national organizations over local actors.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

Ukraine has an explicit state policy framework for cooperation with civil society. The National Strategy for Promoting Civil Society Development for 2021–2026 remained in force, and in March 2025 the Cabinet approved an action plan for 2025–2026. The plan covers participation in public policy, institutional development of CSOs, social and economic development, volunteering, and cross-sector cooperation. Civil society experts were involved in its preparation, and the government published implementation updates, including information as of 1 April 2026 (Cabinet of Ministers of Ukraine, 2025; 2026).

Sectoral cooperation is also increasingly institutionalized. In 2025, CSOs were integrated into social-service delivery through public and donor-supported mechanisms, and legislation improved the tax treatment of

social-service providers. EU accession creates additional structured venues for engagement in rule of law, democratic institutions, and reform monitoring. Yet cooperation remains uneven across ministries and levels of government, and external donors, rather than the Ukrainian state, finance much of the sector's operational capacity. The government therefore recognizes and uses CSO capacity but has not built sufficiently strong domestic financial architecture to sustain it. Policy commitment to cooperation is clear and improving; implementation quality and resourcing remain the limiting factors.

Trend. Improving – the 2025–2026 action plan and deeper integration of CSOs into social services and EU accession strengthened the policy basis for cooperation.

Score 3: There is an explicit and improving policy framework for cooperation, but implementation quality and domestic resourcing remain limiting factors.

D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Advocacy and watchdog work remain legitimate and widespread. Ukrainian think tanks, anti-corruption organizations, human-rights groups, media organizations and business associations routinely monitor government performance, propose legislation, challenge decisions and communicate with international partners. Civil society has helped shape laws on public consultations, local democracy, and administrative procedure; advocated reforms in legal education and tobacco regulation; monitored open data and the Ukraine Facility; and prepared alternative reports for the European Commission. These activities are not generally taxed or reclassified as prohibited political activity (ISAR Ednannia, 2025).

The main legal concern is the boundary between advocacy and lobbying following the Law on Lobbying, which entered into force in September 2025. CSOs raised concerns that poorly calibrated implementation could impose obligations on public-interest advocacy designed for commercial influence. No systemic crackdown through the law was documented by June 2026, so the risk remains prospective rather than established. The 2025 anti-corruption episode also demonstrated watchdog capacity: civil society mobilization challenged a government decision and achieved reversal. Ukraine therefore remains mostly enabling for advocacy, but financial dependence, legal ambiguity, and uneven access to officials prevent an unequivocal top score.

Trend. Stable – advocacy and watchdog work remained free and effective, while the new Law on Lobbying introduced a prospective rather than realized risk.

Score 3: Advocacy and watchdogging remain free and effective, while financial dependence, legal ambiguity around lobbying and uneven access prevent the top score.

D5 – Government listens

> ***Standard.*** *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

Assessing whether the Ukrainian government "listens" to civil society requires an important qualification: civil society is not a single actor and does not speak with one voice. CSOs represent different constituencies and policy perspectives and may advocate competing or even contradictory solutions. Therefore, the government's decision not to adopt a particular CSO recommendation should not automatically be interpreted as evidence that civil society is not heard. A more appropriate test is

whether different positions can reach decision-makers, whether they are genuinely considered, and whether civil society expertise can affect the final policy outcome.

Available evidence nevertheless indicates some deterioration in perceptions of government responsiveness. The 2025 survey rated communication with public authorities at only 3.2 out of 5, with satisfaction lower at the central than at the local level. CSO Meter similarly identified weaknesses in institutional feedback: consultation outcomes and government responses are not always systematically documented, and organizations involved in EU-accession processes have sometimes reported fragmented participation or insufficient feedback after providing expertise (ISAR Ednannia, 2025; ECNL & ISAR Ednannia, 2026).

At the same time, civil society exercises substantial real influence. Government responsiveness is particularly visible where CSOs provide expertise or analytical capacity that public institutions lack. This is especially important in the EU accession process, where think tanks and expert organizations analyze the EU acquis, assess gaps in Ukrainian legislation, develop policy options, and contribute to legislative harmonization. In such areas, cooperation can go beyond consultation and approach co-production of public policy. The 2025 anti-corruption protests provide a different example: strong civic mobilization helped reverse legislation affecting the independence of NABU and SAPO.

The main weakness is therefore not a general unwillingness of the government to listen, but the uneven and insufficiently institutionalized characteristics of government responsiveness. Influence varies across institutions, policy areas and organizations, while formal feedback explaining how CSO recommendations were considered remains inconsistent. At the same time, a lower score would risk confusing government refusal to engage with civil society with legitimate government choices between competing civil society positions. Ukraine is therefore assessed as Mostly Enabling, although the weakening of institutional feedback during the assessment period should be monitored.

Trend. Mixed – CSO influence remained substantial where expertise was needed, but perceived responsiveness and institutional feedback weakened.

Score 3: CSOs exercise substantial real influence, especially where they provide expertise, but government responsiveness remains uneven and insufficiently institutionalized.

Conclusion

Ukraine has a strong and resilient civil society. Its strength derives from civic agency, public trust, professional expertise and grassroots mobilization, built through practical engagement with citizens and reinforced since the full-scale invasion. Since then, CSOs have become an integral part of the country's resilience: they support defense and war-affected populations, deliver social services and provide policy expertise, particularly in the EU accession process, that would otherwise have had to be generated within the state. This role is widely recognized. In early 2025, around 80% of citizens trusted volunteer organizations and 61% trusted NGOs, and European partners continue to treat civil society as a central actor in Ukraine's democratic resilience and EU accession (ISAR Ednannia, 2025; European Commission, 2026). Civil society is also plural rather than monolithic: organizations represent different constituencies and may openly disagree on the same policy problem. Government responsiveness is therefore better judged by access to decision-makers, timely consultation and a realistic possibility of influence than by the share of CSO recommendations adopted. On this test, Ukraine performs better than a purely procedural assessment would suggest. Examples include expert co-production in EU accession and the successful 2025 defense of NABU and SAPO against the curtailment of their powers, which would have damaged Ukraine's relations with the EU.

Ukraine broadly meets liberal civic-space standards. Freedom of association, civic mobilization, public criticism and advocacy remain

strong, and the legal framework is broadly permissive. The remaining weaknesses lie mainly in implementation and infrastructure: uneven transparency of public institutions, delayed or fragmented consultations, banking and AML/CFT burdens, and limited institutional feedback on civil society input. Two structural challenges also require attention. First, the professional sector depends heavily on international funding, while domestic public financing remains limited and program-based. CSOs remain free to set their own agendas, but their capacity becomes more fragile when donor priorities shift. Second, mobilization, emigration, exhaustion and the movement of experienced experts into government and international organizations have reduced the sector's human capital and institutional memory, even as this transfer strengthens the capacity of the state. Overall, Ukraine is best characterized as a country of exceptionally strong civic agency, whose main task now is to build the institutions and resources that would allow this agency to translate into sustained influence.

References

1 Cabinet of Ministers of Ukraine. (2025). Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026 (Order No. 246-r, 21 March 2025). https://zakon.rada.gov.ua/laws/show/246-2025-%D1%80

2 Cabinet of Ministers of Ukraine. (2026). National Strategy and implementation updates, including implementation status as of 1 April 2026. https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/spriyannya-rozvitku-gromadyanskogo-suspilstva/natsionalna-stratehiia-spryiannia-rozvytku-hromadianskoho-suspilstva-v-ukraini-na-2021-2026-roky/natsionalna-stratehiia-ta-plany-zakhodiv-z-ii-realizatsii

3 Civic Space Assessment Project. (2026). Civic Space Assessment Project: Common Methodology, Analytical Framework, and Set of Standards for a Liberal Model of CSO Operations (v6-FINAL, 3 July 2026).

4 ECNL & ISAR Ednannia. (2026). CSO Meter: Empowered for Action – Ukraine 2025 Country Report. Reporting period January–November 2025.

5 European Commission. (2026, June 15). EU and Ukraine open first accession negotiations cluster. https://enlargement.ec.europa.eu/news/eu-and-ukraine-open-first-accession-negotiations-cluster-2026-06-15_en

6 European External Action Service. (2026a, May 14). Rule of Law as the Foundation of European Integration: Progress on Reforms and Next Steps Discussed in Kyiv. https://www.eeas.europa.eu/delegations/ukraine/rule-law-foundation-european-integration-progress-reforms-and-next-steps-discussed-kyiv_en

7 European External Action Service. (2026b, April 20). Operation 'European Integration': Reforms in the Justice Sector / launch of Frontline for Justice. https://www.eeas.europa.eu/delegations/ukraine/eu-ambassador-ukraine-katar%C3%ADna-mathernov%C3%A1-joined-%E2%80%9Coperation-%E2%80%98european-integration%E2%80%99-reforms-justice_en

8 European External Action Service. (2026c, April 24). With EU support IER launches a new EUR 1.5 million project for Ukrainian civil society. https://www.eeas.europa.eu/delegations/ukraine/eu-support-ier-launches-new-%E2%82%AC15-million-project-ukrainian-civil-society_en

9 Freedom House. (2026). Freedom in the World 2026: Ukraine. https://freedomhouse.org/country/ukraine/freedom-world/2026

10 Institute of Mass Information. (2026a, February 16). Freedom of Speech Barometer for January 2026. https://imi.org.ua/monitorings/barometr-svobody-slova-za-sichen-2026-roku

11 Institute of Mass Information. (2026b, July 2). Freedom of Speech Barometer for June 2026. https://imi.org.ua/en/monitorings/barometr-svobodi-slova-za-cherven-2026-roku

12 ISAR Ednannia. (2025). Civil Society in Ukraine During Wartime, 2022–2025: Report on a Comprehensive Sociological Study. Kyiv: ISAR Ednannia / Social Indicators Centre.

13 Ministry of Digital Transformation of Ukraine. (2026, April 21). Automatic registration of a public organisation launched in Diia. https://diia.gov.ua/news/zapuskaiemo-avtomatychnu-reiestratsiiu-hromadskoi-orhanizatsii-v-dii

14 State Tax Service of Ukraine. (2026, April 21). State Tax Service joined the new Diia service for online registration of public organisations. https://tax.gov.ua/en/mass-media/news/1003247.html

Moldova

Country Score: **Mixed – Enabling Leaning**

Country Trend: ↗

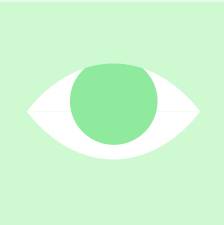
2.75



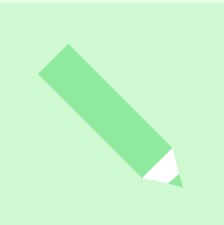
Cluster A: 3.00
A1 Equal treatment: 3
A2 Political recognition as partners: 3
A3 Refrained authorities from smearing: 3
A4 No weaponization of state powers: 3
A5 Transparent and open public institutions: 3



Cluster B: 3.00
B1 Free establishment and operation: 4
B2 CSOs enjoy a safe space: 3
B3 Liberty of resourcing: 3
B4 Enabling fiscal environment: 2
B5 Free expression of criticism: 3



Cluster C: 2.60
C1 Citizens trust: 3
C2 Present in media: 2
C3 Free engagement: 3
C4 CSOs embedded in communities: 2
C5 Freedom of assembly: 3



Cluster D: 2.40
D1 Decision-making participation: 3
D2 Timely consultations: 2
D3 Policies for cooperation: 3
D4 Free advocacy: 2
D5 Government listens: 2

7. Civic Space Report – Moldova

By Igor Ciurea

Introduction

This report assesses civic space in the Republic of Moldova between 1 January 2025 and 30 June 2026. The period was shaped by three developments: the country's accelerating EU-accession process, the September 2025 parliamentary elections held amid intensive Russian hybrid interference, and the abrupt withdrawal of US development funding, on which much of the sector depended. Overall, Moldova scores 2.8 out of 4, between "Restrictive Leaning" and "Mostly Enabling". The accession agenda has produced legislative reform and an expanding cooperation architecture between the state and civil society, and the legal framework for CSOs remains largely open; these are reflected in the two strongest clusters, the institutional and political environment and the legal and financial framework (both 3.0). Practice, however, remains uneven: fiscal and foreign-funding pressures weigh on CSO sustainability, a record number of attacks on journalists coexists with persistent local capacity gaps among CSOs (2.6), and the more politically significant a legislative dossier, the less CSO input appears to shape its final outcome (2.4).



Cluster A – Institutional and Political Environment and Narratives of CSOs

How do political institutions interact with and portray CSOs?

A1 – Equal treatment

Standard. *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

The 2020 Law on Non-Commercial Organisations sets uniform rules for the establishment, registration and activities of CSOs and contains no category that privileges government-aligned entities. In March 2025, opposition deputies from the Bloc of Communists and Socialists tabled a "foreign agents" bill modelled on Russian and Georgian legislation, which would have imposed separate, stigmatizing obligations on foreign-funded CSOs. The parliamentary majority did not support it, and a weakened version remained pending without adoption throughout the period (CSO Meter, 2025c).

Registration and operational practice remained even-handed, with one exception. During the 2025 energy crisis triggered by the suspension of gas deliveries to Transnistria, the Commission for Emergency Situations granted energy-cost compensation only to commercial enterprises, excluding CSOs, including CSO-run social enterprises (Promo-LEX, 2025).

The decision created a direct financial burden for the affected organizations during an acute crisis, but it was an isolated administrative measure rather than a pattern of targeting critical organizations.

Trend. The situation deteriorated slightly because of the crisis-related exclusion, although the failure of the "foreign agents" bill prevented a more serious setback.

Score 3: Equal treatment is preserved in law and in most practice, but the exclusion of CSOs from crisis support and a pending hostile bill keep the score below the top band.

A2 – Political recognition as partners

Standard. *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

There is no general statutory duty to treat CSOs as partners, but the EU-accession process has created several cooperation channels, including the drafting of a new Public Participation Law led by the State Chancellery and the sectoral Roadmaps required by the accession framework. In February 2026, the State Chancellery launched the sixth Open Government Action Plan, following an 87% implementation rate for the 2023–2025 cycle (Moldpres, 2026), and new dialogue formats, such as a Parliament–CSO conference, were introduced (Moldova 1, 2026).

The influence of CSOs on decisions is more limited. In May 2025, the Government adopted the Roadmaps on the rule of law and on the functioning of democratic institutions largely in their initial wording, without the main amendments proposed by CSOs (CSO Meter, 2025a). Of the 56 contributions civil society experts submitted on 35 draft normative acts in 2025, about a quarter were fully or partially accepted

(Moldova 1, 2026). Civil society representatives also report that consultations are often formal and that criticism of government policy is poorly received.

Trend. Recognition is improving, but unevenly, as the formal cooperation architecture is expanding faster than the influence of CSO input on final decisions.

Score 3: Recognition of CSOs as partners in the EU-accession process is growing, but the low uptake of substantive CSO proposals in key documents such as the Roadmaps limits the score.

A3 – Refrained authorities from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

No law authorizes state bodies to label CSOs as "foreign agents", and the governing majority did not use such rhetoric during the period. "Foreign agent" and hidden-interest narratives were nevertheless widespread. Opposition deputies, mainly from the Bloc of Communists and Socialists, were the most visible source, but during the September 2025 electoral campaign candidates from several parties attacked CSOs, particularly those working against disinformation, and networks linked to Russian-backed influence operations amplified the same messages (Eastern Partnership Civil Society Forum, 2025; Logos-Press, 2026a). Statements by governing-party figures were rare but not entirely absent (Promo-LEX, 2026).

CSOs report a chilling effect from these sustained narratives, even though their source is mainly the opposition, electoral competitors and external actors rather than the executive (Logos-Press, 2026a). This distinguishes

Moldova from countries where the government itself drives stigmatizing discourse, although the authorities do not consistently counter such narratives.

Trend. Government rhetoric remained stable, but civil society describes the online and regional environment as increasingly hostile, especially around elections.

Score 3: Governing authorities have largely refrained from stigmatizing rhetoric, but hostile "foreign agent" narratives remain active in the opposition and electoral space and are not consistently countered.

A4 – No weaponization of state powers and good governance principles

Standard. *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, or emergency measures and principles such as transparency, fiscal due diligence or privacy protection and the like — selectively or disproportionately to pressure CSOs because of their activities or views.*

Legislative amendments adopted during the period in response to Russian hybrid threats expanded the definition of "extremist activity", introduced the possibility of suspending CSOs, restricted access to information under the law on states of emergency and crisis, and created new obligations for CSOs to provide information under the National Security Law (Promo-LEX, 2025). These measures were not designed to target CSOs, but they broaden the legal basis for state scrutiny of the sector.

In practice, public institutions focused on disinformation and interference operations around the September 2025 parliamentary elections, including cases in which front non-profit organizations were used to channel illegal foreign funding (CSO Meter, n.d.-a). There is no evidence that

the new powers were used against genuine CSOs during the period. The ambiguous definition of extremism and the emergency-powers framework nevertheless create a latent risk of selective use in the future.

Trend. The trend is mixed, as the legal framework became more restrictive while enforcement remained focused on actors involved in hybrid threats rather than on civil society at large.

Score 3: There was no documented misuse of state powers against legitimate CSOs, but the broadened legal basis for security-related scrutiny of the sector is a structural risk.

A5 – Transparent and open public institutions

Standard. *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

The Law on Access to Information of Public Interest, adopted in 2023 and in force since January 2024, introduced proactive transparency obligations, simplified request procedures and clearer sanctions, and Moldova ratified the Council of Europe's Tromsø Convention (Access Info Europe, 2024). Most amendments proposed by CSOs during the drafting process were, however, rejected by the Ministry of Justice.

Implementation lags behind the law. Freedom House (2023) found limited understanding of transparency obligations among public bodies, particularly local authorities and state-owned enterprises, with procurement information often published late or withheld on generic grounds. In 2025, the State Chancellery and Parliament launched new participation and information portals, which improved access to baseline information, but inconsistent compliance at local level and in procurement continues to hamper the watchdog work of CSOs.

Trend. The situation is improving from a low base, with implementation outside central government now the main remaining gap.

Score 3: A modern transparency law and new digital tools support access to information, but uneven implementation, especially locally and in procurement, keeps the score below the top band.



Cluster B – Legal and Financial Framework for CSOs

What formal conditions shape CSO operations and sustainability?

B1 – Free establishment and operation

Standard. *Everyone can freely establish, join or participate in a CSO; CSOs are free to determine their own objectives and activities; and where registration as a legal entity is required, the procedure is clear, simple, quick and inexpensive. The state does not interfere in the internal governance and operations of CSOs; any monitoring, inspection or reporting is defined by law, proportionate to the CSO's size and activities, and not onerous.*

The 2020 Law on Non-Commercial Organisations provides a clear and simplified registration procedure and protects the internal governance autonomy of CSOs. The law was drafted with substantial input from civil society and removed earlier restrictions on participation in associations (CSO Meter, n.d.-a). Freedom of association remains one of the strongest aspects of the legal environment for CSOs in Moldova.

Registration practice remained stable, with no reports of systemic obstruction. Reporting obligations are largely self-declared and proportionate: the National Bureau of Statistics launched its first survey on CSO finances only in May 2026, on a voluntary pilot basis ahead of full rollout in 2027 (Biroul Național de Statistică, 2026). The main administrative burden reported by the sector concerns banking and anti-money-laundering compliance (see B4) rather than establishment or interference in internal governance.

Trend. The situation is stable, with no material legislative or practical change during the period.

Score 4: Establishment and operational autonomy are the strongest area of the legal framework, with no adverse developments during the period.

B2 – CSOs enjoy a safe space and protection from arbitrariness

Standard. *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

Dissolution and suspension of CSOs require judicial proceedings under the 2020 Law on Non-Commercial Organisations, but two legal risks are relevant. First, the security-related amendments adopted during the period (see A4) introduced for the first time the possibility of suspending CSOs, linked to the broader definition of extremist activity (Promo-LEX, 2025). Second, Article 28 of the 2020 law requires CSOs registered before 2020 to bring their statutes into conformity and re-register with the Public Services Agency or face forced liquidation (Agenția Servicii Publice, 2022), and practitioners report that the procedure has not always been clearly communicated.

No genuine CSO was suspended or dissolved under the new power during the period; its use has so far concerned front organizations linked to

disinformation around the 2025 elections. The re-registration requirement is procedural rather than politically targeted, but it remains a compliance risk that falls mainly on older, smaller and less-resourced organizations rather than on visible advocacy groups.

Trend. The situation deteriorated slightly in law and remained stable in practice, as the new suspension tool adds a risk that did not exist at the start of the period.

Score 3: Judicial safeguards remain in place and no genuine CSO was sanctioned, but the new suspension power and the unclear re-registration procedure are structural risks.

B3 – Liberality of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

Moldovan law imposes no restrictions on foreign funding and no "foreign agent" registration requirement; the 2025 opposition bill that would have changed this was not adopted (CSO Meter, 2025c). The main pressure on resourcing came from outside: the US foreign-aid freeze of January 2025 and the subsequent USAID cuts. USAID disbursements to Moldova amounted to around USD 150 million in 2024 (European Leadership Network, 2026), and Promo-LEX reported that USAID funds had covered 75–80% of its budget (Balkan Insight, 2025).

European donors, including the European Endowment for Democracy and the EU Delegation, which opened a EUR 12.5 million call for CSO proposals in 2026, partly compensated for the gap (European Endowment for Democracy, 2025; European Leadership Network, 2026). Organizations nevertheless reported layoffs and suspended activities. The episode shows

that the legal freedom to seek foreign funding does not ensure sustainable access to resources when a dominant donor withdraws, particularly as domestic philanthropy remains underdeveloped (see B4).

Trend. The situation deteriorated in practice despite a stable legal framework, as European support prevented a collapse but did not restore previous funding levels.

Score 3: There is no legal barrier to foreign or domestic funding, but the sector's heavy exposure to a single donor's policy shift shows a real gap between legal freedom and sustainable access to resources.

B4 – Enabling fiscal environment

Standard. *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures, and sanction regimes are applied to CSOs proportionately and on a risk basis.*

The 2% income-tax designation mechanism and the 2022 law clarifying philanthropy and sponsorship form the domestic fiscal base for CSOs. This base has repeatedly faced weakening proposals: 2023 amendments risked diluting the mechanism by extending it to public schools (CSO Meter, 2023), and in mid-2026 new Tax Code amendments under discussion raised concerns about beneficiary privacy and a further weakening of the mechanism (CSO Meter, n.d.-a).

CSOs also report excessive bureaucracy linked to ultimate beneficial ownership disclosure under anti-money-laundering rules, which are applied without the risk-based approach for non-profits recommended by the Financial Action Task Force (European Center for Not-for-Profit Law, 2026). Tax incentives for philanthropic donations and sponsorship

remain limited. Together, these factors keep domestic fundraising underdeveloped and reinforce the sector's dependence on foreign funding (see B3).

Trend. The situation is stagnant to slightly deteriorating, as no structural fiscal reform was completed and the main developments were new threats to the 2% mechanism.

Score 2: The fiscal environment offers basic tools but is under sustained pressure from weakening proposals, a disproportionate anti-money-laundering burden and limited tax incentives for giving.

B5 – Free expressions of criticism

Standard. *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

CSOs, activists and journalists were able to criticize public authorities openly during the period, and no case was identified of a CSO being sanctioned by the state for its views. The main gap concerned protection against abusive litigation: Moldova had no dedicated anti-SLAPP legislation, despite documented cases of abusive lawsuits against CSOs and journalists. Monitoring of attacks on CSOs and human rights defenders by the Legal Resources Centre from Moldova was cited in the European Commission's 2024 enlargement report, after which the Ministry of Justice started work on anti-SLAPP safeguards under the Roadmap on the functioning of democratic institutions (CSO Meter, n.d.-a).

A draft anti-SLAPP law was opened for public consultation in 2026, although CSOs considered that it fell short of commitments on the protection of human rights defenders (CSO Meter, 2026). The Government approved the anti-SLAPP package on 24 July 2026, after the assessment

period, and Parliament has yet to adopt it. Within the period, protection rested on general civil-procedure safeguards, leaving CSOs and journalists exposed to the costs and chilling effect of abusive lawsuits.

Trend. The situation is improving, as the anti-SLAPP process advanced during the period, although the Government approved the package only after it closed.

Score 3: Critical expression by CSOs and journalists remained possible throughout the period, but the absence of dedicated protection against abusive litigation keeps the score below the top band.



Cluster C – Public Engagement and Perceptions towards the Work of CSOs

How are CSOs perceived, and how do citizens engage with them?

C1 – Citizens' trust

Standard. *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

Public trust in CSOs is measured by the Public Opinion Barometer, conducted twice a year by the Institute for Public Policy since 1998. The autumn 2025 wave recorded an increase in trust in CSOs from 19% in 2024 to 28% in 2025 (IPN, 2025). The increase took place in a polarized

and sceptical society: the same survey found 32% trust in Parliament and only 43% of respondents believing the country was heading in the right direction (IPN, 2025).

Rising trust strengthens the legitimacy of CSOs, including in their relations with public institutions. At under a third of the population, however, confidence in CSOs remains a minority position.

Trend. Trust is improving substantially, having risen by nine percentage points in a single year.

Score 3: The strong upward trend is a positive signal, but at 28% public trust in CSOs remains well short of majority confidence.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

Legislative reforms adopted during the period strengthened the independence guarantees of the Audiovisual Council and the public broadcaster and regulated state advertising (Media Azi, 2026). Practice improved less. The Press Situation Index of the Independent Journalism Center rose only marginally in 2025, keeping the press in the "serious problems" category for the tenth consecutive year (Centrul pentru Jurnalism Independent, 2026), and Moldova fell four places, to 35th of 180 countries, in the Reporters Without Borders ranking (UNIMEDIA, 2025).

Moldova recorded 97 attacks on journalists in 2025, 47% more than in the previous year and the highest number since monitoring began in 2017 (Media Azi, 2026). This level of pressure on journalists narrows the space in which CSOs can expect fair, safe and pluralistic coverage of their work.

Trend. The situation is stagnant to worsening in practice, as legal improvements were offset by a record number of attacks on journalists and a lower international press-freedom ranking.

Score 2: Legal reforms are a step forward, but a record year of attacks on journalists and a falling international ranking show that the practical environment deteriorated.

C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities, volunteering, activism, donating, protest, and such participation is socially accepted and not penalized.*

A new Volunteering Law, harmonized with EU legislation, was adopted in second reading on 29 December 2025 and replaced the 2010 framework (Parlamentul Republicii Moldova, 2025). It lowers the minimum volunteering age to 14, regulates formal, informal, corporate and international volunteering, and replaces paper volunteer booklets with skills-based certificates (Moldova 1, 2025).

Civic engagement continued throughout the period, and no criminal or administrative penalties against citizens for peaceful civic participation, donations or volunteering were documented. No official national statistics measure volunteering rates or hours, which makes it difficult to assess participation trends. Once implementing regulations are in place, the new framework should make it easier for CSOs to recruit and retain volunteers.

Trend. The situation is improving, following a substantive, EU-aligned reform of the volunteering framework.

Score 3: A modernized legal basis for volunteering is in place, but the absence of national data on participation keeps the score below the top band.

C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.*

The Civil Society Development Programme 2024–2027 names local embeddedness and grassroots capacity as strategic priorities (CSO Meter, n.d.-b). Grassroots activity was documented during the period: a People in Need programme engaged more than 50 initiatives in ten districts on local budgeting, monitoring and advocacy (People in Need, n.d.), Norway committed NOK 45 million to civil society work for 2025–2028 (FundsforNGOs, 2025), and nine in ten of the roughly 135,000 Ukrainian refugees hosted in 2025 lived in host communities rather than in camps (Ukraine Crisis Analysis Team, 2026).

A May 2026 social-cohesion assessment found that, despite national-level polarization, relations between communities remain largely cooperative and that trust grows where grassroots initiatives deliver locally relevant results (Ukraine Crisis Analysis Team, 2026). Local CSOs nevertheless face persistent capacity constraints: insufficiently trained staff, limited access to funding and equipment, and less organizational experience than national CSOs based in Chișinău. Their ability to sustain community engagement without continued donor support therefore remains fragile, and mobilization capacity is uneven between project-supported districts and the rest of the country.

Trend. The trend is mixed, as donor-funded programmes deliver results where they operate but have not visibly narrowed the gap in organic local capacity.

Score 2: Grassroots mobilization and solidarity are real where donor-funded programmes operate, but persistent local capacity gaps mean that community embeddedness is not yet self-sustaining.

C5 – Freedom of assembly

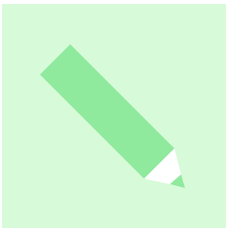
Standard. *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

Freedom of assembly is constitutionally guaranteed and has generally been respected in Moldova. On 15 May 2025, however, the Chișinău Municipal Council voted to ban public assemblies, demonstrations and "propaganda" related to gender identity and sexual orientation, mirroring a 2022 measure in Gagauzia (Radio Moldova, 2025).

Despite the ban, the 13th Moldova Pride march took place on 15 June 2025, as central law-enforcement authorities did not apply the municipal decision (Cotidianul, 2025). Police detained some counter-protesters who tried to break through the police cordon; claims of police brutality against marchers were identified as part of a pro-Kremlin disinformation narrative (EUvsDisinfo, 2025). The gap between a formally valid local ban and its non-enforcement by central authorities left organizers without legal certainty.

Trend. The situation deteriorated because of the explicit municipal ban on LGBTI-related assemblies.

Score 3: Assembly rights remain broadly respected, but the explicit municipal ban on LGBTI-related assemblies is a documented deterioration.



Cluster D – CSOs as Policy Makers

To what extent do CSOs influence and shape public policy?

D1 – Right to participate in decision-making including in the policy cycle

Standard. *Everyone has the right to participate in decision-making, and authorities use various mechanisms to ensure meaningful public and CSO participation.*

Public participation is currently regulated by the Law on Transparency in Decision-Making (No. 239) and Government Decision No. 967/2016. On 19 February 2025, the State Chancellery set up a working group of 35 civil society representatives and 21 public officials to draft a new Law on Public Participation in Decision-Making (CSO Meter, 2025b). The Government approved the draft on 22 July 2026, after the end of the assessment period (Logos-Press, 2026b).

Within the period, participation practice improved after Parliament and the Government launched new participation and information portals. CSOs obtained a structured and balanced role in drafting the main law governing their participation, although the binding guarantees it would introduce were not yet in force.

Trend. The situation is improving procedurally, with the substantive legal upgrade concentrated at, and just after, the end of the period.

Score 3: An inclusive drafting process ran throughout the period, but binding participation guarantees fall outside the assessment window.

D2 – Timely consultations and equal participation

> ***Standard.*** *Consultations are launched early, allow adequate time, and supply the information needed for substantive input.*

Current legislation does not set strong minimum consultation periods; the 2026 draft Public Participation Law would introduce clearer minimums. Practice varied considerably between dossiers. The anti-SLAPP draft law, for example, was consulted through a defined process linked to the Roadmap on democratic institutions (CSO Meter, 2026).

By contrast, Law No. 100/2025 was adopted in bulk on 30 April 2025, one day after being tabled, without any public consultation, in breach of Moldova's legislation on transparency in decision-making (CSO Meter, 2025d). Promo-LEX has repeatedly pointed to a broader pattern of normative acts approved through non-transparent procedures without genuine consultation (Promo-LEX, 2026). CSOs, particularly smaller and grassroots organizations, were thus excluded from providing input on a significant legislative package.

Trend. The situation is inconsistent, with consultation practice ranging from structured processes to its complete absence on major legislation.

Score 2: The unconsulted adoption of a major legislative package, part of a broader pattern, clearly breaches the core expectation of the standard.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

The Civil Society Development Programme 2024–2027 is a dedicated government strategy for cooperation with CSOs (CSO Meter, n.d.-b),

and the sixth Open Government Action Plan, launched in February 2026, provides a second cooperation track (Moldpres, 2026). The working group on participation legislation (see D1) is an active consultative body, and in 2026 the State Chancellery launched its first grant competition for CSO capacity building, awarding two projects a total of MDL 400,000, roughly EUR 20,000 (Telegraph.md, 2026).

An independent mid-term evaluation of the Programme, carried out by the Centre for Training and Organisational Consultancy (CICO) for the CONTACT Center and presented in January 2026, concluded that it had produced procedural rather than substantive change in how the state supports and cooperates with civil society (Comunicate.md, 2026). Beyond dialogue formats and modest pilot funding, concrete support measures remain limited, and CSOs continue to report non-transparent decision-making and poor access to data as obstacles to cooperation.

Trend. The trend is mixed, as the cooperation architecture is expanding but has not yet produced systemic change, with 2026–2027 identified by the evaluation as the decisive years.

Score 3: A cooperation strategy and several active consultative structures exist, including a first direct grant line for CSOs, but the independent evaluation found mostly procedural rather than substantive change.

D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion.*

No law classifies CSO advocacy as prohibited political activity. However, Article 472 of the Contravention Code ("Corruption for organised assemblies"), adopted on 30 April 2025 without consultation, penalizes providing financial means for participation in certain public assemblies (CSO Meter, 2025d).

In its March 2026 opinion, the Venice Commission compared the provision with a similar Armenian rule it had criticized for penalizing material incentives to participate in assemblies (Venice Commission, 2026). No prosecution of an advocacy CSO under the article was documented during the period, but organizations that cover participants' transport or other costs now face legal uncertainty, and the resulting chilling effect is so far anticipatory.

Trend. The situation deteriorated because of a vaguely drafted new contravention introduced without consultation.

Score 2: A vaguely drafted, unconsulted new provision creates a legal risk for CSO mobilization and advocacy financing.

D5 – Government listens

Standard. *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback.*

No binding mechanism requires authorities to explain how CSO input affected a final decision; the 2026 draft Public Participation Law would introduce a first step toward such feedback. In 2025, CSOs submitted 56 contributions on 35 draft normative acts, of which about a quarter were accepted (Moldova 1, 2026).

On the most significant files, responsiveness was lower. The May 2025 Roadmaps were adopted largely unchanged (CSO Meter, 2025a), and Law No. 100/2025 was adopted without any consultation (CSO Meter, 2025d). CSOs can therefore point to a partial record of influence alongside repeated instances of being bypassed on high-salience decisions.

Trend. The trend is mixed, with a concerning pattern in which the more politically significant the file, the less CSO input shapes the outcome.

Score 2: On the most consequential files of the period, responsiveness to CSO input was limited or absent.

Conclusion

Moldova's civic space in 2025–2026 is best described as legally open but practically fragile. With a composite score of 2.8 out of 4, the country sits between "Restrictive Leaning" and "Mostly Enabling". Its strongest features are structural: CSOs can be established and operate freely, there is no "foreign agent" regime or legal restriction on foreign funding, and the governing majority has largely refrained from stigmatizing rhetoric against civil society. In regional comparison, this places Moldova among the more open environments. Yet across most standards, it is the distance between the formal framework and everyday practice that determines the score.

The EU-accession process has been the main driver of positive change, producing a modern access-to-information law, a new volunteering law, an active cooperation architecture and a participatory drafting process for a new Public Participation Law. At the same time, the response to Russian hybrid interference around the 2025 elections produced security-driven measures, including a broader definition of extremism, a new CSO suspension power and a sanction on financing participation in assemblies, often adopted quickly and without consultation. None of these tools was used against genuine CSOs during the period, but together they create latent risks. The weakest cluster is CSOs as policy makers (2.4): CSOs are consulted more often than before, yet their input rarely shapes the most politically significant decisions. The abrupt loss of US funding further exposed the sector's dependence on foreign donors and the underdevelopment of domestic philanthropy.

Future monitoring should focus on whether the Public Participation Law and the anti-SLAPP package, both approved by the Government in July 2026, are adopted by Parliament without being weakened; how the new security-related powers are applied in practice; the fate of the 2% designation mechanism in ongoing Tax Code revisions; the sector's ability to diversify its funding; and whether the Civil Society Development Programme delivers substantive rather than procedural change in its decisive final years, 2026–2027.

References

1 Access Info Europe. (2024, November 7). *Strengthening transparency: New roadmap for Greece and Moldova to align access to information laws with global standards*. https://www.access-info.org/2024-11-07/strengthening-transparency-new-roadmap-for-greece-and-moldova-to-align-access-to-information-laws-with-global-standards/

2 Agenția Servicii Publice. (2022, August 18). *Organizațiile necomerciale trebuie să anunțe modificările în actele de constituire* [Non-commercial organisations must notify amendments to their founding documents]. https://www.asp.gov.md/ro/media/2022-08-18

3 Balkan Insight. (2025, March 13). *Moldova civil society struggles for solutions in face of USAID cuts*. https://balkaninsight.com/2025/03/13/moldova-civil-society-struggles-for-solutions-in-face-of-usaid-cuts/

4 Biroul Național de Statistică. (2026). *BNS lansează cercetarea statistică pilot privind cheltuielile de protecție socială și veniturile organizațiilor necomerciale* [NBS launches a pilot statistical survey on social protection expenditure and income of non-commercial organisations]. https://statistica.gov.md/ro/bns-lanseaza-cercetarea-statistica-pilot-privind-cheltuielile-de-protectie-12_62442.html

5 Centrul pentru Jurnalism Independent. (2026). *Indicele privind situația presei din Republica Moldova în anul 2025* [Press Situation Index in the Republic of Moldova in 2025]. https://cji.md/indicele-privind-situatia-presei-lansat-de-cji-mass-media-s-a-confruntat-cu-probleme-grave-si-in-anul-2025/

6 Comunicate.md. (2026). *Societatea civilă are un program național. Produce acesta schimbarea așteptată?* [Civil society has a national programme. Is it producing the expected change?]. https://comunicate.md/index.php?action=view&article_id=12672&task=articles

7 Cotidianul. (2025). *Moldova Pride 2025 march in Chișinău: Between demands for rights and tensions with Orthodox demonstrators*. https://cotidianul.md/en/6139/marsul-moldova-pride-2025-la-chisinau-intre-revendicari-pentru-drepturi-si-tensiuni-cu-manifestantii-ortodocsi/

8 CSO Meter. (n.d.-a). *Moldova: Country page*. https://csometer.info/countries/moldova

9 CSO Meter. (n.d.-b). *Moldova: Government adopts CSO Development Programme 2024–2027*. https://csometer.info/updates/moldova-government-adopts-cso-development-programme-2024-2027

10 CSO Meter. (2023). *Moldova: New amendments could jeopardise the designation mechanism for CSOs*. https://csometer.info/updates/moldova-new-amendments-could-jeopardise-designation-mechanism-csos

11 CSO Meter. (2025a). *Moldova: Government consults roadmaps for democratic institutions and rule of law*. https://csometer.info/updates/moldova-government-consults-roadmaps-democratic-institutions-and-rule-law

12 CSO Meter. (2025b). *Moldova: Government launches review of legislation on transparent decision-making through new working group*. https://csometer.info/updates/moldova-government-launches-review-legislation-transparent-decision-making-through-new

13 CSO Meter. (2025c). *Moldova: Opposition introduces draft foreign agents law in Parliament*. https://csometer.info/updates/moldova-opposition-introduces-draft-foreign-agents-law-parliament

14 CSO Meter. (2025d). *Moldova: Sanctions on paid participation in assemblies raise freedom of assembly concerns*. https://csometer.info/updates/moldova-sanctions-paid-participation-assemblies-raise-freedom-assembly-concerns

15 CSO Meter. (2026). *Moldova: Anti-SLAPP draft law open for public consultation but falls short of human rights defenders' protection commitment*. https://csometer.info/updates/moldova-anti-slapp-draft-law-open-public-consultation-falls-short-human-rights-defenders

16 Eastern Partnership Civil Society Forum. (2025). *Moldova's reform progress is real – despite what Russia wants you to think*. https://eap-csf.eu/articles/moldovas-reform-progress-is-real-despite-what-russia-wants-you-to-think/

17 European Center for Not-for-Profit Law. (2026). *New assessment outlines steps to increase financial sustainability of Moldovan civil society*. https://ecnl.org/publications/new-assessment-outlines-steps-increase-financial-sustainability-moldovan-civil-society

18 European Endowment for Democracy. (2025). *Moldova: A shifting landscape in pre-election times*. https://democracyendowment.eu/country-updates/moldova-a-shifting-landscape-in-pre-election-times-and-nbsp

19 European Leadership Network. (2026). *The day after: Future of development aid in Ukraine, Georgia and Moldova*. https://europeanleadershipnetwork.org/commentary/the-day-after-future-of-development-aid-in-ukraine-georgia-and-moldova/

20 EUvsDisinfo. (2025). *Brutal police intervention shows Moldova is a dictatorship under a rainbow flag* [Disinformation case]. https://euvsdisinfo.eu/report/brutal-police-intervention-shows-moldova-is-a-dictatorship-under-a-rainbow-flag/

21 Freedom House. (2023). *Freedom of information index: Measuring transparency of public institutions in Moldova*. https://freedomhouse.org/sites/default/files/2023-12/fh-Moldova_Access-to-Info-Report-12-2023_Eng.pdf

22 FundsforNGOs. (2025, November 13). *Building resilience and democracy: How Moldova is strengthening civil society*. https://news.fundsforngos.org/2025/11/13/building-resilience-and-democracy-how-moldova-is-strengthening-civil-society/

23 IPN. (2025). *Barometrul Opiniei Publice – septembrie 2025* [Public Opinion Barometer – September 2025]. https://ipn.md/barometrul-opiniei-publice-septembrie-2025/

24 Logos-Press. (2026a). *"Foreign agent" narrative undermines NGOs in Moldova*. https://logos-pres.md/en/news/narratives-about-foreign-agents-aim-to-discredit-ngos-opinion/

25 Logos-Press. (2026b). *Moldova's new government revamps public consultation rules*. https://logos-pres.md/en/news/the-new-government-is-changing-the-rules-for-public-consultations/

26 Media Azi. (2026). *Raport CJI: Legi mai bune pentru libertatea presei, însă cu aplicare deficitară și record de atacuri asupra jurnaliștilor în 2025* [CJI report: Better press freedom laws, but poor implementation and a record number of attacks on journalists in 2025]. https://media-azi.md/raport-cji-legi-mai-bune-pentru-libertatea-presei-insa-cu-aplicare-deficitara-si-record-de-atacuri-asupra-jurnalistilor-in-2025/

27 Moldova 1. (2025). *Voluntariatul, reglementat printr-o lege nouă* [Volunteering regulated by a new law]. https://moldova1.md/p/65462/voluntariatul-reglementat-printr-o-lege-noua-tinerii-pot-face-voluntariat-de-la-14-ani-iar-competentele-vor-fi-recunoscute-oficial

28 Moldova 1. (2026). *Civil society plays key role in aligning Moldova with EU standards*. https://moldova1.md/p/76728

29 Moldpres. (2026). *Moldova's State Chancellery launches process of developing new Open Government Action Plan*. https://www.moldpres.md/eng/official/cancelaria-de-stat-a-lansat-procesul-de-elaborare-a-noului-plan-de-actiuni-pentru-guvernare-deschisa-eng

30 Parlamentul Republicii Moldova. (2025). *Activitatea de voluntariat, reglementată de o lege nouă, armonizată cu legislația UE* [Volunteering regulated by a new law harmonised with EU legislation]. https://parlament.md/ns-newsarticle-Activitatea-de-voluntariat-reglementat-de-o-lege-nou-armonizat-cu-legislaia-UE.nspx

31 People in Need. (n.d.). *Moldova: Civil society and inclusive governance*. https://www.peopleinneed.net/what-we-do/humanitarian-aid-and-development/moldova/civil-society-inclusive-governance

32 Promo-LEX. (2025). *Promo-LEX launches the CSO Meter Moldova 2025 country report*. https://promolex.md/en/promo-lex-launches-the-cso-meter-moldova-2025-country-report-the-operating-environment-for-civil-society-organisations-remains-stable-despite-systemic-pressures-and-challenges/

33 Promo-LEX. (2026). *CSO Meter: Moldova 2025 country report* (Romanian ed.). CSO Meter. https://csometer.info/sites/default/files/2026-01/Moldova%202025%20Country%20Report%20RO.pdf

34 Radio Moldova. (2025). *Pride 2025 banned in Chișinău. GENDERDOC-M: Major human rights violation*. https://radiomoldova.md/p/51736/pride-2025-banned-in-chisinau-genderdoc-m-major-human-rights-violation

35 Telegraph.md. (2026). *Două ONG-uri vor primi finanțare de 400 de mii de lei de la Cancelaria de Stat* [Two NGOs to receive MDL 400,000 in funding from the State Chancellery]. https://telegraph.md/doua-ong-uri-vor-primi-finantare-de-400-de-mii-de-lei-de-la-cancelaria-de-stat/

36 Ukraine Crisis Analysis Team. (2026). *Bridging divides: Social cohesion, media and civil society in Moldova*. https://u-cat.squarespace.com/posts/non-uacat-report-bridging-divides-social-cohesion-media-and-civil-society-in-moldova

37 UNIMEDIA. (2025). *Indicele libertății presei a degradat în 2025: Moldova a pierdut patru poziții și a ajuns între Armenia și Costa Rica* [The press freedom index deteriorated in 2025: Moldova lost four places and ranks between Armenia and Costa Rica]. https://unimedia.info/ro/news/d88d886f8cd31838/indicele-libertatii-presei-a-degradat-in-2025-moldova-a-pierdut-patru-pozitii-si-a-ajuns-intre-armenia-si-costa-rica.html

38 Venice Commission. (2026). *Republic of Moldova: Opinion on Law No. 100/2025* (CDL-AD(2026)007). Council of Europe. https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2026)007-e

Hungary

Country Score: **Mixed – Enabling Leaning** Country Trend: ↔

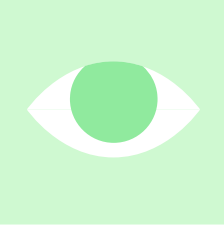
2.70



Cluster A: 2.60
A1 Equal treatment: 3
A2 Political recognition as partners: 3
A3 Refrained authorities from smearing: 3
A4 No weaponization of state powers: 2
A5 Transparent and open public institutions: 2



Cluster B: 3.00
B1 Free establishment and operation: 3
B2 CSOs enjoy a safe space: 3
B3 Liberty of resourcing: 3
B4 Enabling fiscal environment: 3
B5 Free expression of criticism: 3



Cluster C: 2.60
C1 Citizens trust: 3
C2 Present in media: 2
C3 Free engagement: 3
C4 CSOs embedded in communities: 3
C5 Freedom of assembly: 2



Cluster D: 2.60
D1 Decision-making participation: 2
D2 Timely consultations: 2
D3 Policies for cooperation: 3
D4 Free advocacy: 3
D5 Government listens: 3

8. Civic Space Report – Hungary

By Márton Schlanger, Hanga Milla Erdélyi, Cecília Földessy-Stiegemeier

Introduction

When it comes to the civil sector, Hungary is an important case study. On one hand, Hungary was one of, if not the most hostile environments for civil sector organizations within the EU in the past decade. On the other, after April 2026 and the landslide election victory of Tisza, the new governing party, the country's political landscape is changing rapidly. In this state of constant flux must we set up the baseline for civil sector development, which is no easy task. Civil sector regulation was not a priority during Tisza's first 100 days of governance, so the baseline we now set and the score we assign to Hungary can be considered ground zero for Tisza's civil sector policy. Still, when scoring, we must at the same time take into consideration Tisza's seemingly cooperative attitude towards the civil sector and the positive outlook, and also the fact that in many areas our only reference is what Fidesz did and what largely remains unchanged, with no explicit promise of immediate change on the horizon.

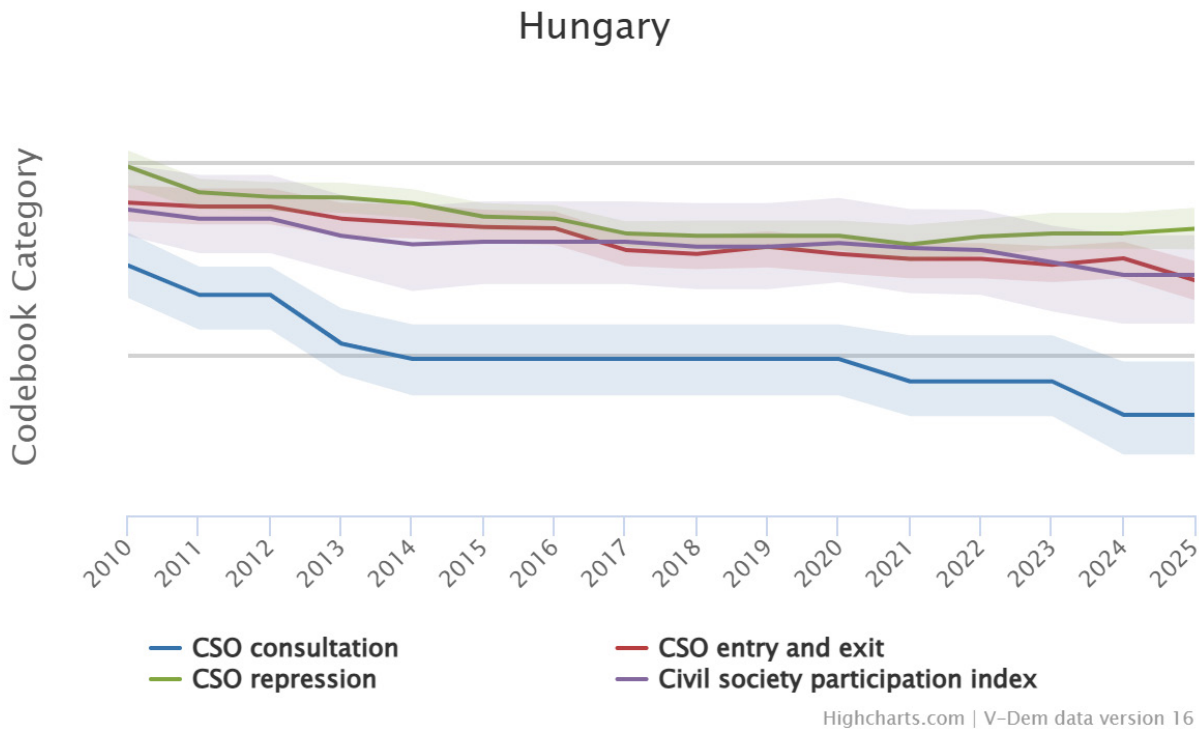


Figure 1 Hungary, civil society indicators 2010–2025. Source: V-Dem Institute (2025), Country Graph.

This assessment rests on desk research, primary legal sources, international monitoring output and five semi-structured interviews with senior CSO representatives (listed under Interviews). Because the period closes six weeks after the change of government, developments up to late August 2026 are cited where they are indispensable for establishing the direction of travel; these are dated explicitly.



Cluster A – Institutional and Political Environment and Narratives of CSOs

How do political institutions interact with and portray CSOs?

Cluster A is where the discontinuity of 2026 is most visible and also most superficial: conduct and rhetoric changed almost overnight, the architecture that made hostile conduct possible changed far less.

A1 – Equal treatment

> ***Standard.*** *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

Formally, Hungarian law makes no distinction between CSOs by orientation; establishment and court registration are governed by uniform rules. The exception is Act XLIX of 2021 — the so-called Lex NGO — which subjects every association and foundation with a balance-sheet total of at least HUF 20 million to annual State Audit Office (Állami Számvevőszék, *ÁSZ for short*) scrutiny, while exempting sports, religious, national-minority and party-linked bodies. Its trigger is size rather than conduct, but the exemptions make it selective.

In practice the inequality was fiscal and administrative. Interviewees reported administrative burdens imposed strategically on critical organizations, with the ÁSZ and the Sovereignty Protection Office

investigating Transparency International Hungary and Átlátszó, the two most influential anti-corruption watchdogs (Gyori, 2024). On the funding side, roughly 90% of the budgets of the largest schemes went to government-affiliated organizations in the three years to 2024 (Bódis, 2024), while grant lines for human rights or democratic values did not exist (Mora, 2024).

The Tisza government contests this practice, undertaking that CSOs should receive central funding in a transparent, professionally justified and non-partisan manner; on 18 August 2026 the Prime Minister's Office published an interactive map of the roughly HUF 400 billion disbursed to CSOs between 2022 and 2026 (Miniszterelnökség, 2026; Telex, 2026). Sector bodies warn, however, that publishing recipients without examining individual decisions casts collective suspicion on locally rooted associations (Esély és Részvétel, 2026). The two-tier sector inherited from the previous era remains materially intact.

Trend. Improving in intent, unchanged in structure: the selective statutory trigger and the accumulated funding asymmetry both survive into the new period for now.

Score 3 – Mostly enabling: The legal baseline for establishment and registration is formally equal and the discriminatory funding practice has been publicly disavowed and opened to scrutiny by the government itself, but Lex NGO's selective exemptions and the funding asymmetry both still stand.

A2 – Political recognition as partners

Standard. *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

No general statutory duty obliges Hungarian public bodies to treat CSOs as partners; recognition depends on political will. Under Fidesz, meetings were convened periodically, primarily to satisfy reporting obligations towards the United Nations and the European Union, but interviewees described them as one-sided and futile. The Anti-Corruption Task Force supporting the Integrity Authority is the emblematic case: several independent CSOs were invited to join, yet Transparency International Hungary signalled early on that its positions were disregarded entirely (Mora, 2024).

The change of government produced an immediate change of atmosphere. The State Secretary for Civil Relations, József Pótor, convened civil society actors within weeks of the April 2026 election and undertook that CSOs would be included in decision-making; the civil portfolio was given ministerial rank under Zoltán Tarr. The first real test came in summer 2026 over the "heartbeat regulation", anti-abortion legislation adopted by the previous parliament without civil dialogue. When the Minister of Health signaled that he would consult a narrower "professional" circle excluding reproductive and women's rights organizations, eighteen CSOs sent a joint open letter requesting inclusion (Iványi, 2026); he convened a panel with all signatories by the end of July 2026.

The material effect is real but personalized: access depends on the responsiveness of individual ministers and on CSOs' capacity to press for it rather than on any institutional entitlement — a fragile basis, but a decisive improvement on adversarial framing.

Trend. Clearly improving during the reference period, though only very recently and on a case-by-case basis, not yet secured by any institutional guarantee.

Score 3 – Mostly enabling: The government began engaging CSOs as legitimate partners within weeks of taking office and responded substantively when pressed, but recognition rests on ministerial goodwill rather than on real institutional entitlement.

A3 – Refrained authorities from smearing

Standard. *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

Hostile narrative was among the previous government's most consistently used instruments against democratic, human rights and anti-corruption organizations. In his nationally televised address of 15 March 2025 — inside the assessment period — Viktor Orbán described government-critical actors, CSOs among them, as "bedbugs" (Presinszky, 2025). State media categorized organizations as Soros mercenaries or threats to national sovereignty, principally because they defended minority rights or received support from the Open Society Foundation, USAID or the EU's CERV programme (Mora, 2024). The Sovereignty Protection Office, Orbán's Kremlin-style, hand-controlled anti-civil authority gave the narrative statutory backing, voicing "concerns" about critical CSOs' independence in annual reports built on fabricated conspiracy claims (Government of Hungary, 2026).

Since April 2026 the Magyar government has refrained from delegitimizing rhetoric and has not positioned CSOs as ideological targets. Its sovereignty framing is pragmatic, and financial transparency is presented as a mutual obligation binding government and sector alike; the governing party's position is that civil society is "not a burden, but a resource" (Tisza Party, 2026). One interviewee whose organization was founded after the peak of the Soros campaigns reported that their residual self-censorship has noticeably subsided since the election.

One risk deserves recording. The framing accompanying the August 2026 funding map — that resources may have flowed disproportionately to organizations tied to the former governing parties — has been criticized as an inverted form of collective stigmatization, since the database identifies recipients without distinguishing political capture from ordinary local activity (Világgazdaság, 2026).

Trend. Strongly improving; official smearing has ceased, though the new government's transparency communication carries a stigmatization risk to monitor in the next cycle.

Score 3 – Mostly enabling: Official smearing has ceased entirely, but goodwill rests on political choice rather than on any safeguard, and disproportionate hostility towards organizations which received government funding before 2026 might hurt some legitimate CSOs down the line.

A4 – No weaponization of state powers and good governance principles

> ***Standard.*** *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, emergency measures, or principles such as transparency and fiscal due diligence — selectively or disproportionately to pressure CSOs because of their activities or views.*

The most important development of the period is the abolition of the Sovereignty Protection Office, after a parliamentary vote on 30 June 2026 (Human Rights Watch, 2026). The Office had subjected organizations to arbitrary investigation on vague charges of serving foreign interests, with no avenue to contest its findings; the CJEU advocate general concluded in February 2026 that its mandate infringed fundamental rights. No new targeted tax or ÁSZ audits have been reported since April 2026.

The inherited apparatus nonetheless remains largely intact. The ÁSZ's Lex NGO mandate is untouched, the Office for the Protection of the Constitution retains its surveillance capacity and cyber-tooling (Bodoky, 2026), and no remedy has been offered to organizations investigated under the abolished Act. More significantly, the new majority has built rather than dismantled institutional capacity: Act XXXIV of 2026, adopted on 28 July under the Seventeenth Amendment to the Fundamental Law,

created the National Asset Recovery and Asset Protection Office (NVVH) with independent investigative and prosecution powers across civil, administrative, tax and procurement proceedings (Portfolio, 2026).

It touches the sector directly: from September 2026 the Civil Act (§ 10/E(3)) and the Civil Registration Act are amended so that an association or foundation notified by the NVVH may not merge, and NVVH measures are entered in the court register (Esély és Részvétel, 2026). The stated purpose — recovering misappropriated public assets — is legitimate, but the architecture of selective institutional pressure has been added to, not retired.

Trend. Improving in practice, ambiguous in design: the abolition of one instrument coincided with the creation of another whose reach over CSOs is untested.

Score 2 – Restrictive leaning: Although the single worst instrument of institutional pressure was abolished, the ÁSZ's Lex NGO mandate, the intact surveillance apparatus and the NVVH's new powers over CSO mergers leave the machinery of selective pressure fully available and, in one respect, expanded.

A5 – Transparent and open public institutions

> ***Standard.*** *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

The formal framework — Act CXII of 2011 on freedom of information, alongside Hungary's Aarhus Convention obligations — is adequate on paper, but its use was systematically obstructed through cost charging, refusals invoking excessive workload and protracted litigation, and through

the removal of large volumes of public spending into public-interest asset management foundations (KEKVA) beyond the reach of ordinary transparency rules.

The new government has committed to building an accessible, transparent public structure, and two steps support that commitment: the legislative dismantling of the KEKVA construction, which permitted covert control over institutions and funding streams (Márton & Csurgó, 2026), and the proactive publication of five years of civil support data (Miniszterelnökség, 2026). Ministerial responsiveness has improved, as the health portfolio's roundtable illustrates.

Access to decision-making, by contrast, remains ad hoc. Interviewees describe an environment in which CSOs must monitor parliamentary debates and individual politicians' social media channels in order to learn what is being prepared, and must proactively request inclusion whenever they judge their expertise relevant. There is no consolidated, published government agenda and no standing channel for civil feedback; sector organizations have submitted detailed proposals on precisely this point, including on linking the statutory monitoring system for state support with a public transparency interface (Esély és Részvétel, 2026). Openness is improving through disclosure, but not yet through predictable process.

Trend. Improving, driven by discrete acts of proactive disclosure rather than by any structural reform of access to information or to the policy pipeline.

Score 2 – Restrictive leaning: Openness has improved only through discrete and discretionary acts of disclosure, while the structural problem is untouched: there is no published government agenda, no standing channel for civil feedback, and no reform of the freedom-of-information practice that was systematically obstructed before 2026.



Cluster B – Legal and Financial Framework for CSOs

What formal conditions shape CSO operations and sustainability?

Cluster B records the largest formal improvement of the period — removal of the foreign-agent element — against an otherwise static statute book and an unreformed funding architecture. The direction is positive, but it is too early to treat the gains as consolidated.

B1 – Free establishment and operation

> ***Standard.*** *Everyone can freely establish, join or participate in a CSO; CSOs determine their own objectives; registration is clear, simple, quick and inexpensive. The state does not interfere in internal governance, and monitoring or reporting is defined by law, proportionate and not onerous.*

Establishment is a right, not a license: associations and foundations are registered by the county courts under Act CLXXXI of 2011, free of charge and without prior authorization, and organizations determine their own objectives. The associative space is correspondingly populous: in 2023 Hungary had 18,242 foundations and 35,405 associations, making classic civil organizations 88% of all nonprofit entities (KSH, 2024). Formation has never been the binding constraint here.

The weaknesses lie in operation. Court practice is formalistic and slow, reporting is duplicated across the courts, the National Office for the Judiciary and the tax administration, and Lex NGO adds an annual layer of ÁSZ scrutiny above the HUF 20 million threshold — low enough to capture

any professionalized advocacy organization while exempting comparable bodies elsewhere. Public benefit status, which unlocks the more favorable tax treatment, is conditioned on eligibility tests that many small and rural organizations cannot meet.

Interference in internal governance has not been systemic, and no politically motivated refusal of registration was reported in the assessment period. One new element requires monitoring: from September 2026 an association or foundation notified by the newly created NVVH may not merge with another; a restriction inserted into the Civil Act without sector consultation and drawn more broadly than the asset-recovery purpose requires (Nonprofit.hu, 2026).

Trend. Stable. Entry conditions are unchanged and unproblematic; the operational compliance load is unchanged and disproportionate, with one new statutory restriction added at the very end of the period.

Score 3 – Mostly enabling: Establishment is genuinely free and internal autonomy is respected, which places the standard well above the midpoint, but the duplicated reporting obligations, the low Lex NGO audit threshold and the newly inserted merger restriction are still a concern.

B2 – CSOs enjoy a safe space and protection from arbitrariness

> ***Standard.*** *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

Dissolution and suspension are reserved to the courts under the Civil Code and the Civil Act, on enumerated grounds and subject to appeal, and no CSO was dissolved or suspended on political grounds in the period. The threat operated instead through investigation and exposure: the Sovereignty Protection Act allowed the Office to compel cooperation, threaten summonses before the National Security Committee and

publish findings that targeted organizations had no means of contesting (Government of Hungary, 2026) — a sanction in substance without the safeguards attaching to one in form.

That instrument was removed on 30 June 2026, its assets and mandate passing to the Ministry of Justice (Human Rights Watch, 2026). The courts also produced protection: after the Court of Justice struck down the 2021 "child protection" legislation on 21 April 2026, prosecutors dropped the criminal proceedings against the organizers of the 2025 Budapest Pride, who had faced up to a year's imprisonment (France 24, 2026).

Two issues still hinder the final score. No remedy or review has been offered to organizations investigated under the abolished Act, and the disposition of the data gathered on them remains unresolved. Nor has any prompt, impartial investigation followed into alleged privacy and surveillance violations affecting civic actors, despite credible reporting on the use of state and private intelligence capacity against political targets (Bodoky, 2026). Protection improved because the threat was withdrawn, not because the safeguards were strengthened.

Trend. Improving decisively at the level of exposure to arbitrary measures, while the remedial and investigative dimension of the standard remains unaddressed.

Score 3 – Mostly enabling: The main source of arbitrary pressure was removed by law and the courts actively protected civic actors during the period, while the complete absence of remedy, review or investigation for those already targeted prevents a higher score.

B3 – Liberty of resourcing

Standard. *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

Hungary no longer has a foreign-agent directive in force. Act LXXVI of 2017 on the transparency of foreign-supported organizations was repealed in 2021 after the Court of Justice found it incompatible with EU law, and its replacement shifted the statutory trigger from the origin of funding to balance-sheet size (Act XLIX of 2021). The decisive event of the period was the defeat of the attempt to reinstate the model: the "Transparency of Public Life" bill of 13 May 2025 would have permitted blacklisting of any entity receiving foreign funds, including even EU grants, obliged the tax authority and banks to screen every foreign transfer, and enabled sanctioning, defunding and dissolution of listed organizations (ECNL, 2025). It drew an open letter from 347 organizations to the European Commission and was withdrawn from the parliamentary agenda (Liberties, 2025).

With the Sovereignty Protection Office abolished, foreign and international funding carries neither a legal penalty nor an official stigma (Human Rights Watch, 2026). This matters disproportionately in Hungary, where the independent sector's dependence on CERV, EEA and Norway Grants and private international donors is a direct consequence of its exclusion from domestic public funding.

The remaining constraint is economic rather than legal. The 2025 withdrawal of USAID funding removed a significant funding opportunity for relevant civil actors at short notice -- though it is not something the Hungarian government, rather the US administration decided -- and Lex NGO still marks larger foreign-funded organizations for annual audit. Freedom to resource is restored; the resource base is not.

Trend. Markedly improving: an attempted major restriction was defeated within the subject period and the principal enforcement body was abolished at its close.

Score 3 – Mostly enabling: Hungary now has no foreign-agent regime, with the one remaining reservation, Lex NGO's audit trigger for larger foreign-funded organizations being too narrow to justify a score of 2 but still ever present.

B4 – Enabling fiscal environment

Standard. *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures, and sanction regimes, are applied to CSOs proportionately and on a risk basis.*

Hungary's flagship fiscal instrument is the 1+1% personal income tax designation, which allows every taxpayer to direct one per cent of income tax to a qualifying nonprofit. It reaches small and rural organizations more evenly than budgetary support does and is the most widely used form of civic support in the country (see C3). Beyond it the incentive structure is thin: corporate donations are deductible, but individual donations attract no income tax relief, so private philanthropy has no fiscal encouragement outside the designation mechanism, and public benefit status is gated by tests that exclude much of the sector.

The structural consequence is visible in the aggregate data: classic civil organizations are 88% of nonprofit entities but command only 32% of nonprofit revenue (KSH, 2024), leaving the associative sector dependent on state schemes whose allocation was politically steered throughout the previous period.

On the AML/CFT limb the period contains a warning rather than a realized harm. The May 2025 bill would have converted anti-money-laundering supervision into a political screening mechanism, obliging banks and the tax authority to assess every foreign transaction by reference to its anticipated influence on public life (ECNL, 2025). It was not adopted, but it showed how readily the framework can be repurposed and left banks cautious about foreign-funded clients; no risk-based assessment of nonprofit exposure has been published. A review of the National Cooperation Fund and of civil financing was ordered for 1 August 2026 (Economx, 2026); no fiscal measure had followed by the close of the period.

Trend. Unreformed. Major rework is needed to improve and diversify CSO funding opportunities, more just and equal treatment is needed on the regulation side, as well as the encouragement of active participation and philantrophy. Many CSOs face immense loss of funds after the elections as citizens thought about philanthropy as a temporary need, a way to fund a regime change, not a tool to build a more resilient and active society.

Score 3 – Mostly enabling: The 1% designation mechanism, while criticized, is stable and widely available and there is no fiscal instrument deployed against CSOs during this period, but it is the weakest score 3 in the assessment: philanthropy incentives remain thin, AML supervision came close to being repurposed in 2025, and the announced financing review has yet to produce anything.

B5 – Free expressions of criticism

Standard. *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

Freedom of expression is protected by Article IX of the Fundamental Law, and Hungarian law contains no restriction on CSO criticism of government as such. The pressure operated through other channels: investigations by the Sovereignty Protection Office, sustained campaigns in state-controlled media, and the reputational cost of being named in the Office's annual reports. Criminal defamation and "scaremongering" provisions remain on the statute book and are available for use, and Hungary has no dedicated anti-SLAPP protection, notwithstanding that the transposition deadline for the EU Anti-SLAPP Directive (2024/1069) fell inside the assessment period in May 2026.

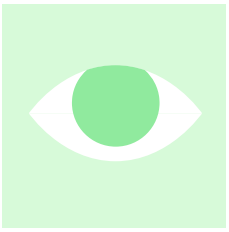
Practice has improved sharply. With the Office abolished and state-media campaigns discontinued, the principal sources of legal and reputational intimidation have been removed, and the government has submitted

legislation to restructure public media around pluralism and diversity of opinion (Magyar, 2026). Interviewees report that the self-censorship they practiced throughout the previous period has substantially receded since April 2026, which is the clearest available indicator that the standard is now being met in substance.

The material effect on CSOs is therefore positive but under-secured. Nothing in the legal framework would prevent a future government from resuming the same pattern, and organizations facing abusive litigation still have no procedural protection specific to public participation. Watchdog output continued unimpeded through the period and into the new one, including investigative reporting on intelligence activity directed at political actors (Bodoky, 2026).

Trend. Improving, but on the basis of forbearance rather than legal guarantee; the protective gap identified by the Anti-SLAPP Directive remains open.

Score 3 – Mostly enabling: Criticism can now be voiced without legal or reputational penalty and interviewees confirm that self-censorship has receded, yet the absence of anti-SLAPP protection and the survival of criminal defamation and scaremongering provisions leave the improvement unsecured.



Cluster C – Public Engagement and Perceptions towards the Work of CSOs

How are CSOs perceived, and how do citizens engage with them?

Cluster C is the weakest of the four and the one least affected by the change of government: attitudes and participation patterns are sedimented, media structures change slowly, and the assembly framework has not been amended at all.

C1 – Citizens' trust

> ***Standard.*** *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

The most recent representative evidence, from Political Capital and the Civilisation Coalition, found that around three-quarters of respondents consider the work of CSOs important. Education is the strongest predictor: the more educated the respondent, the more likely they were to regard civil work as crucial. Partisanship matters too — Tisza voters were nearly twice as likely as Fidesz supporters to express sympathy for the sector (Political Capital & Civilisation Coalition, 2025). Legitimacy, in other words, survived sixteen years of official hostility largely intact.

Belief in effectiveness is a different matter. Asked to rate the civil sphere's effectiveness on a five-point scale, respondents clustered on the midpoint, and here neither demographic nor partisan factors were of particular importance (Political Capital & Civilisation Coalition, 2025). The Hungarian public thus holds CSO work in high regard in principle while remaining

sceptical about what it achieved in practice under the previous regime; a distinction that reflects the sector's real exclusion from resources and decision-making rather than a judgement on its competence.

No known polling has been conducted under the new government. One interviewee from Háttér Society reported a marked increase in societal expectation since the election, theorizing that in a newly opened political system the public expects rapid change and now looks to CSOs to advocate on its behalf. If representative, the sector faces rising demand and reputational exposure without any corresponding increase in capacity.

Trend. Stable, with a plausible but as yet unmeasured post-election increase in expectation; the legitimacy–effectiveness gap is the durable feature. As mentioned before, according to CSO leaders, people are less keen on funding CSOs since the election, but this is not a trust issue, rather than a result of the regime change.

Score 3 – Mostly enabling: Consistently high regard for CSO work found across roughly three-quarters of respondents, but the public assessment of the sector's effectiveness is unfavourable.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

The United Nations Human Rights Council raised repeated concerns about the absence of media pluralism in Hungary, and the deficit transmitted directly into CSO representation (Gerő et al., 2023). Government-critical and non-GONGO organizations were either absent from state-controlled outlets altogether or subject to sustained smear campaigning; the majority responded by shifting their communications to social media platforms and building direct audiences there (Gerő et al., 2023).

Structurally, the concentration of the commercial media market achieved through the KESMA conglomerate, and the long fixed terms of media-regulator appointments made under the previous rules, were unaffected by the election.

The new government has not addressed CSO media representation as such, but has submitted legislation restructuring public service media around restored pluralism and diversity of opinion (Magyar, 2026).
It is reasonable to expect wider coverage of civil society actors to follow, though at the close of the assessment period no precedent had been set and no change in coverage patterns could be measured.

The material effect on CSOs is significant and persists: outside the independent online outlets and their own social media channels, most organizations still have no reliable route to a general audience. This constrains fundraising, volunteer recruitment and the public legitimacy on which advocacy depends, and it is the principal mechanism by which the high abstract regard recorded under C1 fails to convert into engagement. Due to the regime change, as Fidesz's media was funded largely through the problematic appropriation of public funds, media outlets that would often feature the previous government's anti-CSO messages are disappearing due to lack of funding, which decreases misrepresentation of CSOs in media.

Trend. Early positive signals from the public media reform, with the underlying ownership and regulatory structures unchanged and no substantial, measurable improvement in coverage yet.

Score 2 – Restrictive leaning: Not enough has changed yet, the structural causes of misrepresentation, such as market concentration and fixed-term regulator appointments remain, and independent news outlets who rely on crowdfunding notice a downtick in contributions after the regime change, making their position, in some cases, more difficult than before.

C3 – Free engagement

Standard. *Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.*

Participation is broad but shallow. In the Political Capital and Civilisation Coalition study, 82% of respondents had engaged with or helped a CSO in the preceding three years, but most did so through the 1% tax designation. Direct monetary or in-kind donation was reported by 31%, while personal engagement was markedly rarer: 13% had volunteered, 6% were current members and 5% former members of an organization (Political Capital & Civilisation Coalition, 2025). Official statistics point the same way, with the number of volunteers in classic civil organizations declining from 381,000 to 373,000 (KSH, 2024).

Part of this hesitance is attributable to the reduced social appeal of the sector after years of smear campaigning: 13% of non-helping respondents identified lack of trust as their reason for inaction (Political Capital & Civilisation Coalition, 2025). Interviewees, however, consistently reported that local engagement is stronger than national figures suggest. The EMMA Association, for example, runs a programme built on an extensive network of local volunteers in a small village near Miskolc.

Legally, civic participation is neither penalized nor conditioned, with one significant carve-out: participation in assemblies contravening the child protection provisions carries administrative fines and, for organizers, criminal exposure (see C5). For the LGBTQI+ community and those who publicly support it, participation therefore continued to carry legal risk throughout the assessment period, even where that risk was not enforced.

Trend. Stable. Neither the volume nor the character of civic participation shifted materially during the period, and the single legal restriction on participation remains in force. Civil engagement is free but relatively low.

Score 3 – Mostly enabling: Participation is legally unimpeded and very widely practised, while the shallowness of that participation and low volunteer numbers still pose a problem.

C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.*

Hungarian CSOs are generally well embedded in their immediate environments and their work is well regarded, but mobilization capacity is limited, because the dominant form of support — the tax designation — creates no relationship that can be activated. The membership and volunteering figures under C3 are the constraint: with only six per cent of the population as CSO members across the entire sector cannot readily convert public approval into widespread solidarity.

Interviewees reported that cooperation with local decision-makers — mayors, municipalities, local entrepreneurs — was highly dependent on individual attitudes during the previous era, with hostile stances gravely hindering outreach. Notably, most Fidesz-affiliated local stakeholders were welcoming towards CSO projects so long as the work remained local and no counter-instruction arrived from the national party office. That configuration has now inverted: the national government has changed while most municipalities remain Fidesz-affiliated, so the pressure from above has lifted without any settled new pattern having emerged.

There is countervailing evidence of latent mobilization capacity.
The 2025 Budapest Pride drew between 100,000 and 200,000 participants

in defiance of a police ban, becoming the largest anti-government demonstration in years, with many first-time attendees mobilized by the democratic stakes rather than by the specific cause. This demonstrates that solidarity can be mobilized in defence of civic space; it does not demonstrate that individual CSOs command constituencies of their own. Finally, the rise of Tisza could be interpreted as a sign of innate civic reflexes, seeing how one of the biggest novelties of Tisza's campaigning were the quasi-grassroots "Tisza-islands". These locally embedded activist groups resembled the Civic circles of early Fidesz, but within this argument lies the counterargument itself, as Fidesz's Civic circles all but dispersed eventually, and already, Tisza islands struggle with a lack of direction and a kind of identity crisis post election victory. It is fair to conclude that these groups are more part of the party system than the civil sector.

Trend. Stagnant, with a structural opportunity opening at local level that had not translated into measurable change by the end of the period.

Score 3 – Mostly enabling: CSOs are genuinely rooted in their immediate communities and that solidarity in defence of civic space can be mobilised at scale when it is needed, while the thin membership base and the unsettled relationship with Fidesz-held municipalities keep the standard short of a score of 4.

C5 – Freedom of assembly

> ***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

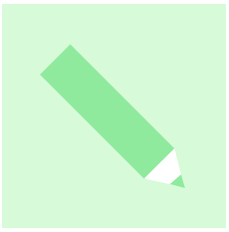
The legal position is unchanged from the Orbán era. The amendment of 18 March 2025 prohibits holding or attending assemblies that contravene the child protection legislation — those depicting or promoting divergence from birth sex, gender reassignment or homosexuality — with fines up to

HUF 200,000 for participants, up to a year's imprisonment for organizers, and express authorization for facial recognition (Fazekas, 2025). The Fifteenth Amendment entrenched the prohibition constitutionally. Both remain in force; the new government has criticized the legislation without repealing it.

Practice diverged sharply from law. The 2025 Budapest Pride was held on 28 June despite the police ban, drawing 100,000 to 200,000 people, and police brought no proceedings against participants; weekly protests ran unimpeded from March to July 2025. After the Court of Justice struck down the underlying 2021 legislation on 21 April 2026, Budapest police approved the 2026 Pride on 29 May, prosecutors dropped the charges against the 2025 organizers, and the march took place on 27 June 2026. Assembly outside this carve-out was not restricted at any point.

Trend. Improving in practice and through litigation, unchanged in law; the reversal is administrative and revocable, not legislative.

Score 2 – Restrictive leaning: De jure restricted, de facto non-enforced. Discriminatory statutory and constitutional restriction on a defined category of assembly remains in force and unrepealed, while its non-enforcement, its defeat in litigation and the otherwise unimpeded exercise of assembly rights make the score a strong 2.



Cluster D – CSOs as Policy Makers

To what extent do CSOs influence and shape public policy?

Cluster D captures the defining tension of the period: a government that engages willingly but has not built the machinery through which engagement becomes influence. All interviewees expressed patience about the transition while insisting that structured consultation mechanisms remain essential.

D1 – Right to participate in decision-making including in the policy cycle

> ***Standard.*** *Everyone has the right to participate in decision-making, and authorities use mechanisms ensuring meaningful public and CSO participation, with redress for non-compliance, across the whole policy cycle and without discrimination.*

Act CXXXI of 2010 on public participation in the preparation of legislation obliges ministries to publish draft legislation for general consultation and to publish a summary of the opinions received. Its weaknesses are structural: the obligation binds ministries but not individual members of parliament, it admits broad exemptions for urgent legislation, and it provides no redress whatsoever for non-compliance. The private member's bill was accordingly the standard route for circumventing consultation — both the March 2025 assembly amendment and the May 2025 "Transparency of Public Life" bill were submitted by individual MPs and escaped public consultation entirely (ECNL, 2025).

Under the new government, participation has become real but remains case-by—case and informal. Access depends on CSOs identifying relevant processes themselves and requesting inclusion, which favours organizations with the staff to monitor parliament, ministries and politicians' communications continuously. Participation across the later phases of the policy cycle — implementation and monitoring — is essentially absent, and no mechanism exists through which an excluded organization could obtain inclusion as of right.

The material effect is a sector in which a small number of well-connected organizations now have genuine access, while the rest depend on being invited. The heartbeat regulation episode is instructive in both directions: eighteen organizations obtained a ministerial hearing, but only by writing a joint open letter to secure what a functioning mechanism would have provided automatically (Iványi, 2026).

Trend. Improving substantially in practice from a very low base, with the formal guarantees and the redress gap unchanged.

Score 2 – Restrictive leaning: See A2. Statutory right to participate binds only ministries, admits broad exemptions and carries no redress whatsoever, so that the real improvement in practice since April 2026 depends on invitation and self-mobilisation rather than on any enforceable entitlement. CSOs are referred to as partners but real influence over policy is low.

D2 – Timely consultations and equal participation

Standard. *Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible, so that grassroots and under-resourced CSOs are not excluded due to limited means.*

Consultation timelines are the most consistently reported obstacle in the interviews conducted for this assessment. One interviewee was given a single weekend to review draft legislation falling squarely within their organization's field of expertise. Another withdrew from a consultation altogether, judging the timeframe too short to produce a comprehensive submission, and instead forwarded findings from an earlier report; a rational response that nonetheless converts consultation into a formality.

The formal framework does not remedy this. Act CXXXI of 2010 sets no effective minimum period, and the general consultation obligation is routinely satisfied by publication windows too short for organizations without dedicated policy staff. Nothing in Hungarian law or practice resources participation: there is no support for travel, staff time or expert input, no systematic provision for online participation designed around under-resourced organizations, and no accessibility requirement. The predictable result is that participation defaults to professionalized, Budapest-based organizations; a pattern consistent with the concentration of nonprofit revenue documented under B4.

The character of the constraint has changed with the government, but not its magnitude. Where exclusion was previously by design, it is now a by-product of transition and administrative capacity. CSO representatives were explicit that they need transparent agendas, identified points of contact and an established feedback mechanism, and equally explicit that they regard the absence of these as a long-term risk rather than a short-term inconvenience.

Trend. Stagnant. Timeframes and resourcing did not improve during the assessment period, and no procedural reform has been announced.

Score 2 – Restrictive leaning: Consultation windows remain too short for substantive input, as the interviews document, and nothing in law or practice resources participation, so under-resourced and non-Budapest organizations are effectively excluded regardless of the government's intentions.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

Hungary has no national civil society strategy. The institutional infrastructure that exists derives from the Civil Act: the National Cooperation Fund (NEA) with its sectoral colleges, which include delegates elected by CSOs themselves, the Civil Information Portal and the network of Civil Information Centres. On paper this is a genuine cooperation framework; in practice the colleges' composition and the Fund's allocation were politically steered, and the participatory element functioned as legitimation rather than as influence.

The new government has made cooperation an explicit organizing commitment. The civil portfolio was given ministerial rank alongside a dedicated State Secretariat for Civil Relations; the government adopted a formal decision published in the Hungarian Gazette requiring a full review of the NEA and of the civil financing system, with a new support-policy concept due by 1 August 2026 (Economx, 2026); and it legislated the dismantling of the KEKVA construction (Márton & Csurgó, 2026). Sector organizations have responded with detailed submissions on how the support system should be made transparent (Esély és Részvétel, 2026).

What does not yet exist is the framework itself. There is no cooperation strategy, no reconstituted consultative body and no published outcome of the financing review. The score reflects a settled and institutionally expressed policy commitment moving in a positive direction, not an operational framework; if the review does not produce one during the next assessment period, the score should fall rather than rise. Instead of focusing on establishing stable working relations with the civil sector, the new government is for now more interested in the dismantling of "His Royal Highness' Civil Sector" – the alternative civic space built and funded entirely by Fidesz to achieve goals of Fidesz.

Trend. Improving, on the strength of institutional signals and a formal review process rather than dependable structures.

Score 3 – Mostly enabling: Institutionally expressed commitment to cooperation (ministerial rank for the civil portfolio, a promised review of the entire financing system), but no delivered framework yet, score should fall to a 2 if that review yields nothing in the next assessment period.

D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Hungarian law does not tax advocacy or treat it as prohibited political activity. The Civil Act bars public benefit organizations from direct political activity, but the term is defined by reference to party activity and to nominating candidates, and does not extend to policy advocacy, campaigning or watchdog work. There is no lobbying registration barrier applicable to CSOs and no licensing requirement for campaigning.

Restriction operated instead through parallel channels. The Sovereignty Protection Office investigated precisely the organizations whose function is watchdogging, and the ÁSZ pursued Transparency International Hungary and Átlátszó, the country's two leading anti-corruption watchdogs (Gyori, 2024). Both instruments have now been withdrawn or defanged: the Office was abolished on 30 June 2026 (Human Rights Watch, 2026), and no new targeted audits have been reported. Watchdog output continued throughout the period notwithstanding the pressure;Átlátszó's investigation into private intelligence activity directed at political actors is itself evidence of an operative watchdog sector (Bodoky, 2026).

Two residual constraints qualify the assessment. Lex NGO's balance-sheet trigger still marks larger advocacy organizations for annual scrutiny

under a statutory label (organizations “capable of influencing public life”) designed to delegitimize them, and it has not been repealed. And the capacity to advocate remains conditioned by the resource asymmetries recorded under B3 and B4. Advocacy is free; it is not yet resourced or destigmatized in law.

Trend. Improving. The principal instruments of restriction were removed within the period while the stigmatizing statutory classification survives.

Score 3 – Mostly enabling: Advocacy and watchdog work are neither restricted, taxed nor reclassified in law, and the instruments used to harass watchdogs have been withdrawn, but Lex NGO’s stigmatising classification of organizations “capable of influencing public life” remains.

D5 – Government listens

> ***Standard.*** *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

The previous government’s record on this standard was the weakest in the cluster: consultation existed, but the Anti-Corruption Task Force experience — where an independent member’s positions were disregarded from the outset (Mora, 2024) — is the representative case rather than the exception. The statutory duty under Act CXXXI of 2010 to publish a summary of the opinions received and the reasons for their rejection was honored inconsistently and unenforceably.

Since April 2026, demonstrable responsiveness has replaced formal consultation. The heartbeat regulation case shows input producing a change in the government’s conduct within weeks: a joint letter from eighteen organizations resulted in a ministerial panel to which all signatories were invited (Iványi, 2026). The publication of the civil funding database likewise answered a long-standing sector demand

(Prime Minister's Office, 2026). Ministries respond to approaches, and CSO representatives across the interviews acknowledged this as a genuine change.

What is missing is the feedback loop in its methodological sense. No published account exists of how submissions influenced any final decision, the statutory summary obligation remains inconsistently applied, and there is no traceable record connecting input to outcome. The score therefore reflects a government that listens and responds without yet being able to demonstrate what it did with what it heard; a moderately favorable state moving in a positive direction, and one that will require institutionalization to be sustained beyond the goodwill of individual ministers.

Trend. Improving from a very low base, driven by political responsiveness rather than by any procedural guarantee of reasoned feedback.

Score 3 – Mostly enabling: Ministries now demonstrably act on CSO input, as the heartbeat regulation case shows, while the absence of any traceable record connecting submissions to outcomes means the standard is being met through responsiveness rather than through the reasoned feedback it actually requires.

Conclusion

Hungary at the close of the assessment period is best described as a hostile legal architecture inherited largely intact by a government that does not intend to use it. Every standard on which conduct alone is decisive — recognition, smearing, expression, responsiveness — improved sharply within the final quarter of the period. Every standard anchored in statute (the Lex NGO classification, the assembly restriction and its constitutional entrenchment, the absence of consultation guarantees and philanthropy incentives) is where it was in January 2026. The composite score of 2.7 sits

almost exactly on the boundary between “restrictive leaning” and “mostly enabling”, which is an accurate description of a country in transition rather than an artefact of averaging.

Three questions will determine the direction of the next cycle. (1.) Whether the government legislates: repeal of the assembly amendment and of Lex NGO, and transposition of the Anti-SLAPP Directive, would convert practice into protection. (2.) Whether the financing review produces a transparent, criteria-based allocation system rather than a redistribution once again based on political preferences and goals. And (3.) whether the new NVVH, whose powers over CSO mergers take effect in September 2026, is exercised proportionately. Until those are answered, the improvements recorded here rest on forbearance, and forbearance is revocable.

References

1 Bodoky, T. (2026, April 9). *Private intelligence service linked to minister Antal Rogán may have been spying at the Tisza Party.* Átlátszó. https://english.atlatszo.hu/2026/04/09/private-intelligence-service-linked-to-minister-antal-rogan-may-have-been-spying-at-the-tisza-party/

2 Bódis, A. (2024, January 22). *A Fidesz gigantikus álcivil hálózatot épített a választásokra – sok kis „Németh Szilárd” léphet akcióba.* VálaszOnline. https://www.valaszonline.hu/2024/01/22/fidesz-varosi-civil-alap-nemethszilard-valasztasok/

3 CIVICUS. (2026, June 26). *Hungary: “We expect the era of rights-stripping policies to end, in law and institutional practice.”* CIVICUS Lens. https://lens.civicus.org/interview/hungary-we-expect-the-era-of-rights-stripping-policies-to-end-in-law-and-institutional-practice/

4 Economx. (2026, July 3). *Át kell világítani a civilek finanszírozási rendszerét, a miniszter egy hónapot kapott.* https://www.economx.hu/magyar-gazdasag/2026/07/03/at-kell-vilagitani-a-civilek-finanszirozasi-rendszeret-a-miniszter-egy-honapot-kapott/

5 ECNL. (2025, May 15). *Alert: The Hungarian draft law on transparency of public life.* European Center for Not-for-Profit Law. https://ecnl.org/news/alert-hungarian-draft-law-transparency-public-life

6 Esély és Részvétel Közhasznú Egyesület. (2025, February 20). *A KSH jelentése a nonprofit szektor helyzetéről.* https://erke.hu/2025/02/20/a-ksh-jelentese-a-nonprofit-szektor-helyzeterol/

7 Esély és Részvétel Közhasznú Egyesület. (2026a, August 3). *A Nemzeti Vagyonvisszaszerzési és Vagyonvédelmi Hivatal létrehozása miatt változik a Civil törvény és a Civil nyilvántartási törvény.* https://erke.hu/2026/08/03/a-nemzeti-vagyonvisszaszerzesi-es-vagyonvedelmi-hivatal-letrehozasa-miatt-valtozik-a-civil-torveny-es-a-civil-nyilvantartasi-torveny/

8 Esély és Részvétel Közhasznú Egyesület. (2026b, August 19). *Vélemény a civil támogatások átláthatóságának biztosításáról.* https://erke.hu/2026/08/19/velemeny-a-civil-tamogatasok-atlathatosaganak-biztositasarol/

9 European Civic Forum. (2026). *Civic space report 2026.* Civic Space Watch. https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-European-Civic-Forum.pdf

10 Fazekas, P. (2025, March 18). *Füstfelhőbe burkolva szavazta meg a parlament a Stop, Pride-ot.* Szabad Európa. https://www.szabadeuropa.hu/a/pride_tilalom_orszaggyules_gyermekvedelmem_gyulekezesi_jog_fidesz/33351495.html

11 France 24. (2026, June 27). *Budapest Pride marchers push for equality after reversed ban.* https://www.france24.com/en/live-news/20260627-budapest-pride-to-push-for-equality-after-reversed-ban

12 Gerő, M., Fejős, A., Kerényi, Sz., & Szikra, D. (2023). From exclusion to co-optation: Political opportunity structures and civil society responses in de-democratising Hungary. *Politics and Governance, 11*(1). Cogitatio Press.

13 Gyori, B. (2024, June 25). *Hungary launches investigation into anti-corruption watchdogs.* Reuters. https://www.reuters.com/world/europe/hungary-launches-investigation-into-anti-corruption-watchdog-2024-06-25/

14 Human Rights Watch. (2026, July 2). *Hungary's Sovereignty Protection Office abolished.* https://www.hrw.org/news/2026/07/02/hungarys-sovereignty-protection-office-abolished

15 HVG. (2026, August 18). *Térképre tette a kormány az elmúlt négy év civil támogatásait.*

16 Iványi, A. (2026). *Párbeszéd a civil szervezetekkel a szívhangrendelet kapcsán.* Amnesty International Magyarország. https://www.amnesty.hu/wp-content/uploads/2026/07/szivhangrendelet_egyeztetes.pdf

17 Központi Statisztikai Hivatal. (2024). *Helyzetkép, 2023: Nonprofit szektor.* KSH.

18 Liberties. (2025, May 28). *Open letter on the Hungarian bill entitled "Transparency of Public Life".* https://www.liberties.eu/en/stories/open-letter-hungary-sovereignty/45438

19 Magyar, Á. (2026, June 12). *Átalakítja a közmédia működését a Tisza-kormány, benyújtották a törvényjavaslatot.* Euronews. https://hu.euronews.com/my-europe/2026/06/12/atalakitja-a-kozmedia-mukodeset-a-tisza-kormany-benyujtottak-a-torvenyjavaslatot

20 Magyarország Kormánya. (2026). *Megszűnik a szuverenitásvédelmi hivatal.* https://kormany.hu/hirek/megszunik-a-szuverenitasvedelmi-hivatal

21 Márton, B., & Csurgó, D. (2026, June 11). *Magyar Péterék a földbe tiporják a NER egyik kedvenc intézményét.* Telex. https://telex.hu/gazdasag/2026/06/11/kekva-magyar-peter-tisza-torvenyjavaslat

22 Miniszterelnökség. (2026). *Az elmúlt öt év civil támogatásai* [Interactive map]. https://atlathato.kormany.hu/

23 Mora, V. (2024). Hungary. In A. Narsee, G. Negri, K. Willamo & B. Goodwin (Eds.), *Civic space report 2024* (pp. 222–236). European Civic Forum.

24 Nonprofit.hu. (2026). *A Nemzeti Vagyonvisszaszerzési és Vagyonvédelmi Hivatal létrehozása miatt változik a civil törvény és a Civil nyilvántartási törvény.* https://www.nonprofit.hu/hirek/A-Nemzeti-Vagyonvisszaszerzesi-es-Vagyonvedelmi-Hivatal-letrehozasa-miatt-valtozik-a-civil-torveny-es-a-Civil-nyilvantartasi-torveny

25 Political Capital & Civilisation Coalition. (2025). *Civil szervezetek társadalmi megítélése.*

26 Portfolio. (2026, July 28). *Megszavazták a Nemzeti Vagyonvisszaszerzési és Vagyonvédelmi Hivatal felállítását.* https://www.portfolio.hu/gazdasag/20260728/megszavaztak-a-nemzeti-vagyonvisszaszerzesi-es-vagyonvedelmi-hivatal-felallitasat-852472

27 Presinszky, J. (2025, March 15). *Orbán Viktor poloskának nevezte a szerinte külföldről pénzelt bírókat, újságírókat, politikusokat és civileket.* Telex. https://telex.hu/belfold/2025/03/15/orban-viktor-marcius-15-beszed

28 Telex. (2026, August 18). *Térképre rakta a kormány, hol mennyi állami támogatást kaptak civil szervezetek az elmúlt öt évben.* https://telex.hu/belfold/2026/08/18/interkativ-terkep-allami-tamogatas-civil-szervezetek-telepulesek

29 Tisza Party. (2026, February 1). *A civilek napja – nélkülük nincs élhető ország.* https://magyartisza.hu/hirek/ujsag/a-civilek-napja-%E2%80%93-n%C3%A9lkuluk-nincs-elheto-orszag

30 V-Dem Institute. (2025). *Country graph: Hungary* [Dataset v16]. Varieties of Democracy Project. https://v-dem.net/data_analysis/CountryGraph/

31 Világgazdaság. (2026, August 19). *Civil pénzek: egyetlen térképen látható, hová és mikor jutottak az állami támogatások.* https://www.vg.hu/kozelet/2026/08/civil-szervezetek-allami-tamogatas-visszaeles-terkep

Legal sources

1 Act CXXXI of 2010 on public participation in the preparation of legislation [2010. évi CXXXI. törvény a jogszabályok előkészítésében való társadalmi részvételről].

2 Act CXII of 2011 on informational self-determination and freedom of information [2011. évi CXII. törvény].

3 Act CLXXV of 2011 on the right of association, public benefit status and the operation and support of civil society organizations [Civil törvény].

4 Act CLXXXI of 2011 on the court registration of civil society organizations [Civil nyilvántartási törvény].

5 Act LV of 2018 on the right of assembly, as amended on 18 March 2025 [2018. évi LV. törvény a gyülekezési jogról].

6 Act XLIX of 2021 on the transparency of civil society organizations capable of influencing public life [2021. évi XLIX. törvény]. https://njt.jog.gov.hu/jogszabaly/2021-49-00-00.1

7 Act XXXIV of 2026 on the National Asset Recovery and Asset Protection Office [2026. évi XXXIV. törvény a Nemzeti Vagyonvisszaszerzési és Vagyonvédelmi Hivatalról]. https://njt.jog.gov.hu/jogszabaly/2026-34-00-00

8 Directive (EU) 2024/1069 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (Anti-SLAPP Directive).

Interviews

Five semi-structured expert interviews conducted for this assessment:

- → Iványi Anna — EMMA Egyesület (EMMA Association)
- → Zsirka Hella — Háttér Társaság (Háttér Society)
- → Mester Zoltán — Emberség Alapítvány, Aspektus Csoport
- → Szeles András — Greenpeace Magyarország
- → Ligeti Miklós — Transparency International Magyarország

Civic Space Report 2025/2026

Slovakia

Country Score: **Mixed – Restrictive Leaning** Country Trend: ↘

2.35

Cluster A: 1.80
A1 Equal treatment: 2
A2 Political recognition as partners: 2
A3 Refrained authorities from smearing: 1
A4 No weaponization of state powers: 2
A5 Transparent and open public institutions: 2

Cluster B: 2.80
B1 Free establishment and operation: 3
B2 CSOs enjoy a safe space: 3
B3 Liberty of resourcing: 2
B4 Enabling fiscal environment: 3
B5 Free expression of criticism: 3

Cluster C: 2.80
C1 Citizens trust: 3
C2 Present in media: 2
C3 Free engagement: 3
C4 CSOs embedded in communities: 3
C5 Freedom of assembly: 3

Cluster D: 2.00
D1 Decision-making participation: 2
D2 Timely consultations: 2
D3 Policies for cooperation: 2
D4 Free advocacy: 3
D5 Government listens: 1

9. Civic Space Report – Slovakia

By Boris Strečanský

Introduction

Since late 2023, civic space in Slovakia has faced strong pressure from the 4th government of Robert Fico, which pursues populist economic policies, an anti-European, sovereignist foreign policy, and an illiberal, soft-authoritarian, and nationalistic-conservative domestic policy that explicitly targets and vilifies critical civil society, independent media, and political opposition.

The period of January 2025 – June 2026 marks the continuation of high contestation and confrontation on the domestic turf, continued process of state capture by a narrow circle of party cronies and oligarchs, take-over of institutions serving narrow party agendas, and emotionally charged and antagonistic public discourse that raises polarization and broader societal mistrust. The government's rhetorics and politics have been discrediting the liberal-democratic regime, shifting toward an Orban-type electoral democracy. Power is being concentrated in clientelist, clan-like networks taking over the control of many institutions, while the remaining independent institutions keep resisting attempts to capture them. Participatory and deliberative democracy is being hollowed out. The European Commission concluded in 2026 that the civil-society environment continued to face pressure, while CIVICUS rated Slovakia's civic space as "narrowed" (Civicus Monitor, 2026; European Commission, 2026).

Cluster A – Institutional and Political Environment and Narratives

A1 – Equal treatment

Standard. *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

The freedom of association and general CSO legal framework are not discriminatory. There is a constitutional guarantee of equal treatment. However, Act 109/2025, commonly referred to as the "Russian law" which was adopted in 2025, had serious implications for CSOs' access to resources, as it introduced extensive new administrative and reporting obligations and impacted their access to resources. These burdens arose not only from amendments to the legislation governing non-profit organizations, but also from the simultaneous amendment of the **Freedom of Information Act,** which extended information-disclosure obligations to certain CSOs receiving public funds but not equivalently on other private entities receiving public resources. (Batková & Čuroš, 2025; European Commission, 2025). The Council of Europe Expert Council on NGO Law and the Venice Commission questioned the regime's proportionality and non-discriminatory character. The Constitutional Court subsequently invalidated the Act so the legal framework is the same as before 2025 (ÚS SR, 2025).

In practice, registration remains broadly open, but treatment affecting CSOs' activities is selective. Authorities use a selective approach to target CSOs for a cross-agency audit and inspection regime (See A4 for more detail).

Human-rights, environmental, LGBTI+ and many cultural CSOs were disadvantaged in public subsidy schemes by administrative decisions. Coalition political parties have openly called for defunding of LGBTI+ projects. (ta3, 2025; Strečanský et al., 2026a). Critical and rights-based CSOs faced a higher risk of exclusion, reputational pressure, and administrative burden than less politically exposed organizations (Hallon, 2026b).

Trend. The trend is deteriorating overall (Day et al., 2026). The Constitutional Court judgment and removal of the Code provision demonstrate functioning checks, but they do not reverse a broader movement toward differentiated treatment according to CSO profile, activity and perceived political loyalty.

Score 2: Formal equality is maintained, but practical treatment shows high levels of selectiveness.

A2 – Political recognition as partners

> ***Standard.*** *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

The institutional framework governing the formal relationship between government and civil society has remained unchanged. The Government Council for NGOs with its Chamber of NGOs, the Office of the Plenipotentiary for Civil Society, the Civil Society Development Concept for 2022-2030 and the 2023–2027 government Manifesto affirm cooperation (ÚSVROS, 2022; Vláda SR, 2023).

In practice, political recognition of independent CSOs has deteriorated sharply. The adversarial positioning is explicit in public statements of high government officials, including the prime minister or the Plenipotentiary of the Government for Civil Society (JOJ24, 2025; TASR, 2026).

Neither the Chamber of Non-Governmental Non-Profit Organizations nor other representatives of civil society were consulted or invited to participate in the drafting of the "Russian law" – major piece of legislation that changed the conditions for CSOs. The Government Council for Non-Governmental Non-Profit Organizations has repeatedly adopted resolutions calling on the government and members of parliament to discuss the regulation of civil society and to reject harmful legislation aimed at defamatory labeling of civil society organizations or the imposition of unreasonable administrative obligations and sanctions, including the dissolution or disbandment of an organization, but these were ignored. (Vagač et al., 2025).

The partnership principle has never been fully implemented, but since the current government took office, its practice has deteriorated significantly. CSOs increasingly approach government relations defensively and depend on individual ministries, officials, and remaining advisory structures rather than a predictable partnership framework.

Trend. The trend is strongly deteriorating.

Score 2: The dominant posture of the government is threatening independent and critical CSOs and pursues their delegitimization by all available means – legally, sub-legally by administrative measures, by stigmatizing narrative, and by dismantling the partnership principle in practical terms.

A3 – Refrained authorities from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

No law authorizes government representatives to stigmatize CSOs, while constitutional protections of dignity, reputation, association and expression remain applicable.

The standard was repeatedly violated at a high political level. In January 2025, the Prime Minister, Interior Minister, and senior security officials associated NGOs, protest organizers, and activists with an alleged coup plotted with the Georgian Legion. These were fabricated accusations used to deflect attention from failures in fiscal consolidation. CSOs, independent media, and critical citizens are systematically portrayed as 'foreign mercenaries' and enemies of Slovakia. The pattern continued after the Constitutional Court ruling, with politically active NGOs described as a danger.

Any critique of government policy has become a pretext for personalized vilification — of journalists, NGOs, and ordinary citizens alike. Representatives of ruling political parties and government institutions not rarely portray non-governmental non-profit organizations as an internal enemy and justify the adoption of stricter laws on the grounds that the state must protect itself from pests – ergo non-governmental non-profit organizations that express their views on public issues and engage in public debate. (Gedra, 2025a; Úrad vlády SR, 2025).

The stigmatization operates through rhetorical tools. (Blaščák, 2025; Gedra, 2025a, 2025b; Gluck, 2025; Úrad vlády SR, 2025) which fall on a prepared ground. 35% of Slovaks viewed CSOs as "foreign agents" (2024 wave), evidence for the reach of this rhetoric (Kaňuchová, 2025).

The ruling party SMER-SD has sponsored the majority of hate and attack advertising against journalists and non-governmental organizations in 2025 on the Slovak social media market. (ICJK, 2025).

The material effects of this practice translate into delegitimization, self-censorship, a chilling effect, and ongoing polarization (Kosnáč et al., 2025; Lindberg, 2025).

Trend. The trend is deteriorating and increasingly normalized.

Score 1: Clearly hostile attitude becomes a central feature of the political environment.

A4 – No weaponization of state powers and good governance principles

> ***Standard.*** *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, emergency measures, or principles such as transparency and fiscal due diligence — selectively or disproportionately to pressure CSOs because of their activities or views.*

Audits, tax controls, labor and workplace safety inspections, data protection and financial audits are legitimate measures when implemented neutrally, based on objective risk, proportionality, and equal treatment.

In practice, authorities have taken these measures against select CSOs, especially in 2026, following the government's failed attempt to adopt the "Russian Law". The PM proposed new state oversight regime of NGOs extending beyond finances to labor law, occupational health and safety, and data protection (TASR, 2026; Úrad vlády SR, 2026). Since then, during 2026, sweeping audits have targeted CSOs handling public funds deemed "malevolent". They were examining compliance with workplace safety, data protection, and public funds handling. The Ministry of Finance's audit unit conducted financial audits across numerous organizations.

Since 2025, there have also been criminal investigations on trumped-up charges against several CSOs due to election interference and financial fraud. (TASR, 2026; Úrad vlády SR, 2026; Vláda SR, 2026). Numerous representatives of CSOs have also been summoned for police interrogation. In 2025, government officials held press conferences in which they publicly defamed individuals associated with civil society organizations in various fields for allegedly unlawful actions (Strečanský, 2025a). During the same period, authorities attempted to seize the Whistleblower Protection Office (the Court suspended this effort in December 2025).

This practice caused administrative obstruction, financial and material stress on organizations and individuals, financial destabilization, and defamation (Vagač et al., 2025). Resources had to be diverted to legal defense, and some CSOs disengaged from public funds to avoid harassing audits.

Trend. The trend is sharply deteriorating.

Score 2: Otherwise lawful supervisory powers are increasingly embedded in a political strategy of pressure against contested parts of civil society

A5 – Transparent and open public institutions

Standard. *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

Slovakia retains a developed freedom of information regime (base on Act 211/2000, the Aarhus Convention, and the ICCPR), publication requirements, and formal legislative transparency mechanisms. These provide a substantial legal basis for watchdog work. The 2024/2025 FOI amendment (Act 401/2024) introduced fees for "exceptionally extensive"

searches and extended response times from 8 to 12 days (European Commission, 2025). The Constitutional Court later declared these clauses for unconstitutional in 2025.

The central problem is the gap between formal openness and decision-making practice. Fast-track procedures, parliamentary proposals bypassing ordinary consultation, and major late amendments reduce the information available before decisions are made (European Commission, 2025) (See D2).

Watchdog organizations retain access to many formal tools, but their ability to scrutinize policy before adoption is weakened. This reduces accountability and evidence-based debate and shifts civic action toward post-adoption litigation or public mobilization.

Trend. Deteriorating, mainly through process and institutional practice rather than legal deterioration. Courts partly offset the administrative decisions.

Score 2: The formal infrastructure remains operational, but the decision-making tends to avoid public scrutiny.

Cluster B – Legal and Financial Framework for CSOs

B1 – Free establishment and operation

Standard. *Everyone can freely establish, join, or participate in a CSO; CSOs determine their own objectives; registration is clear, simple, quick, and inexpensive. The state does not interfere in internal governance, and monitoring or reporting is defined by law, proportionate and not onerous*

Freedom of association remains constitutionally protected, and Slovakia continues to provide several established legal forms (associations, foundations, non-investment funds, non-profit organizations) with a unified register (Act 346/2018). Registration has not become generally prohibitive, and the number of registered organizations remains large. Slovakia has around 30,000 active CSOs, although over 80,000 are formally registered; many are dormant or inactive. The number of CSOs has constantly been rising since the early nineties through 2000s, and this trend continued (Štatistický úrad SR, 2025). Formation is comparatively easy.

The new obligations in the "Russian Law" adopted in 2025 added reporting, donor-disclosure, freedom-of-information and supervisory obligations which were described as administratively absurd and operationally devastating, hitting small, community-focused CSOs hardest — the organizations least able to absorb compliance costs (Via Iuris, 2026). Sector actors devoted staff time and external expertise to compliance,

while intermediaries modified fundraising systems to supply required data (Donio, Darujme.sk). The Constitutional Court later struck down the regime.

The burden fell especially on smaller organizations with limited compliance capacity. Resources shifted from mission delivery to administration, legal interpretation, and risk management, while the threat of sanctions increased the perceived cost of operating publicly.

Trend. The trend is seen as deteriorating due to 2026 administrative pressures on CSOs operations.

Score 3: Establishment remains free; the principal deficit concerns operational autonomy and proportionality of oversight.

B2 – CSOs enjoy a safe space and protection from arbitrariness

> ***Standard.*** *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

Strong constitutional and judicial safeguards remain in place. Dissolution and sanctions require legal grounds and are subject to independent judicial review. There was no documented general pattern of arbitrary dissolution or suspension of a CSO during the period, and access to constitutional review proved effective. However, its protective role has now been openly contested. The Prime Minister stated the Court "would no longer be able to protect NGOs" (TASR, 2026). The February 2026 cross-agency inspection regime means the Constitutional Court judgment should not be interpreted as restoring an enabling environment, but that other ways of narrowing it are pursued by administrative means.

Trend. The trend is deteriorating, but the judiciary's resilience moderates it.

Score 3: Judicial review remains meaningful and provides protection. However, administrative measures taken by the executive limit the enabling environment.

B3 – Liberty of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

Slovakia has not lost or impaired its legal opportunity to solicit resources from various sources domesticall or abroad. Fundraising from abroad has not been legally restricted or impaired.

Raising funds for some CSOs from public sources (government funds, ministries) has become more complicated for politically motivated decisions. There were funding delays and cancellations of calls for proposals in the fields of human rights (Ministry of Justice), culture (Ministry of Culture), and environment (Ministry of Environment). Some calls were adjusted so that CSOs were removed as eligible applicants (in the Envirofond and Green Education Fund) (TASR, 2024). Some funding schemes, such as the Art Council, were recalibrated and their priorities were reframed to make some originally eligible CSO recipients ineligible (Strečanský, 2025a). Based on analyses of human rights, culture, the environment, and development aid, the total defunding of non-governmental organizations from public funds in 2024 and 2025 can be estimated at EUR 15–16 million. Defunding has produced staff reductions, program disruptions, loss of institutional capacity, and chilling effects (Strečanský et al., 2026b).

In May 2025, the National Council of the Slovak Republic approved an amendment to the Act on Non-Profit Organizations (called by civil society the "Russian Law"), which entered into force in June 2025. The law affected the environment for private donations by requiring NGOs to disclose donors' names under the pretext of increasing transparency. This requirement would undermine NGOs' ability to raise funds from private donors who prefer anonymity. The new legislation also required qualified NGOs to submit a so-called "Report" to the Ministry of Finance. In this report, they were supposed to include the personal data (name and surname) of persons who made a financial contribution or received a loan exceeding EUR 5,000 in a calendar year, unless the contribution was used to support healthcare costs for a specific person. The Constitutional Court's suspension of the law at the end of 2025 rendered these new policies void.

CSOs struggle to diversify their income through tax designation, corporate support, online fundraising mechanisms and international funding, but smaller organizations have a weaker fundraising capacity. Still, through platforms (Donio.sk, Darume.sk, Startlab.sk) many were able to solicit support from private individuals for their causes. This is estimated at 15-20 million EUR annually (Brozmanová Gregorová & Murray Svidroňová, 2025). No disproportionate AML/CFT regime specifically targeting CSOs was identified during the period.

Trend. The trend is deteriorating despite private sector engagement and grassroots resilience.

Score 2: Resourcing remains possible, but there are profound systemic problems in access to some (not all) public funding.

B4 – Enabling fiscal environment

Standard. *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures and sanctions regimes are applied to CSOs proportionately and on a risk basis.*

The tax treatment of CSOs and philanthropy has been comparatively favorable and stable — among the strongest features of the environment. Slovakia's key fiscal support mechanism – the tax designation system – survived the assessed period and generates over €100 mil annually (ifp, 2024). Proposals to abolish corporate tax designation did not become law and corporations may designate 1% or 2% of their corporate income tax to non-profit organizations. Individuals may also continue assigning a share of 2% income tax to eligible non-profit recipients, with enhanced designation plus extra 1% linked to volunteering certified by an organization receiving the help.

Non-business public-benefit entities also received an exemption from the financial transaction tax. This applied to civic associations, foundations, non-investment funds, non-profit organizations providing generally beneficial services, special facilities of churches and religious societies, interest groups of legal entities, research and development entities, organizations with an international element, and the Slovak Red Cross. (Lukačovič, 2024) To obtain an exemption, non-governmental organizations had to submit an application through their bank.

The adverse effects during the period came more from general fiscal pressure and politicized funding decisions than from the dismantling of the fiscal-support architecture itself. Private giving via platforms (Donio, Darujme, Ľudia ľuďom) has grown steadily.

Trend. The trend is broadly stable, with economic pressure rather than structural fiscal dismantling.

Score 3: The invalidation of the "Russian law" and the continuation of the existing tax designation law provide for a mostly enabling environment.

B5 – Free expression of criticism

> ***Standard.*** *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

Article 26 of the Constitution, Article 10 ECHR and EU fundamental-rights protections provide a strong formal basis for freedom of expression; censorship is prohibited, and journalist-source and whistleblower protections exist.

The main deterioration is indirect legal and political intimidation rather than general censorship. Amnesty International documented harassment and pressure against human-rights defenders, while the European Commission recorded three reported SLAPP cases in 2025 and numerous verbal and legal threats against journalists in 2025–2026 (Amnesty International, 2026; European Commission, 2026). The Minister of Culture filed criminal complaints against the organizers of a public call for her resignation and against writer and cultural activist Michal Hvorecký over a critical commentary. She also sued the former director of the Slovak National Theater for defamation, seeking 50,000 euros in damages. The criminal charges were dismissed (SME.sk, 2025), and the defamation charges are still ongoing. Initiating these legal measures can create a chilling effect, increase legal and financial risks for critics, and encourage self-censorship among journalists, activists, and other civic actors (Vagač et al., 2025).

The current Slovak government's actions not only jeopardize the country's media landscape but also pose a significant challenge to EU-wide efforts to protect media freedom and democracy, particularly in light of the newly adopted European Media Freedom Act (ECPMF, 2025). Changes affecting whistleblower protection and public-interest scrutiny increased uncertainty.

The June 2026 adoption of legislation transposing the EU Anti-SLAPP Directive has only partially improved the situation due to its focus on cross-border cases mainly (European Commission, 2026). Politically exposed critics devote growing resources to legal review, security and crisis communication, and some face incentives to reduce visibility or self-censor. Some actors reduce visibility or avoid politically sensitive engagement because criticism can trigger reputational or administrative retaliation.

Trend. The deteriorating trend is driven primarily by intimidation and legal/political uncertainty rather than direct censorship.

Score 3: Critical expression remains active and legally protected, but the costs and risks of exercising it have increased materially.

Cluster C – Public Engagement and Perceptions towards the Work of CSOs

C1 – Citizens' trust

Standard. *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

The most recent comparable survey evidence available for this assessment shows that public trust in CSOs is limited and strongly differentiated by organizational type, while overall there is a slim uptake in trust in CSOs. The generic "NGO/CSO" label appears to carry less trust than charitable or humanitarian activity. In 2025 38% trusted CSOs (Focus agency for Slovak Academy of Sciences, April 2025), compared with 2024, when 37% of respondents said they trusted CSOs in general, and with 35.8% in 2023 (Gloss et al., 2025). Trust is considerably higher for charitable and humanitarian CSOs. In 2025 it was at 60.7% (Gloss et al., 2026) compared to 50.6% in 2023.

In 2024 36% trusted organizations focused on civic activism and changing attitudes in society (Gloss et al., 2025) and 53.2% trusted environmental organizations in 2025 (Gloss et al., 2026).

Crucially, the institutions attacking CSOs are themselves among the less trusted — government trust reached 35.9% in 2025, up from 30% in 2024 and parliament sits at 36.1% in 2025 (Gloss et al., 2026) compared to 25.8% in 2024 (Gloss et al., 2025).

During January 2025–June 2026, CSOs operated in an increasingly polarized information environment in which senior political actors repeatedly portrayed critical, advocacy-oriented and foreign-funded organizations as politically motivated, foreign-controlled or destabilizing. Such narratives increase the risk of further erosion of generalized trust and reinforce the divide between organizations perceived as charitable and those associated with advocacy or public-policy change. A committed, mobilizable constituency actively defends civic actors, but a large distrusting bloc — reinforced by state smear campaigns — prevents broad legitimacy.

Trend. The trend is stable but sharply polarized and under significant negative pressure;

Score 3: Trust is polarised.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

Slovakia retains independent private, digital, and print media and formal constitutional guarantees of media freedom and pluralism. However, the public media (STVR) governance regime was reconstructed politically, and editorial independence has been violated.

The public broadcaster's capture was completed in 2025 by the abolition of Radio and Television Slovakia (RTVS) and the creation of new entity - STVR (Slovak Television and Radio) with coalition-only Board, a politically appointed Director General. The result was editorial purges and pro-government drift (IPI/MJRC, 2025). Slovakia fell to 38th on the RSF Index (its lowest in 15 years); politicians branded journalists "parasites"/"foreign agents" and ran 523 defamatory ads (ICJK/MEMO98, 2025). Independent

private outlets (Denník N, SME, Aktuality) remain robust and cover CSOs fairly. Private broadcasters also experienced political and commercial pressure. Government officials themselves became important transmitters of narratives depicting critical media and CSOs as political, foreign-controlled, or hostile (RSF, 2026).

CSOs face systemic bias in captured/state media and rely more on social and local channels — raising costs and harassment exposure. Independent outlets continue to provide space to CSOs and are themselves part of civic resilience. However, fewer impartial or broadly trusted channels make it harder for CSOs to reach audiences beyond already sympathetic constituencies.

Trend. The trend is worsening as disinformation media and related influencers exert influence, erode cognitive space, and demonize CSOs.

Score 2: Important independent outlets remain active and accessible, but the environment is materially less pluralistic and secure.

C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.*

Volunteering, giving, civic activism, public campaigning and protest participation remain legal. There is no general legal prohibition on citizens supporting or joining CSOs. Actual civic engagement demonstrates considerable vitality.

Large decentralized protests mobilized tens of thousands in Bratislava, Košice and more than 40 towns (Civicus Monitor, 2025). Demonstrations against justice reforms, the Kremlin-leaning foreign policy line, and the April 2025 NGO bill, often coordinated by civic coalitions (SITA, 2025), became the largest since 2018, with strong student, cultural, and regional

participation. Protest organizers were accused by senior government and security officials, without substantiated evidence, of involvement in preparations for a violent coup, while activists involved in regional protest mobilization reported threats and alleged surveillance. Politically exposed CSOs faced vilification and increasing online harassment (Ballová, 2025; Strečanský, 2025a; Vagač et al., 2025; Zigová, 2025).

Domestic crowdfunding and individual giving grew (Darujme.sk, 2026; Zaťko, 2026). Organized volunteering remained steady, with modest institutional momentum. The reputational risk of being associated with targeted organizations can discourage participation even where no formal prohibition exists.

Trend. The trend is stable. Penalization of protest organizers through trumped-up accusations did not discourage participation.

Score 3: Giving and volunteering are stable or rising. The social acceptance of protests is not deteriorating.

C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and can mobilize grassroots support, public solidarity, and cross-sector backing in defense of civic space.*

Slovakia shows evidence of civic embeddedness in communities. Around 30,000+ active CSOs operate in nearly all municipalities, and outside the main cities the sector is dominated by small, volunteer-based associations—sports clubs, folk and cultural groups, fire brigades, and community initiatives—giving it a dense local constituency (Strečanský, 2025b). CSOs operate nationwide, including numerous local volunteer associations, cultural groups, and community organizations. Platform for Democracy links more than 90 organizations, coordinates legislative monitoring and regional activity, and communicates beyond its

membership (Janočko, 2025). Cross-sector initiatives connect NGOs with municipalities, media, experts, businesses, and educational actors. This depth materially limits the state's capacity to isolate civil society and provides alternative resources when institutional channels close. Hostile conditions have also strengthened sectoral solidarity, joint legal work, fundraising, and mutual support, although these resilience strategies rely heavily on volunteer energy and informal networks. Increasing support through crowdfunding reflects connections among civil society organizations, local initiatives, and the broader civil public. (Brozmanová Gregorová & Murray Svidroňová, 2025)

Trend. The trend is stable, slightly strengthening, although uneven geographically and sectorally and constrained by burnout and weak resources.

Score 3: Dense networks help absorb shocks, sustain counter-narratives and mobilize public solidarity under pressure, but broad societal polarization is present in communities as well.

C5 – Freedom of assembly

> ***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

Freedom of peaceful assembly remains constitutionally protected and is governed principally by a notification-based system under Act 84/1990. No cases have been recorded where a notified assembly was prohibited, restricted, or otherwise limited. Any natural or legal person, including civil organizations, can organize an assembly.

In practice, major protests and Pride events continued, and police generally cooperated with organizers. Some formal deterioration came from the post-assassination attempt on the Prime Minister in 2024 through

the ‘Lex Assassination’, which introduced assembly restrictions around residences and state institutions and increased sanctions. More significant politically were January 2025 allegations that anti-government protest organizers were preparing a violent coup. The security framing delegitimized protest and raised perceived risks for organizers and participants, but it did not produce a systematic pattern of bans or violent dispersal (Batková, 2025).

Trend. The trend is deteriorating moderately because formal restrictions expanded and hostile security framing emerged.

Score 3: Large peaceful assemblies continued throughout the period and, the practical ability to assemble remained substantial.

Cluster D – CSOs as Policy Makers

D1 – Right to participate in decision-making including in the policy cycle

Standard. *Everyone has the right to participate in decision-making, and authorities use mechanisms ensuring meaningful public and CSO participation, with redress for non-compliance, across the whole policy cycle and without discrimination.*

Slovakia retains comparatively developed formal mechanisms: public consultation through the legislative process, advisory bodies, Government councils, CSO representation in the Government Council for Non-Governmental Non-Profit Organizations.

The problem is in implementation. There is an increasingly systematic circumvention of these mechanisms through legislative initiatives submitted outside standard consultative frameworks, shortened procedures and last-minute parliamentary amendments. (Vagač et al., 2025). Participation therefore often exists institutionally while losing influence over actual policy decisions. A growing number of cases showed the government taking a tokenistic approach to policy consultation, soliciting input from more politically convenient interlocutors while retaining the formal architecture of plural participation (Lizák, 2026). A CSO survey recorded a strong perception of deteriorating opportunities to participate and of the state's willingness to consult.

As many as 96.3% of organizations in a CSO survey perceive a deterioration in legislative conditions, with similarly negative assessments regarding participation in decision-making and the state's willingness to consult with the civil sector on policies. These factors contribute to a sense of threat and weakening of the position of non-governmental organizations in society (Gallo Kriglerová, 2025). CSOs increasingly shift from routine policy partnership toward external advocacy, protest, litigation and public campaigning. Some sector-specific bodies continue to function, including mechanisms for civil society representation in EU-funded structures, so participation has not disappeared uniformly.

Trend. Deteriorating, particularly at the central-government level.

Score 2: formal participatory infrastructure still in place, but its practical effectiveness has been significantly hollowed out.

D2 – Timely consultations and equal participation

Standard. *Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible, so that grassroots and under-resourced CSOs are not excluded due to limited means.*

Standard legislative procedures provide for public consultation, access to draft legislation and comment mechanisms. Consultation rules require notice and adequate time.

The problem is in implementation. Domestically, the executive has successfully marginalized the legislative branch through the continued and unjustified use of fast-track procedures, preventing meaningful public consultation and expert involvement and leading to legal chaos and a profound loss of legal certainty. Around one-fifth of legislation adopted in 2025 used fast-track procedures. (Day et al., 2026). Counterexamples include expert roundtables on lobbying involving NGOs. CSOs may formally submit views but frequently lack the time, information, or procedural moment needed to influence substantive choices. Consultation becomes procedural rather than genuinely deliberative (Vagač et al., 2025).

Trend. The trend is deteriorating, with exceptional and parliamentary procedures increasingly functioning as mechanisms for bypassing participation.

Score 2: Consultation has not ceased altogether, but timeliness, equality and practical influence are significantly compromised.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

Slovakia formally possesses the institutions contemplated by the standard: the Government Council for NGOs, the Office of the Plenipotentiary, and the Civil Society Development Concept 2022–2030, and Slovakia's membership in the OGP.

Their formal existence increasingly contrasts with government policy. Much of the Civil Society Development Concept has been sidelined,

and implementation of many remaining measures is invisible or remains on paper (Vagač et al., 2025). Cooperation between ministries and civil organizations occurs on an ad hoc basis, depending on the topic, the bureaucratic setup, and the minister's role (Batková, 2025). Most importantly, the Office of the Plenipotentiary, designed to facilitate cooperation, was described as largely inactive in that role and instead publicly supported tighter NGO regulation and drew inspiration from Hungary (Hallon, 2026a; Platforma pre demokraciu, 2025; Zajac, 2025). The Government Council and CSO Chamber continue to function, preserving some institutional dialogue, but they no longer demonstrate that cooperation is a settled whole-of-government policy commitment.

Trend. Strongly deteriorating trend from a previously established partnership architecture toward contestation and control.

Score 2: The issue is not the absence of institutions but a substantive inversion of their intended enabling function

D4 – Free advocacy and watchdogging

Standard. *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Advocacy, campaigning, policy criticism and watchdog activities remain lawful; Slovakia has not enacted a general prohibition on 'political activity' by CSOs. However, the legitimacy of such activity became a central political target because top government officials frequently accused CSOs engaged in watchdogging, advocacy, and public policy debate of being "political NGOs".

An early 2025 proposal sought to classify NGO advocacy and media campaigning as lobbying while leaving major commercial lobbying

actors outside the same regime (JOJ24, 2025). Civil-society organizations successfully challenged this selective and non-participatory approach (Kimijan, 2025; PDCO, 2026).

Despite this pressure, organizations continued successful watchdogging, litigation, campaigns, and legislative monitoring, including mobilization against the "Russian Law" (Act 109/2025) and advocacy contributing to constitutional review. CSOs have been following the adoption process of the law on lobbying, which remains in the legislative process.

Trend. Deteriorating.

Score 3: advocacy remains practically vigorous and has not yet been legally reclassified as prohibited activity.

D5 – Government listens

> ***Standard.*** *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

Formal consultation procedures and advisory structures theoretically provide a feedback loop between citizens, CSOs and public authorities.

The assessed period contains repeated examples of formal participation without genuine consideration. The Government Council's opposition to the restrictive amendment to NGO law (Russian Law) did not prevent its adoption; major provisions were rewritten immediately before parliamentary consideration, making meaningful feedback structurally impossible.

Civil society's extensive objections were ultimately vindicated by the Constitutional Court rather than incorporated through political decision-

making. After the judgment, the executive responded with a broad alternative inspection regime rather than reconsidering the underlying policy approach.

The government is increasingly made to listen through courts, public pressure, media, and mobilization rather than through authorities incorporating CSO input. An open letter co-signed by 500+ organizations setting red lines on transparency and fair grant rules went unanswered (Hallon, 2025).

Trend. Strongly deteriorating.

Score 1: Formal channels remain, but central-government responsiveness to independent civil-society input is severely lacking.

Conclusion

In the period of January 2025 – June 2026 core freedoms of association, expression, assembly, and participation remain legally protected, and judicial review, including the interventions of the Constitutional Court in protecting democratic principles and fundamental freedoms, continued to provide meaningful safeguards. The assessment shows the gap between the continued existence of formal institutions, rules and standard legal frameworks on one hand and the deterioration of their practical enabling function on the other, which is the salient characteristic of this period. The central pattern is a widening gap between formal guarantees and the implementation practice.

In the reviewed period, a clearly hostile government attitude toward civil society became a central feature of the political environment. The assessment reports the weaponization of state powers and good governance principles against segments of civil society that are independent and maintain an autonomous posture toward the government. As a result, politically exposed and rights-based CSOs face

higher administrative, reputational, and financial costs, while consultation mechanisms are increasingly bypassed or rendered ineffective. Civic space has endured ongoing and growing pressure from blanket legislative efforts (such as the "Russian" Law) aimed at subduing critical voices by imposing stricter rules across the sector under the guise of increased transparency. Civic space also had to withstand selective targeting, selective defunding, administrative auditing, and ongoing public defamation and vilification of targeted individuals and organizations.

Despite the overall deteriorating trend, growing pressure on civic space has also generated countervailing dynamics. Cross-sector cooperation has intensified, linking CSOs with municipalities, independent media, experts, businesses, educational institutions and informal initiatives. The depth of these networks limits the state's capacity to isolate civil society and provides alternative channels of support when institutional avenues narrow or close. Hostile conditions have also strengthened sectoral solidarity, joint legal and advocacy work, fundraising and mutual support. At the same time, this resilience should not be overstated: it remains uneven and is thinly resourced. It often depends on volunteer energy, informal networks and crisis-driven mobilization rather than stable institutional resources. Nevertheless, dense civic networks help absorb shocks, sustain counter-narratives and mobilize public solidarity, providing an important source of resilience under continuing political and institutional pressure.

References

1 Ballová, M. (2025, February 28). Dôvody na protesty stále nepominuli, odkazujú tisícky ľudí, zhromaždených v Banskej Bystrici. *My Bystrica*. https://mybystrica.sme.sk/c/23457025/dovody-na-protesty-stale-nepominuli-odkazuju-tisicky-ludi-zhromazdenych-v-banskej-bystrici.html

2 Batková, K. (2025). Regulatory Framework for CSOs in Slovakia—Assessment According to Methodology. In *Civil Society in Slovakia and Its Resilience. 2025 Report*. Malý Berlín.

3 Batková, K., & Čuroš, P. (2025). *Analýza zákona o neziskových organizáciach*. Via Iuris. https://viaiuris.sk/wp-content/uploads/2025/04/Analyza-zakon-o-MNO-VIAIURIS.pdf

4 Blaščák, F. (2025, February 27). Fico útočí na občiansku spoločnosť (píše Fedor Blaščák). *SME*. https://komentare.sme.sk/c/23456231/fico-utoci-na-obciansku-spolocnost-pise-fedor-blascak.html

5 Brozmanová Gregorová, A., & Murray Svidroňová, M. (2025). *Správa o filantropii na Slovensku 2023*. Centrum pre filantropiu n.o. & Nadácia Tipsport. https://cpf.sk/wp-content/uploads/2025/03/FINAL-Sprava-o-filantropii-2023-pub-25.pdf

6 Civicus Monitor. (2025). *Large and sustained protests against government's pro-Russian stance and Foreign Agent Law*. Civicus. https://monitor.civicus.org/explore/large-and-sustained-protests-against-governments-pro-russian-stance-and-foreign-agent-law/?utm_source=chatgpt.com

7 Civicus Monitor. (2026). *Https://monitor.civicus.org/country/slovakia/*. Civicus Monitor. https://monitor.civicus.org/country/slovakia/

8 Darujme.sk. (2026, June 10). *Ľudia šetria, ale Slováci neprestávajú pomáhať.* https://www.darujme.sk/blog/napriek-krize-darcovstvo-rastie/

9 Day, J., McCourt, K., Leneghan, N., Molnar, N., Radchenko, O., & Toth, V. (2026). *Liberties Rule of Law Report*. Civil Liberties Union for Europe.

10 ECPMF. (2025, February 20). Slovakia: New report highlights growing media freedom crisis. *European Centre for Press and Media Freedom*. https://www.ecpmf.eu/slovakia-new-report-highlights-growing-media-freedom-crisis/

11 European Commission. (2025). *2025 Rule of Law Report. Country Chapter of the rule of law in Slovakia*. European Commission. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025SC0925

12 European Commission. (2026). *2026 Rule of Law Report. Country Chapter on the rule of law situation in Slovakia.* [2026 Rule of Law Report. The rule of law situation in the European Union]. European Commission. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52026SC0925

13 Gallo Kriglerová, E. (2025). Resilience of Non-Governmental Non-Profit Organizations. In *Civil Society in Slovakia and Its Resilience. 2025 Report*. Malý Berlín.

14 Gedra, J. (Director). (2025a, March 30). *Upratať politické mimovládky bol náš predvolebný sľub a hodláme ho dodržať* [Video recording]. https://www.facebook.com/JurajGedra.SK/videos/2294391810961978?locale=sk_SK

15 Gedra, J. (Director). (2025b, April 4). *Mimovládky sa boja transparentnosti ako čert kríža a je nepochopiteľné, že ich médiá chránia* [Video recording]. https://www.facebook.com/JurajGedra.SK/videos/688909250336734?locale=sk_SK

16 Gloss, H., Cigáneková, V., & Kosnáč, P. (2026). *Trendy (ne)dôvery 2026*. DEKK Inštitút. https://www.dekk.institute/wp-content/uploads/2026/05/DEKK-trendy-nedovery-2026-SK.pdf

17 Gloss, H., Kosnáč, P., & Cigáneková, V. (2025). *Trendy nedôvery 2025*. DEKK Inštitút. https://www.dekk.institute/wp-content/uploads/2025/06/dekk-report-trendy-nedovery-2025-rev2.pdf

18 Gluck, R. (Director). (2025, April 4). *Opozícia a ich spriaznené mimovláky sa boja transparentnosti ako čert kríža* [Video recording]. https://www.facebook.com/GluckRichard/videos/2908321879346285?locale=sk_SK

19 Hallon, T. (2025, January 29). Otvorený list občianskeho sektora vláde SR. *Platforma pre demokraciu*. https://www.predemokraciu.sk/2025/01/29/otvoreny-list-obcianskeho-sektora-vlade-sr/

20 Hallon, T. (2026a, February 9). 120 osobností občianskeho sektora vyzýva splnomocnenkyňu na odstúpenie. *Platforma pre demokraciu*. https://www.predemokraciu.sk/2026/02/09/120-osobnosti-obcianskeho-sektora-vyzyva-splnomocnenkynu-na-odstupenie/

21 Hallon, T. (2026b, June 3). Vláda obmedzuje prístup MNO k verejným zdrojom, sektor stráca milióny eur. *Platforma pre demokraciu*. https://www.predemokraciu.sk/2026/06/03/vlada-obmedzuje-pristup-mno-k-verejnym-zdrojom-sektor-straca-miliony-eur-2/

22 ICJK. (2025). *Platená nenávisť: Útoky na novinárov najviac sponzorovali politici na Slovensku a v Maďarsku, platformy nezakročili*. Investigatívne centrum Jána Kuciaka. https://www.icjk.sk/419/Platena-nenavist-Utoky-na-novinarov-najviac-sponzorovali-politici-na-Slovensku-a-v-Madarsku-platformy-nezakrocili

23 ifp. (2024, April 25). Daňová asignácia. *Inštitút finančnej politiky*. https://ifp.sk/danova-asignacia/

24 Janočko, J. (2025). Country Cases: Slovakia. In *Good Practices in Strengthening the Resilience of Civic Space in the Czech Republic, Slovakia, Croatia and Slovenia*. Glopolis. https://glopolis.org/aktuality/priklady-dobre-praxe-v-posilovani-odolnosti-obcanskeho-prostoru-v-ceske-republice-na-slovensku-v-chorvatsku-a-slovinsku/

25 JOJ24. (2025, May 19). *Tlačová beseda: Mimovládny sektor a transparentnosť*. https://joj24.noviny.sk/tlacove-besedy/1062177-tlacova-beseda-mimovladny-sektor-a-transparentnost

26 Kaňuchová, T. (2025, July 18). Central Europe at a Crossroads: Insights from GLOBSEC Trends 2025 with Katarína Klingová. *VSquare.Org*. https://vsquare.org/central-europe-at-a-crossroads-insights-from-globsec-trends-2025-with-katarina-klingova/

27 Kimijan, P. (2025, June 20). Vyzývame vládu na diskusiu o lobingu. *VIA IURIS*. https://viaiuris.sk/aktuality/vyzyvame-vladu-na-diskusiu-o-lobingu/

28 Kosnáč, P., Gloss, H., & Cigáneková, V. (2025). *Polarizácia a Antisystém 2025: Slovensko*. DEKK Inštitút. https://www.dekk.institute/wp-content/uploads/2025/07/Polarizacia-a-antisystem-Slovensko-2025.pdf

29 Lindberg, S. I. (2025). *V-DEM Democracy Report 2025 25 Years of Autocratization – Democracy Trumped?* V-Dem Institute. University of Gothenburg. https://www.v-dem.net/documents/60/V-dem-dr__2025_lowres.pdf

30 Lizák, J. (2026, May 26). *Facebook post* [Online post]. https://www.facebook.com/juraj.lizak

31 Lopatka, J., & Lopatka, J. (2025, April 16). Slovakia tightens rules for non-profits in move they see as inspired by Russia. *Reuters*. https://www.reuters.com/world/europe/slovakia-tightens-rules-non-profits-move-they-see-inspired-by-russia-2025-04-16/

32 PDCO. (2026, March 11). *Komora MNO vyzýva vládu a NR SR: Po náleze Ústavného súdu už zákony o MNO nesmú vznikať bez ich účasti*. PDCO. https://www.dobrovolnickecentra.sk/sk/komora-mno/novinky-komora-mno/604-42-zasadnutie-rady-vlady-pre-mno

33 Platforma pre demokraciu. (2025, January 29). Otvorený list občianskeho sektora vláde SR. *Platforma pre demokraciu*. https://www.predemokraciu.sk/2025/01/29/otvoreny-list-obcianskeho-sektora-vlade-sr/

34 RSF. (2026, August 6). *Slovakia*. Reporters Without Borders. https://rsf.org/en/country/slovakia

35 SITA. (2025, March 4). Protesty Slovensko je Európa pokračujú, v piatok budú v 40 mestách doma aj v zahraničí. *domov.sme.sk*. https://domov.sme.sk/c/23458255/protesty-slovensko-je-europa-7-3-2025-zoznam-miest.html

36 SME.sk. (2025, March 31). Zamietli trestné oznámenie ministerky Šimkovičovej na spisovateľa Hvoreckého. *SME.sk*. https://www.sme.sk/domov/c/zamietli-trestne-oznamenie-ministerky-simkovicovej-na-spisovatela-hvoreckeho

37 Štatistický úrad SR. (2025). *Počet nezárobkových organizácií*. Datacube. https://datacube.statistics.sk/#!/view/sk/VBD_SLOVSTAT/ns2003rs/v_ns2003rs_00_00_00_sk

38 Strečanský, B. (2025a). Civil Society in Slovakia 2024-2025: Resisting an Authoritarian Turn. *Observatorium 86*. https://www.maecenata.eu/en/2025/11/19/observatorium-86-civil-society-in-slovakia/

39 Strečanský, B. (2025b). Economic, Social and Cultural Factors. In *Civil Society in Slovakia and Its Resilience. 2025 Report*. Malý Berlín.

40 Strečanský, B., Sloboda, R., Nápoký, Ľ., Oravec, L., Szabová, L., & Kaba, D. (2026a). *Defunding mimovládnych neziskových organizácií 2024-2025*. Platforma pre demokraciu a Nadácia otvorenej spoločnosti Bratislava. https://www.predemokraciu.sk/wp-content/uploads/2026/02/Defunding-kompletna-analyza.pdf

41 Strečanský, B., Sloboda, R., Nápoký, Ľ., Oravec, L., Szabová, L., & Kaba, D. (2026b). *Defunding of Non-Profit Non-Governmental Organizations in Slovakia in 2024-2025*. Platform for Democracy and Foundation for Open Society Bratislava.

42 ta3. (2025, March 28). Na SNS podali trestné oznámenie pre homofóbne bilbordy. Danko bol vypovedať na polícii. *ta3*. https://www.ta3.com/clanok/987239/na-sns-podali-trestne-oznamenie-pre-homofobne-bilbordy-danko-bol-vypovedat-na-policii

43 TASR. (2024, August 2). Neziskové organizácie kritizujú zmeny fungovania fondov, Tomáš Taraba hovorí o priorite podporiť školy. *Aktuality.sk*. https://www.aktuality.sk/clanok/GUh9Tfm/neziskove-organizacie-kritizuju-zmeny-fungovania-fondov-tomas-taraba-hovori-o-priorite-podporit-skoly/

44 TASR. (2026, February 18). *PM Fico: Constitutional Court Protecting NGOs from Scrutiny*. https://www.tasr.sk/tasr-clanok/TASR:2026021800000350

45 Úrad vlády SR (Director). (2025, April 14). *Tlačová konferencia Juraja Gedru, Erika Kaliňáka, Richarda Glücka a Adama Lučanského* [Video recording]. https://www.youtube.com/watch?v=y8k0l2txJ64

46 Úrad vlády SR. (2026, February 18). *Vláda vykoná veľký audit fungovania a financovania mimovládnych organizácií na Slovensku | Úrad vlády Slovenskej republiky*. https://www.vlada.gov.sk/tlacove-spravy/vlada-vykona-velky-audit-fungovania-a-financovania-mimovladnych-organizacii-na-slovensku/

47 ÚS SR. (2025). *Zákon, ktorý novelizuje právnu úpravu mimovládnych organizácií, je v rozpore s ústavou*. Ústavný súd Slovenskej republiky. https://www.ustavnysud.sk/aktualne-informacie/aktuality/-/asset_publisher/B99toBHZi1uA/content/z%C3%A1kon-ktor%C3%BD-novelizuje-pr%C3%A1vnu-%C3%BApravu-mimovl%C3%A1dnych-organiz%C3%A1ci%C3%AD-je-v-rozpore-s-%C3%BAstavou

48 ÚSVROS. (2022, September 7). *Koncepcia rozvoja občianskej spoločnosti na Slovensku na roky 2022 – 2030*. Ministerstvo vnútra Slovenskej republiky. https://www.minv.sk/?ros_kros_2030

49 Vagač, F., Batková, K., Strečanský, B., & Gallová Kriglerová, E. (2025). *Civil Society in Slovakia and its Resilience* (PROSECO Project). Malý Berlín. https://www.malyberlin.sk/en/civil-society-in-slovakia-and-its-resilience/

50 Vláda SR. (2023, November 13). *Programové vyhlásenie vlády SR 2023-2027 „Lepšie, pokojnešie a bezpečnejšie žiť"*. https://www.nrsr.sk/web/Default.aspx?sid=zakony/cpt&ZakZborID=13&CisObdobia=9&ID=27

51 Vláda SR. (2026, February 18). *UZNESENIE VLÁDY SLOVENSKEJ REPUBLIKY č. 60 z 18. Februára 2026 k návrhu na zvýšenie účinnosti kontrolnej činnosti voči mimovládnym neziskovým organizáciám v kontexte nálezu Ústavného súdu Slovenskej republiky PL. ÚS 11/2025-116, s ohľadom na zvýšenie transparentnosti financovania mimovládnych neziskových organizácií a ich činnosti*. Vláda SR.

52 Zajac, M. (2025, July 17). *Výzva Komory MNO na zmenu Zákona č. 1092025Z*. Komora MNO. https://www.dobrovolnickecentra.sk/images/stories/files/V%C3%BDzva_Komory_MNO_na_zmenu_Z%C3%A1kona_%C4%8D._1092025_Z.pdf?fbclid=IwY2xjawMX0BFleHRuA2FlbQIxMABicmlkETE3cGMxcnVIR21EY1dLdXdMAR4KjN8J111sHo_L-Qh_X_wG0-JAu1Hp8-B2vKTjaM5cAsSfOo4KwiJm_1KDCw_aem_xHTMUJUcoAXtadBK1o3SGA

53 Zaťko, I. (2026). *Aký bol 2025 na Donio?* | *Donio*. https://donio.sk/rok-2025?utm_source=chatgpt.com

54 Zigová, I. (2025, January 31). Z protestu v Banskej Bystrici: Žiaden rešpekt ani úcta, robíte z nás terče, znelo od študentky na adresu premiéra. *Aktuality.sk*. https://www.aktuality.sk/clanok/W181eYe/z-protestu-v-banskej-bystrici-ziaden-respekt-ani-ucta-robite-z-nas-terce-znelo-od-studentky-na-adresu-premiera/

Civic Space Report 2025/2026

Georgia

Country Score: **Hostile**

Country Trend: ↘

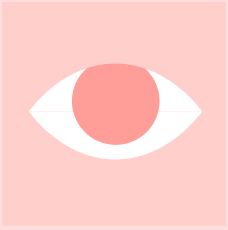
1.30



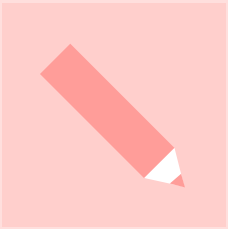
Cluster A: 1.20
A1 Equal treatment: 1
A2 Political recognition as partners: 1
A3 Refrained authorities from smearing: 1
A4 No weaponization of state powers: 1
A5 Transparent and open public institutions: 2



Cluster B: 1.40
B1 Free establishment and operation: 2
B2 CSOs enjoy a safe space: 1
B3 Liberty of resourcing: 1
B4 Enabling fiscal environment: 2
B5 Free expression of criticism: 1



Cluster C: 1.60
C1 Citizens trust: 2
C2 Present in media: 2
C3 Free engagement: 1
C4 CSOs embedded in communities: 2
C5 Freedom of assembly: 1



Cluster D: 1.00
D1 Decision-making participation: 1
D2 Timely consultations: 1
D3 Policies for cooperation: 1
D4 Free advocacy: 1
D5 Government listens: 1

10. Civic Space Report – Georgia

By Nino Kalandadze

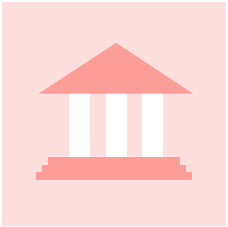
Introduction

Since late 2024, the civic space in Georgia has come under increasing pressure from the Georgian Dream government. Its domestic and foreign policy has become progressively more illiberal and anti-Western, most notably in the decision to postpone EU accession negotiations until 2028. At the same time, the government has increasingly portrayed critical civil society organizations, independent media and the political opposition as agents of hostile foreign interests, seeking not only to restrict their activities but also to undermine their legitimacy. (Sputnik Georgia, 2026b) A growing body of legislation has been introduced along the lines of Russia's "foreign agents" framework, while enforcement powers have been concentrated in an Anti-Corruption Bureau accountable to the Prime Minister. The authorities have also maintained a sustained police crackdown on the protest movement that emerged after the decision to postpone the accession process. In November 2025, the European Commission concluded that Georgian CSOs were operating in "a repressive environment which increasingly deteriorates" and described Georgia as a "candidate country in name only." In December 2025, CIVICUS downgraded Georgia's civic space rating to "Repressed", following its earlier downgrade to "Obstructed" in 2024 (European Commission, 2025; CIVICUS Monitor, 2026).

The role of the courts is particularly important in assessing this trajectory. Unlike in some of the comparator cases examined under this methodology, Georgian courts have not acted as an effective check on the government's legislative agenda. No domestic court has invalidated the Law on Transparency of Foreign Influence, the Foreign Agents Registration Act,

or the expanded powers of the Anti-Corruption Bureau. This is significant given the Venice Commission's finding that the foundational law does not meet the requirements of legality, legitimacy and proportionality necessary to justify restrictions on freedom of association and expression.

The picture that emerges is therefore one in which formal and practical restrictions have developed together. This is not simply a case of legal protections remaining formally in place while their implementation becomes increasingly restrictive. The legal framework itself has been changing, while administrative enforcement, public pressure and the treatment of protesters have moved in the same direction. For the purposes of this assessment, that distinction matters: the deterioration of civic space in Georgia is visible both in the rules governing civil society and in the conditions under which organizations and activists are expected to operate.



Cluster A – Institutional and Political Environment and Narratives of CSOs

A1 – Equal treatment

Standard. *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*[1]

Article 22 of the Constitution of Georgia guarantees freedom of association, and an association may be dissolved only by a court decision. (Constitution of Georgia, 1995) Until 2024, organizations could receive domestic and foreign funding without prior government approval; this changed with the June 12, 2025 amendment to the Law on Grants, which requires prior government consent to receive foreign funding, subject to certain exceptions. (Law of Georgia on Grants, 2025) The Council of Europe's Venice Commission, in a formal urgent opinion, found that the underlying Transparency of Foreign Influence Law fails all four tests required to justify restricting association and expression rights under the European Convention: legality, legitimacy, necessity/proportionality, and non-discrimination — and recommended the law's repeal. (Venice Commission, 2024)

After the Law on Transparency of Foreign Influence was adopted in May 2024, organizations receiving at least 20% of their funding from abroad were required to register as "organizations carrying the interests of a foreign power" — a category consisting almost entirely of government-critical, foreign-funded organizations and media. (BTI Blog, 2024; Law of Georgia on Transparency of Foreign Influence, 2024) The ruling party simultaneously discussed a grant fund for registered organizations, with the Prime Minister thanking those who registered "on their own initiative" (Netgazeti, 2024a) — rewarding compliance under the same law that penalized these organizations, revealing an aim to halt independent operations while incentivizing GONGOs, channeling state resources toward loyalists while critical organizations remain under registration, disclosure, and funding restrictions. In practice, only a small fraction of affected organizations registered — approximately 1.6% of those eligible — while the vast majority publicly refused, declaring their disobedience in a joint statement as a form of civic resistance to the law. (JAMnews, 2024; Human Rights Watch, 2026a)

In November 2025, the State Grant Management Agency announced 17 winning organizations, receiving a total of GEL 1,657,775 (approx. EUR 564,000) — roughly GEL 100,000 (approx. EUR 34,000) each, though four had been established only in 2025. Combined with the Prime

Minister's framing of registration as a form of loyalty worthy of reward, this suggests that the fund was intended to replace critical organizations with government-aligned ones—consistent with Civil Georgia's reporting on a broader effort to substitute Western donor grants with state funding for preferred organizations. (Civil Georgia, 2025a) Regional civil society has been especially hard-hit: of 114 community organizations active in 2024, only 37 remained operational in 2025 (Human Rights Watch, 2026a). In September 2026, Prime Minister Kobakhidze announced that the Agency would be wound down and closed by the end of the year, stating that NGOs are an "artificial phenomenon invented for foreign political intervention"—a statement suggesting that, in the government's view, the state grant replacement strategy had already served its purpose and was no longer considered necessary. (InterPressNews, 2026a)

The Anti-Corruption Bureau's expanded powers (banking information, personal information, grant audits, fines) (Civil Georgia, 2026a) sit uneasily with its head being a Prime Minister appointee — a mechanism Transparency International Georgia itself says fails to guarantee independence. (Transparency International Georgia, 2022)

Trend. The trend is negative: the legal framework has moved consistently toward greater state control since 2024, from the original registration requirement to the Bureau's expanded, unaccountable enforcement powers, with no offsetting reforms in the same period.

Score 1 – Hostile: registration and disclosure requirements, and the Bureau's enforcement powers, have expanded since 2024 with no offsetting reform.

A2 – Political recognition as partners

Standard. *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

The relationship between the government and civil society has deteriorated substantially since the first introduction of the Law on Transparency in 2023 — a version withdrawn after mass protests, then reintroduced and adopted in 2024. Government rhetoric has increasingly portrayed CSOs as politically motivated actors "controlled by external forces," foreign "agents," or involved in attempts to destabilize the country, and officials have repeatedly accused CSOs of preparing or supporting a coup.

Since the introduction of the Law on Transparency of Foreign Influence,[2] cooperation between the authorities and CSOs has effectively collapsed: on April 25, 2024, 126 NGO and media organizations jointly announced they would suspend cooperation with the government until the bill was withdrawn. (Venice Commission, 2024)

Trend. The trend is negative: recognition has moved from adversarial rhetoric in 2023 to organized non-cooperation and targeted restrictions by 2024–2025, with no period of improved relations in between.

Score 1 – Hostile: formal non-cooperation (126 organizations) and targeted electoral-purpose scrutiny have replaced any partnership relationship.

A3 – Authorities refrain from smearing civil society organizations

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

The Law on Transparency of Foreign Influence itself has been central to this process. The original version required organizations receiving at least 20% of their funding from foreign donors to register as "foreign agents." Following sustained public opposition, the government withdrew that

version and replaced “agent” with “organization carrying the interests of a foreign power.” (Civil Georgia, 2026b) The terminology changed, but the stigmatizing aim remained.

The government has made stigmatizing civil society organizations a recurring feature of its political communication. When referring to CSOs, officials have used terms such as “foreign influence,” “external forces,” “Deep State orders,” and “local office of the global war party” — portraying organizations receiving foreign funding as instruments of foreign interests, supporters of the opposition, or facilitators of political unrest.

The campaign has extended beyond organizations to individual CSO leaders. Physical attacks on CSO offices followed the same pattern (see A4 for the June 2024 campaign and its Georgian Dream MP admission). Stigmatizing graffiti also appeared near CSO offices, describing organizations as “enemies of the nation,” “foreign agents,” and “Soros’s agents.” (Radio Free Europe/Radio Liberty Georgia, 2024c) The intimidation extended beyond public campaigns into private life: Front Line Defenders documented that more than 100 Georgian human rights defenders and CSOs received coordinated threatening phone calls in May 2024 alone, often from numbers spoofed to appear foreign, with callers also targeting defenders’ family members. (Front Line Defenders, 2024)

Trend. The trend is negative: stigmatizing rhetoric has escalated from contested legal terminology in 2024 to coordinated, large-scale intimidation campaigns reaching defenders’ families by mid-2024, with no indication of reversal since.

Score 1 – Hostile: state rhetoric and coordinated intimidation campaigns against CSOs and their families are sustained and unreversed.

A4 – No weaponization of state powers

Standard. *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, or emergency measures and principles such as transparency, fiscal due diligence or privacy protection and the like — selectively or disproportionately to pressure CSOs because of their activities or views.*

Under the Law on Transparency of Foreign Influence, the Anti-Corruption Bureau received access to organizations' funding, bank accounts, and activities (the Bureau was later folded into the State Audit Office, effective March 2, 2026). (Civil Georgia, 2026c)

State institutions have increasingly been used to place administrative and financial pressure on civil society organizations, disproportionately affecting those that investigate corruption, monitor elections, or criticize the government. The Bureau used its powers extensively against major watchdog organizations, demanding financial documentation, payroll information, and personal data. (Radio Free Europe/Radio Liberty Georgia, 2025a) In August 2025, authorities seized the financial accounts of seven major organizations. (Radio Free Europe/Radio Liberty Georgia, 2025b; Human Rights Watch, 2026a) Earlier, on September 24, 2024, Bureau head Razhden Kuprashvili classified Transparency International Georgia and NGO Choose Europe as "subjects with a declared electoral purpose." (Radio Free Europe/Radio Liberty Georgia, 2024d) ISFED and the Georgian Young Lawyers' Association (GYLA) came under similar scrutiny. This designation proved short-lived but revealing: the Bureau reversed course on October 2, 2024, the day after PM Kobakhidze publicly called for reconsideration — not an independent correction but proof the ostensibly independent Bureau bends to the Prime Minister's will. (Ambebi.ge, 2024)

Physical attacks have accompanied administrative pressure: Georgian Dream MP Dito Samkharadze acknowledged responsibility for a campaign targeting 22 media, political, and civil society organizations, publishing video of masked individuals carrying out the attacks. (OC Media, 2024)

Trend. The trend is negative and escalating: the Bureau's targeting expanded from a single, briefly reversed designation in September 2024 to systematic financial demands against six organizations and asset freezes against seven more within the following year.

Score 1 – Hostile: Bureau enforcement escalated from an isolated designation to systematic financial demands and asset freezes within a year.

A5 – Transparent and open public institutions

Standard. *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

Georgian legislation formally guarantees access to public information. Article 10 of the General Administrative Code establishes the right of everyone to access information held by administrative bodies, subject to exceptions concerning state, professional, or commercial secrets and personal data. (General Administrative Code of Georgia, 1999)

Actual access to information has increasingly diverged from this legal standard, particularly for watchdog organizations. According to IDFI, of 7,582 requests submitted to 374 public institutions in 2022, only 58% received a response, just 35% within the statutory ten-day period, and 69 institutions answered none at all. (IDFI, 2022) The situation worsened in 2023: of 1,255 requests over five months, only 94 (7%) received a response. (iFact, 2024) Measurement did not continue after 2024, though further deterioration is presumed. An amendment to the Law on Common Courts, effective June 30, 2025, prohibited photography, filming, and broadcasting in court yards, buildings, and hearing rooms without permission. (MediaChecker, 2025) Parliament further restricted media access through its accreditation system. Rules introduced by Parliament

Speaker's order in February 2023 — and significantly tightened by further amendments in June 2026 — require journalists to stop questioning a member of parliament the moment the official declines to comment; violation results in accreditation suspension. The June 2026 amendments allow accreditation to be revoked for the entire media organization, not only the individual journalist, and increased the maximum suspension from six months to one year. Under these rules, over 15 journalists from independent outlets had their parliamentary accreditation suspended or revoked in the two months prior to the amendments alone, effectively barring critical media from covering parliamentary proceedings. (Transparency International Georgia, 2026c; Civil Georgia, 2026i)

The Georgian Court Watch's 2023 Court Efficiency Index gave judicial transparency a score of only 23%: courts fail to publish rulings, information is hard to obtain, the High Council of Justice no longer publishes minutes or allows attendance, and the judiciary publishes no annual reports. (Georgian Court Watch, 2023) The growing use of closed court hearings is a further obstacle for public-interest litigation and judicial monitoring — several high-profile cases, including those of special-forces officers accused of violence, former State Security Service head Grigol Liluashvili, and former Prime Minister Irakli Gharibashvili, were heard behind closed doors. (Radio Free Europe/Radio Liberty Georgia, 2023)

Trend. The trend appears negative based on the 2022-2023 data available, though this cannot be confirmed with certainty for 2024-2026 since systematic measurement of response rates did not continue after 2024.

Score 2 – Obstructed: formal transparency guarantees exist, but documented response rates were already poor and post-2024 data is unavailable.

Cluster B – Legal and Financial Framework for Civil Society Organizations

B1 – Free establishment and operation

Standard. *Everyone can freely establish, join or participate in a CSO; CSOs are free to determine their own objectives and activities; and where registration as a legal entity is required, the procedure is clear, simple, quick and inexpensive. The state does not interfere in the internal governance and operations of CSOs; any monitoring, inspection or reporting is defined by law, proportionate to the CSO's size and activities, and not onerous.*

At the formal legal level, establishing a civil society organization remains relatively straightforward: CSOs register as non-commercial, non-profit legal entities, and the process requires only a limited set of founding documents — a charter, the founders' consent, and copies of founders' and board members' identification. (Civil Georgia, 2026d) State approval is therefore not required to establish a CSO.

The same registration and prior-consent requirements that apply generally to foreign-funded organizations also apply here (see A1 for the underlying legal detail and figures) — extending state oversight from external funding sources into what was previously an internal governance decision for each organization.

Establishing a CSO remains formally simple; the significant change is what follows registration.

Trend. The trend is negative: since 2024, operating and obtaining funding has grown steadily more difficult without government intervention, with no reversal in this trajectory to date.

Score 2 – Obstructed: registration itself remains simple, but the same foreign-funding restrictions from A1 apply once a CSO is established.

B2 – CSOs enjoy a safe space and protection from arbitrariness

Standard. *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

Since the adoption of the Law on Transparency of Foreign Influence in 2024, enforcement has focused particularly on organizations working on corruption, human rights, and election monitoring: the Anti-Corruption Bureau — and, from March 2, 2026, the State Audit Office — was empowered to request donor lists, financial transactions, and staff and beneficiary personal data from any organization— including, in one case, personal data on minors and photo/video material, requested from the youth organization "Future Academy" via court order. (On.ge, 2025a; JAMnews, 2025b) Prominent targets included TI Georgia, (TI Georgia, n.d.) GYLA, (GYLA, n.d.) and ISFED, among others (see A4 for the parallel September 2024 designation of these organizations). (ISFED, n.d.)

The cumulative effect has been a growing "chilling effect," with organizations scaling back or terminating activities amid regulatory pressure and funding uncertainty, and donors struggling with the added bureaucracy. In October 2025, the Georgian Institute of Politics (GIP) announced it was suspending operations "indefinitely," with its director attributing the decision to both operating under restrictive laws and the country's broader democratic trajectory. (Civil Georgia, 2025b) In January 2026, Rights Georgia, a watchdog organization with 29 years of experience,

also ended its activities — withdrawing from 200 ongoing cases involving victims of violence and femicide and approximately 500 cases concerning people affected by the August 2008 war. (Civil Georgia, 2026e)

Trend. The trend is negative: enforcement actions and organizational closures have both continued into 2026 with no sign of stabilization since the law's 2024 adoption.

Score 1 – Hostile: enforcement actions and organizational closures have continued into 2026 with no stabilization.

B3 – Liberality of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

The ability of civil society organizations to obtain financial resources has deteriorated sharply since 2024, when foreign-funded organizations became subject to the registration and disclosure requirements described in A1 (Matsne, 2024) — creating a strong disincentive to rely on foreign funding given the political stigma attached to the designation. The situation became more restrictive in 2025, when amendments to the Law on Grants required prior state consent before a foreign grant could be received (see A1) — giving the authorities considerable influence over access to foreign resources. (Law of Georgia on Grants, 2025)

At the same time, the authorities created a state-funded alternative for organizations registered under the new framework (see A1) — leaving organizations dependent on foreign donations facing registration and stigmatization, while those loyal to the authorities could receive direct state support.

Georgian civil society has also become a casualty of collapsing international funding relationships that this legislative environment helped trigger. Georgia had been the largest recipient of USAID assistance in the South Caucasus ($110 million in 2024 alone). (European Leadership Network, 2024) That funding was cut as part of the global suspension of USAID programmes — a decision driven by U.S. domestic politics rather than by Georgia's own legal changes. By contrast, the EU froze €30 million and halted Georgia's accession process specifically in response to the same law (Radio Free Europe/Radio Liberty Georgia, 2024e), while the U.S. separately paused more than $95 million in assistance to the Georgian government on related grounds (Civil Georgia, 2024a). The government's public welcome of the incoming U.S. administration's global USAID suspension (Global Voices, 2025) suggests that the broader shift in international funding may have aligned with, rather than threatened, its agenda, alongside a wider donor shift involving German political foundations, EU institutions, and U.S. agencies. Whether specific European or U.S. private funders also withdrew because of the law itself, rather than for unrelated reasons, could not be independently confirmed from public sources.

Trend. The trend is negative: access to resourcing has narrowed at each step since 2024, from registration requirements to prior-consent rules to a collapsing international donor base.

Score 1 – Hostile: registration, prior-consent rules and a collapsing donor base have narrowed access to resourcing at each step since 2024.

B4 – Enabling fiscal environment

Standard. *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures, and sanction regimes are applied to CSOs proportionately and on a risk basis.*

Georgia's tax system does not, in itself, create major additional obstacles for CSOs. Under Georgian law, grants and donations received by a CSO are exempt from profit tax. Organizations nevertheless pay income tax on employee salaries and VAT when their economic turnover exceeds GEL 100,000. (OC Media, 2026a)

The exemption therefore applies to grants and donations rather than to the organization as a whole. Salaries remain subject to taxation in the same way as in other organizations. (Legal.ge, n.d.) Employers are also required to make a further 2% contribution to the pension fund from their own resources. (National Bank of Georgia, n.d.)

These provisions are applied largely as written: no pattern of discretionary tax audits, AML/CFT misuse, or selective enforcement against CSOs on fiscal grounds has been documented, in contrast to the Anti-Corruption Bureau's use of financial-oversight powers detailed in A4 and B2. The gap between formal rule and lived experience that characterizes most other standards in this report is largely absent here. Domestic philanthropy remains structurally underdeveloped, however: Georgia's tax code offers no incentive for individual giving, and only around a third of CSOs report receiving corporate support (ECNL, 2022) — meaning the exemptions above apply to a funding base that was already thin, well before the 2024–2025 legal changes reduced foreign funding.

Taxation is not the principal obstacle facing civil society in Georgia — the tax framework itself remains relatively manageable. However, the Standard requires not only a workable tax treatment but a framework that actively encourages philanthropy; Georgia's lacks the latter, since, as noted above, domestic philanthropic capacity remains structurally thin. The more serious restrictions on CSO resourcing arise from the legislation governing how organizations can raise and receive funds, particularly foreign grants (see A1, B3), rather than from taxation itself.

Trend. The trend here is neutral to stable: unlike most other standards in this report, the tax framework itself has not been amended in a more restrictive direction during the assessment period.

Score 2 – Obstructed: the tax treatment of grants and salaries is workable, but the framework provides no incentive for private philanthropy, leaving CSOs reliant on a structurally thin domestic funding base.

B5 – Free expression of criticism

Standard. *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

Freedom of expression has deteriorated significantly since 2024. Georgia's position in the Reporters Without Borders Press Freedom Index fell 48 places in three years, from 77th in 2023 to 135th in 2026 (out of 180 countries). (Civil Georgia, 2026f) A TI Georgia report documented more than 180 cases of violence and intimidation against journalists in the first nine months of 2025, with courts and law enforcement reflecting partisan interests through unlawful detention and impunity for perpetrators. (Tabula, 2025a) A parallel stigmatization campaign uses terms such as "external influence" and "local office of the global war party." A February 2025 amendment to the Code of Administrative Offenses (Article 173[16]) classified insults directed at officials as an administrative offense, under which courts fined six journalists in June 2025 over critical social media comments about Georgian Dream lawmakers; in May 2026, the government announced a new Interior Ministry unit tasked with proactively monitoring public communication for "hate speech" and referring cases to court (JAMnews, 2026a; JAMnews, 2026b) — compounding a media environment already narrowing in plurality and independence (see C2).

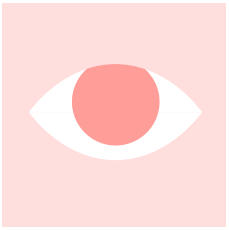
The most severe developments concern restrictions on protest. Since February 2025, the government has passed numerous laws limiting the

right to protest, (Publika, 2025a) including raising maximum administrative detention to 60 days — twice the 30-day limit in Russia and Belarus. (GYLA, 2025) A second road-blocking offense carries a one-year sentence, a third, two years. (Tabula, 2025b)

Under this framework, people have been detained on Rustaveli Avenue for holding a blank banner, standing near Parliament, or simply standing on the sidewalk. (Transparency International Georgia, 2026a)

Trend. The trajectory is consistently downward, with each successive protest-law amendment narrowing the space for lawful dissent further than the last.

Score 1 – Hostile: press-freedom ranking, journalist prosecutions, and protest-related detentions have all worsened sharply since 2024.



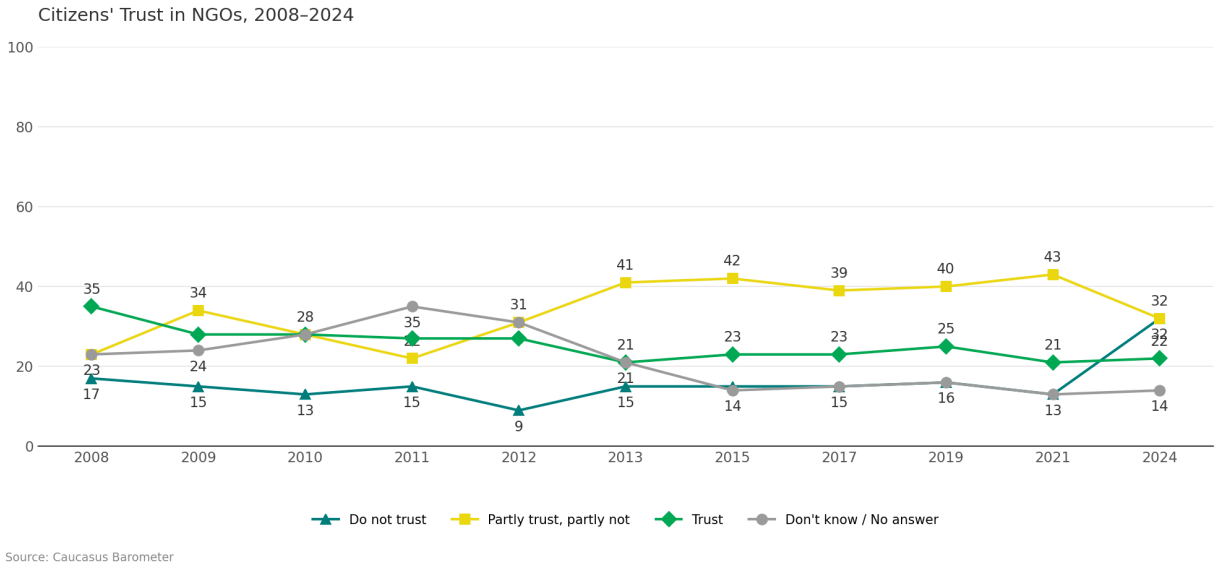
Cluster C – Public Participation and Perceptions of Civil Society Organizations' Work

C1 – Citizens' trust

Standard. *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

Measuring citizens' trust in Georgian civil society has become increasingly difficult due to a scarcity of public opinion polling since 2024. The most recent Caucasus Barometer data reveals a fragmented landscape: 32% of

citizens express distrust toward NGOs, an equal 32% remain ambivalent, 22% report full trust, and 14% decline to answer. (Caucasus Barometer, 2024) Compared to previous years, this marks a clear decline in trust alongside a measurable rise in skepticism.



Citizens' trust in NGOs, 2008–2024. Source: Caucasus Barometer

This erosion of credibility is not merely an organic shift in public sentiment. A 2025 CRRC study demonstrates that the "global war party" narrative, actively propagated by Georgian Dream, directly fuels anti-Western and conspiratorial attitudes, serving as a primary driver of hostility toward the non-governmental sector. (CRRC Georgia, 2025) Given the state's overwhelming advantage in media resources and propaganda, organizations that lose public trust struggle to rapidly mobilize support against smear campaigns, leaving them acutely vulnerable to state-led disinformation.

Trend. Looking ahead, the trend is negative: intensified dehumanization campaigns by authorities, coupled with the sector's mounting financial and organizational crises, point toward a continued downward trajectory rather than stabilization.

Score 2 – Obstructed: trust is fragmented (32% distrust, 22% trust) and declining amid state-driven disinformation.

C2 – Pluralistic representation in media

Standard. *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

An April 2026 broadcasting law amendment banned foreign funding for broadcasters, directly forcing "Formula" to cancel its early-morning programming. (Radio Free Europe/Radio Liberty Georgia, 2026)

Media coverage of Georgia's civil sector reflects the country's sharply polarized information landscape. Independent media generally provides robust, impartial coverage, regularly hosting sector representatives. However, the institutional and financial fragility of these outlets worsened significantly between 2025 and 2026: the television channel "Mtavari Arkhi" ceased broadcasting entirely in May 2025 following a funding crisis. (Radio Free Europe/Radio Liberty Georgia, 2025c) Even independent online media struggles to survive on public donations; the "Sinatle Media" coalition (22 outlets) raised a mere 100,000 GEL over three months in 2025 to maintain operations amid relentless discrediting campaigns. (InterPressNews, 2025a)

Conversely, pro-government media consistently frames civil society through a biased lens, systematically denying airtime to civic representatives and frequently spearheading smear campaigns. Notable examples include a March 2026 attack on the former Public Defender, falsely alleging she asked the German ambassador to revoke Georgia's visa liberalization, (MythDetector, 2026a) alongside similar campaigns against journalist and Netgazeti editor-in-chief Mzia Amaghlobeli, now a political prisoner, and broader accusations that civil society acts as a foreign agent or coup facilitator. (MythDetector, 2026b; Imedi News, 2026; Netgazeti, 2026a; Amnesty International, 2026)

A 2025 MDF Georgia study found that 45% of respondents primarily consume news from pro-government channels, compared to just 23% for independent outlets, while 26% avoid television news entirely. (MDF Georgia, 2025)

Trend. The trend is negative: independent outlets have lost both funding and audience share since 2025, while state pressure on broadcasters has continued into 2026.

Score 2 – Obstructed: independent outlets remain active but are losing funding and audience share to pro-government media.

C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.*

A March 2026 legal change explicitly banned legal entities from engaging in public political activity. (BM.ge, 2026) Under the amendments, a legal entity found to have engaged in political activity outside its core business purpose faces an administrative fine of GEL 20,000, escalating to criminal liability for repeat violations (Georgia Today, 2026) (see D4). According to legal experts, the wording of the legislation is vague and it's hard to determine exactly what conduct might give rise to criminal liability (BLB, 2026), which is a ground for selective justice and political persecution.

Civic engagement in Georgia grew markedly more perilous between 2025 and 2026, as new legislation severely curtailed avenues for public participation. Authorities have increasingly weaponized laws restricting freedom of expression, sentencing dozens to administrative detention merely for standing on sidewalks or blocking roads. (Transparency International Georgia, 2026b; Netgazeti, 2025) In May 2026, activist Zurab Menteshashvili became the first person criminally convicted

under the tightened protest legislation, sentenced to nine months for repeatedly "blocking the road"; released July 31, 2026, he said he would continue protesting. (Publika, 2026) A second person was similarly charged in Zugdidi in March 2026, before release via a plea agreement. (OC Media, 2026b) The broader environment for free expression has similarly degraded. Courts now routinely issue summonses, fines, and administrative detentions against activists, journalists, and ordinary citizens for their social media posts, (Tabula, 2026; Ambebi.ge, 2026; Formula News, 2025a; Publika, 2025b) while police regularly detain individuals over protest banners. (Civil Georgia, 2026g) Beyond legal restrictions, civic activists face organized violence from both unpunished criminal groups and law enforcement officers employing excessive force. (Tabula, 2025c; Tabula, 2025d; Tabula, 2025e; Human Rights Watch, 2026b) Law enforcement routinely fails to investigate these incidents.

Donations historically sustained Georgian civic activism, but a March 2025 prosecutor-ordered freeze on protest-support funds (see C5) now leaves similar fundraising efforts at risk of the same fate, (Tabula, 2025f) drastically chilling citizen philanthropy. While volunteer activity remains technically legal, active participation in civic life now entails significant personal safety risks, driven by a sharp rise in political violence over the past two years.

Trend. The trend is negative and worsening: each successive year since 2024 has added new legal and practical barriers to civic participation, with no countervailing improvement identified.

Score 1 – Hostile: criminal liability for protest, organized violence against activists, and frozen donation channels have made civic participation actively dangerous.

C4 – CSOs embedded in communities

Standard. *CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.*

Georgian civil society previously demonstrated strong grassroots mobilization capacity, particularly during the 2023–2024 mass protests against restrictive legislative initiatives. (Civil Georgia, 2024b) Civil society organizations played a leading role in initiating a broad-based movement that united students, artists, educators, (Tabula, 2024) medical professionals, (Netgazeti, 2024b) athletes, and prominent public figures. (Radio Free Europe/Radio Liberty Georgia, 2024f) Although this diverse coalition successfully forced the regime to temporarily back down in 2023, Georgian Dream ultimately adopted the re-initiated repressive legislation in 2024 despite renewed public outcry.

As authoritarian consolidation accelerated through 2025 and 2026, the sector's operational capacity has been severely weakened by critical funding shortages, pervasive state control, and the constant threat of political persecution: some organizations have dissolved entirely, others have relocated abroad, and the state has frozen the bank accounts of several more. (Human Rights Watch, 2026c) Today, Georgia's civic sector occupies its weakest position since the country's independence. The sector retains a rich, accumulated legacy of solidarity and cross-sectoral cooperation. Nevertheless, the institutional paralysis induced by sustained state repression currently prevents organizations from translating that experience into effective, on-the-ground action, leaving communities without vital advocacy.

Trend. The trend is clearly negative, with no sign of stabilization: capacity has eroded continuously since 2024 rather than reaching a new equilibrium.

Score 2 – Obstructed: grassroots mobilization capacity that peaked in 2023–2024 has eroded continuously under funding and security pressure.

C5 – Freedom of assembly

> ***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

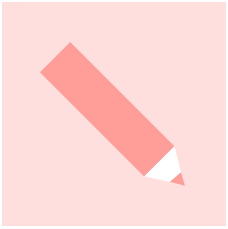
Over the past two years, a confluence of factors has stripped Georgian citizens of their freedom of assembly and association. Authorities have deployed brutal police violence against demonstrators, (Human Rights Watch, 2024) including documented cases of sexual violence against female protesters. (OC Media, 2025) Thousands of demonstrators have faced detention and heavy fines, (Civil Georgia, 2026h) and the judiciary has become increasingly politicized. (Civil Georgia, 2026h) Furthermore, the government has tacitly or explicitly enabled organized criminal groups to target demonstrators, contributing to a landscape with over 90 political prisoners (Transparency International Georgia, 2025a) and more than 150 politically motivated detentions according to Amnesty International. (Amnesty International, 2026)[3] Laws governing expression have tightened to the point that merely standing on a sidewalk in protest is now illegal. (Radio Free Europe/Radio Liberty Georgia, 2024g)

The scale is quantifiable: GYLA documented that fines imposed on protesters for "blocking roads" reached GEL 2 million (approximately $715,000) between November 28, 2024 and March 18, 2025 alone, an increase in the applicable fine from GEL 500 (approx. EUR 170) to

GEL 5,000 (approx. EUR 1,700). Under a politicized judiciary and security apparatus, any citizen choosing to protest automatically risks severe financial penalties or up to 60 days of administrative detention.

Trend. The trend is sharply negative: fines have risen from a GEL 500 (approx. EUR 170) baseline to levels now 35 times the monthly subsistence minimum within roughly two years, with detention periods and criminal liability expanding over the same window.

Score 1 – Hostile: fines, detention limits, and criminal liability for peaceful assembly have all expanded sharply since 2024.



Cluster D – CSOs as Policy Makers

D1 – Right to participate in decision-making including in the policy cycle

Standard. *Everyone has the right to participate in decision-making, and authorities use various mechanisms to ensure meaningful public and CSO participation, with redress for non-compliance. There is regular, open, and effective participation of CSOs across the policy cycle (development, implementation, monitoring); any CSO may participate without discrimination, with timely access to relevant information.*

Government Resolution No. 629 (December 20, 2019) makes public consultation mandatory before any government policy document can be approved (Article 9), requiring stakeholder notification and a summary report of results. (Government of Georgia, 2019) This baseline covers

executive policy-making only — not parliamentary legislation, which follows separate procedures and is where the laws discussed below (the Foreign Agents Registration Act (FARA), the Grants Law) were passed.

By 2026, civil society in Georgia is entirely excluded from the decision-making process. Civil society's last genuine attempt to influence legislation was the 2023 Agents Law hearings, where sustained protest forced a temporary retreat; since 2024, however, Georgian Dream has passed the re-introduced and subsequent laws unilaterally, ignoring the recommendations of international bodies like the OSCE/ODIHR and the Venice Commission. (Social Justice Center, 2025) Compounding this isolation, the Parliament of Georgia amended its Rules of Procedure on February 6, 2025, abolishing the rule mandating civil society participation in decision-making. (Transparency International Georgia, 2025b) The political landscape compounds this exclusion: with three of the four opposition parties refusing their 2024 mandates and the fourth soon ceasing participation, parliament operated as a de facto single-party body, cutting off civil society and formal opposition alike (Transparency International Georgia, 2025c)— opposition party Gakharia for Georgia's later return to parliament did not alter this dynamic. For the past two years, Georgian Dream has legislated unilaterally through accelerated procedures devoid of consultation.

This exclusion extends to the international arena. When Georgian civil society attempts to advocate on the country's behalf abroad, it faces severe backlash, including public attacks and accusations of sabotage or treason. (Formula News, 2025b; IPress, 2025) For example, the pro-government outlet "Imedi" recently characterized an analytical article on Iran by Giorgi Kandelaki as an act of treason. (Imedi TV (Facebook), 2026)[4]

Trend. The trend is negative, moving consistently in one direction: from performative consultation in 2023 to formal abolition of the participation requirement itself in 2025, foreclosing reversal through ordinary political means.

Score 1 – Hostile: the legal requirement for CSO participation in decision-making was formally abolished in February 2025.

D2 – Timely consultations and equal participation

Standard. *Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible (online and offline), so that grassroots and under-resourced CSOs are not excluded due to limited means.*

Civil society not only lacks timely consultation but is actively barred from meaningful participation in policymaking. While a consultation mechanism technically remains on the books, it functions purely as a decorative formality. The Foreign Agents Registration Act illustrates this clearly: registered on February 27, 2025, the bill passed all three readings by April 1 — a rushed, month-long process that bypassed genuine public discussion. (Radio Free Europe/Radio Liberty Georgia, 2025a) A similar pattern emerged with the Law on Grants: backed at first reading in April 2025, and fully adopted by June 12 without public consultation. (JAMnews, 2025a) Ironically, the law itself grants the government a mere 10-day deadline to approve a grant — a stark contrast with the zero time allotted for public deliberation. (JAMnews, 2025a)

Consequently, civil-sector involvement in decision-making is functionally nonexistent — not merely delayed or under-resourced, but absent as a matter of practice. Since the requirement for CSO involvement was itself abolished by the February 6, 2025 amendment to Parliament's Rules of Procedure (see D1), (Radio Free Europe/Radio Liberty Georgia, 2025d) there is no formal channel through which grassroots or under-resourced organizations, which depend most on guaranteed rather than discretionary consultation, could participate even if the political will existed.

The shift is from bad faith to no obligation at all: where 2023's discussions were at least performative, consultation is now formally, not merely practically, absent.

Trend. The trend is negative: this represents a clear escalation from evasion to outright legal abolition of the consultation requirement.

Score 1 – Hostile: consultation is formally, not just practically, absent, with major laws passed without public input.

D3 – Policies encourage cooperation with CSOs

Standard. *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

Formal institutional mechanisms for state-civil society cooperation have been systematically dismantled. Between November 2024 and October 2025, parliament abolished the Open Government Council and eliminated the requirement for parliamentary committees to submit annual action plans. Legislative proposals are no longer debated in committee; instead, they are routed directly to MPs. (Transparency International Georgia, 2025c) Furthermore, working-group minutes and detailed meeting information have vanished from official websites. (InterPressNews, 2025b) The government also abolished the "Minister's Hour" and the institution of thematic inquiry. During the reporting period, no committee summoned an official for a hearing, and MPs submitted a total of only four parliamentary questions. (InterPressNews, 2025b) As Transparency International Georgia concluded, parliament "has finally refused to cooperate with civil society and has adopted laws whose purpose is the abolition of Georgian NGOs." (InterPressNews, 2025b) In April 2026, the Open Government Partnership permanently suspended Georgia, concluding that "the conditions necessary for participation in OGP, including an enabling environment for government and civil society collaboration, are no longer present." (Open Government Partnership, 2026) The Anti-Corruption Bureau's oversight functions were themselves restructured during this period, folded into the State Audit Office effective March 2, 2026 (see A4, B2) — consolidating, rather than diffusing, the state's oversight powers over CSOs.

Rather than fostering collaboration, Georgian Dream's recent strategy focuses on maximizing restrictions on civic space. This is evident in the steady adoption of restrictive laws, (Transparency International Georgia, 2025b) state-sponsored discrediting campaigns, (Amnesty International, 2026) and the tacit encouragement of violence and persecution against activists. (Amnesty International, 2026)

Transparency International Georgia's one-year review (2024–2025) confirms that this regression is consistent, not episodic.

Trend. The trend is clearly negative: cooperation mechanisms have been dismantled one by one over a sustained 18-month period rather than through a single event, and TI Georgia's own review found no reversal within that window. The systematic closure of the legislative process directly reinforces the exclusion detailed in D1 and D2: without consultative bodies, civil society lacks even the basic means to stay informed, let alone exert influence.

Score 1 – Hostile: consultative bodies and reporting mechanisms have been dismantled systematically since late 2024.

D4 – Free advocacy and watchdogging

Standard. *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Civil society currently confronts two primary obstacles in executing its advocacy and watchdog functions: severe financial constraints driven by repressive laws, frozen bank accounts, and the suspension of foreign funding; and organized, often violent, public smear campaigns. A March 2026 law goes further, imposing administrative fines (rising to criminal liability on repeat violations) on any legal entity found to have engaged in political activity outside its stated purpose (Georgia Today, 2026) — CSOs are covered as legal entities, though the statute itself does not

name them specifically (see C3). Authorities apply these restrictive laws with calculated selectivity, targeting watchdog organizations that pose the greatest threat to state impunity — most visibly TI Georgia, targeted through both the "declared electoral purpose" designation and demands for financial documentation from six leading watchdog groups (see A4). (Radio Free Europe/Radio Liberty Georgia, 2024d; Radio Free Europe/Radio Liberty Georgia, 2025a) The state has also blocked specific advocacy funding at the source: it rejected a UK Embassy-funded project supporting four Georgian organizations monitoring the 2025 municipal elections, which Parliament Speaker Shalva Papuashvili publicly attacked as "funding extremism, hatred, and propaganda." (Human Rights Watch, 2026a)

The state has also directly curtailed election monitoring, a cornerstone of civic watchdogging. April 2025 amendments to the election law banned polling station observers from photographing or filming inside the polling station and from requesting voter identification, changes that ISFED assessed as substantially undermining effective electoral observation. (ISFED, 2025)

Trend. The trend is negative: restrictions on advocacy have expanded consistently since 2023 — from broad legislative frameworks to targeting specific functions like election monitoring and anti-corruption research — confirming a deliberate design to neutralize accountability activities, not incidental overreach.

Score 1 – Hostile: financial pressure, targeted designations, and curtailed election monitoring have deliberately narrowed advocacy and watchdog functions.

D5 – Government listens

Standard. *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

Over the past two years, Georgian authorities have not once incorporated civil society's positions into decision-making. Georgian Dream openly rejects collaboration with the sector, routinely labeling CSOs "agents of foreign influence" or "conduits of foreign interests." International recommendations fare no better: the Venice Commission urged withdrawal of the "Law on Transparency of Foreign Influence" in May 2024, and PACE co-rapporteurs reaffirmed in November 2025 that this law and subsequent legislation (FARA, the Law on Grants) violate European standards — both calls remain unfulfilled. (Council of Europe, 2024; Council of Europe, 2025)

The most measurable indicator of this institutional deafness is parliament's handling of the Public Defender's reports: the 2025 resolution completely ignored 44 recommendations from the 2024 report, mirroring the preceding year's pattern of disregard — a pattern that continued into June 2026, when parliament merely "took note of" the Public Defender's latest report without any obligation to act on it. (Public Defender's Office of Georgia, 2024; Sputnik Georgia, 2026a)

This absence of a feedback mechanism is structural, not incidental: neither domestic institutions like the Public Defender nor external bodies like the Venice Commission or PACE can trigger a reasoned policy response.

Trend. The trend is negative and consistent rather than worsening further: non-responsiveness has held steady at essentially zero across 2024, 2025, and 2026 rather than fluctuating.

Score 1 – Hostile: CSO and Public Defender input has been consistently disregarded with no functioning feedback mechanism since 2024.

Conclusion

Read together, the 20 standards point to one overarching conclusion: the period from January 2025 to June 2026 is best understood as a period of cumulative pressure rather than one defined by a single decisive event.

Legislative changes, administrative measures and increasingly hostile political rhetoric have reinforced one another over time. During this period, civil society has had to operate under the Law on Transparency of Foreign Influence and its successor, the Foreign Agents Registration Act. Further restrictions have followed through extensive amendments to the Law on Grants, including a requirement for government pre-approval of foreign funding. A State Grant Management Agency has also been established to channel public funding toward government-aligned organizations. Meanwhile, the Anti-Corruption Bureau has been given broad powers to freeze assets, require the disclosure of personal and beneficiary information, and designate organizations as having a "declared electoral purpose." These formal measures have been accompanied by sustained public attacks on named CSO leaders by senior government officials, as well as an increasingly punitive response to protest activity, including fines, detentions and criminal prosecutions.

References

1 Ambebi.ge. (2024). How Eka Gigauri and Khatuna Lagazidze responded to the Anti-Corruption Bureau's decision — 'We won, Georgian civil society won.' https://www.ambebi.ge/article/315924-rogor-exmaurebian-eka-gigauri-da-xatuna-lagazize-a/

2 Ambebi.ge. (2026). https://sakartvelosambebi.ge/ge/akhali-ambebi/facebook-ze-politsielebis-shesakheb-postis-gamo-mokalake-15-dghit-daapatimres

3 Amnesty International. (2026). https://www.amnesty.org/en/documents/eur56/1115/2026/en/

4 BLB. (2026). https://blb.ge/amendments-to-the-criminal-code-of-georgia-expulsion-of-citizens-and-organizations-from-political-discourse/

5 BM.ge. (2026). https://bm.ge/news/biznesis-politikurisazogadoebrivi-aqtivobis-kriminalizatsia-anu-biznesis-dumilis-kanonianalizi

6 BTI Blog. (2024). Georgia on the Edge of Autocracy: How the Foreign Agents Law Stifles Georgia's European Aspirations.. https://blog.bti-project.org/2024/08/08/georgia-on-the-edge-of-autocracy-how-the-foreign-agents-law-stifles-georgias-european-aspirations/

7 CRRC Georgia. (2025). https://crrc.ge/angarishi-konspiratsiuli-theoriebi-da-anti-dasavluri-damokidebulebebi-sakharthveloshi

8 Caucasus Barometer. (2024). https://caucasusbarometer.org/ge/cb-ge/TRUNGOS/

9 CIVICUS Monitor. (2026). Civic space continues to deteriorate as repressive new laws enforced. https://monitor.civicus.org/explore/civic-space-continues-to-deteriorate-as-repressive-new-laws-enforced/

10 Civil Georgia. (2024a). U.S. Pauses USD 95 Million Assistance to Georgian Government.. https://civil.ge/archives/618483

11 Civil Georgia. (2024b). https://civil.ge/archives/586354

12 Civil Georgia. (2025a). GD Government Creates State Grant Agency Amid Controversial Legal Changes.. https://civil.ge/archives/677192

13 Civil Georgia. (2025b). report on the Georgian Institute of Politics ending its operations. https://civil.ge/archives/703926

14 Civil Georgia. (2025c). GYLA: Fines Imposed on Protesters – Severe Violation of Freedom of Assembly,. https://civil.ge/archives/670184

15 Civil Georgia. (2026a). Anti-Corruption Bureau to Be Abolished in 2026, Audit Office to Absorb Its Functions.. https://civil.ge/archives/710935

16 Civil Georgia. (2026b). https://civil.ge/archives/723111

17 Civil Georgia. (2026c). report on the transfer of Anti-Corruption Bureau powers to the State Audit Office. https://civil.ge/ka/archives/711003

18 Civil Georgia. (2026d). https://civil.ge/archives/625781

19 Civil Georgia. (2026e). report on Rights Georgia ending its activities. https://civil.ge/archives/717053

20 Civil Georgia. (2026f). report on Georgia's position in the Reporters Without Borders Press Freedom Index. https://civil.ge/archives/732593

21 Civil Georgia. (2026g). https://civil.ge/archives/746002

22 Civil Georgia. (2026h). https://civil.ge/archives/739284

23 Civil Georgia. (2026i). Parliament tightens accreditation rules for critical media. https://civil.ge/archives/737744

24 Constitution of Georgia. (1995). https://matsne.gov.ge/ka/document/view/30346?publication=36&utm_source=chatgpt.com

25 Council of Europe. (2024). https://www.coe.int/en/web/portal/-/georgia-should-repeal-the-law-on-transparency-of-foreign-influence-in-its-current-form-says-venice-commission

26 Council of Europe. (2025). https://pace.coe.int/en/news/10104/pace-monitors-for-georgia-call-for-an-immediate-end-to-politically-motivated-legal-actions-against-opposition-parties-and-their-leadership

27 ECNL. (2022). https://ecnl.org/sites/default/files/2022-11/Assessment-of-the-Legal-Environment-for-CSOs.pdf

28 European Commission. (2025, November 4). Georgia 2025 Report (SWD(2025) 757 final). https://enlargement.ec.europa.eu/document/download/b3089ad4-26be-4c6a-84cc-b9d680fe0a48_en?filename=georgia-report-2025.pdf

29 European Leadership Network. (2024). The day after: Future of development aid in Ukraine, Georgia, and Moldova.. https://europeanleadershipnetwork.org/commentary/the-day-after-future-of-development-aid-in-ukraine-georgia-and-moldova/

30 Formula News. (2025a). https://formulanews.ge/News/126789

31 Formula News. (2025b). https://formulanews.ge/News/CSF:*%E1%83%95%E1%83%90%E1%83%9C%E1%83%9D*%E1%83%A9%E1%83%AE%E1%83%98%E1%83%99%E1%83%95%E1%83%90%E1%83%AB%E1%83%98%E1%83%A1%E1%83%97%E1%83%95%E1%83%98%E1%83%A1_%E1%83%9D%E1%83%A0%E1%83%92%E1%83%90%E1%83%9C%E1%83%98%E1%83%96%E1%83%94%E1%83%91%E1%83%A3%E1%83%9A%E1%83%98_%E1%83%AF%E1%83%92%E1%83%A3%E1%83%A4%E1%83%98%E1%83%A1_%E1%83%93%E1%83%90%E1%83%AE%E1%83%95%E1%83%94%E1%83%93%E1%83%A0%E1%83%90_%E1%83%AE%E1%83%94%E1%83%9A%E1%83%98%E1%83%A1%E1%83%A3%E1%83%A4%E1%83%9A%E1%83%94%E1%83%91%E1%83%98%E1%83%A1_%E1%83%9B%E1%83%98%E1%83%94%E1%83%A0_%E1%83%99%E1%83%9D%E1%83%9D%E1%83%A0%E1%83%93%E1%83%98%E1%83%9C%E1%83%98%E1%83%A0%E1%83%94%E1%83%91%E1%83%A3%E1%83%9A%E1%83%98%E1%83%90/113030

32 Front Line Defenders. (2024). statement on coordinated intimidating calls targeting Georgian human rights defenders, June 5, 2024. https://www.frontlinedefenders.org/en/statement-report/georgia-coordinated-intimidation-campaign-against-human-rights-defenders

33 GYLA. (2025). analysis of restrictions on the right to protest. https://gyla.ge/post/qartuli-ocneba-protestis-uflebis-bevr-aspeqts-zgudavs

34 GYLA. (n.d.). organizational information. https://gyla.ge/who-we/mission

35 General Administrative Code of Georgia. (1999). Article 10 (right to access information held by administrative bodies).

36 Georgia Today. (2026). https://georgiatoday.ge/parliament-approves-legislative-amendments-tightening-rules-on-grants-and-political-activities/

37 Georgian Court Watch. (2023). *Court Efficiency Index 2023 – Judicial Transparency*. https://courtwatch.ge/articles/transparency-judiciary

38 Global Voices. (2025). Uncertain times for NGOs and foreign assistance in Georgia.. https://globalvoices.org/2025/02/10/uncertain-times-for-ngos-and-foreign-assistance-in-georgia/

39 Government of Georgia. (2019). On Approval of the Rule for Development, Monitoring and Evaluation of Policy Documents,. https://faolex.fao.org/docs/pdf/geo205261.pdf

40 Human Rights Watch. (2024). https://www.hrw.org/news/2024/12/23/georgia-brutal-police-violence-against-protesters

41 Human Rights Watch. (2026a). Georgia: New Laws Devastate Independent Civic Groups,. https://www.hrw.org/news/2026/07/09/georgia-new-laws-devastate-independent-civic-groups

42 Human Rights Watch. (2026b). https://www.hrw.org/sites/default/files/media_2026/01/WR2026%20web_2.pdf

43 Human Rights Watch. (2026c). https://www.hrw.org/world-report/2026/country-chapters/georgia

44 IDFI. (2022). *Access to Public Information in Georgia 2022*. https://idfi.ge/ge/access_to_public_information_in_georgia_2022_

45 IPress. (2025). https://ipress.ge/news/politika/shalva-papuashvili-eka-gigaurma-samizne-mounishna-donorebs-rom-kargad-damiznebit-zustad-gaartyan-chvens-qveyanas

46 ISFED. (2025). statement on amendments restricting election observation. https://isfed.ge/geo/gantskhadebebi/tseskos-mier-dadgenilebit-mighebuli-tsvlilebebi-arsebitad-zghudavs-saarchevno-protsesis-efeqtianad-dakvirvebis-shesadzleblobas-

47 ISFED. (n.d.). organizational history. https://www.isfed.ge/geo/istoria

48 Imedi News. (2026). https://imedinews.ge/ge/politika/401538/ver-shemdgari-grantebis-revolutsia-imedis-kviris-reportaji

49 InterPressNews. (2025a). https://www.interpressnews.ge/ka/article/855490-22-onlain-media-ertobliv-gancxadebas-avrcelebs/

50 InterPressNews. (2025b). https://www.interpressnews.ge/ka/article/856101-saertashoriso-gamchvirvaloba-parlamentis-mier-migebulia-kanonebit-paktobrivad-gaukmda-sitqvisa-da-gamoxatvis-tavisupleba-gauaresda-mediis-tavisuplebis-garantiebi-sheizguda-pasiuri-saarchevno-upleba/

51 InterPressNews. (2026a). Government closes the State Grant Management Agency. https://www.interpressnews.ge/ka/article/879824-mtavroba-grantebis-martvis-saagentos-xuravs

52 JAMnews. (2024). report on Bidzina Ivanishvili's statements concerning NGOs and foreign funding. https://jam-news.net/ge/ivanishvilis-gamosvla-mitingze/

53 JAMnews. (2025a). https://jam-news.net/ge/grantebis-shesakheb-kanoni/

54 JAMnews. (2025b). Commentary on beneficiary personal data demands by the Anti-Corruption Bureau. https://jam-news.net/ge/nona-qurdovanidzis-komentari/

55 JAMnews. (2026a). Threat of censorship: What we know about Georgia's new Interior Ministry department overseeing public communication. https://jam-news.net/threat-of-censorship-what-we-know-about-georgias-new-interior-ministry-department-overseeing-public-communication/

56 JAMnews. (2026b). Georgia to create agency to monitor "aggressive communication in public spaces." https://jam-news.net/georgia-to-create-agency-to-monitor-aggressive-communication-in-public-spaces/

57 Law of Georgia on Grants. (2025).

58 Law of Georgia on Transparency of Foreign Influence. (2024).

59 Legal.ge. (n.d.). information on taxation of NGOs. https://legal.ge/ka/service/arakomertsiuli-organizatsiebis-ka/arasamtavrobo-organizatsiis-aaip-registratsia-ka

60 MDF Georgia. (2025). https://mdfgeorgia.ge/case/%e1%83%9b%e1%83%94%e1%83%93%e1%83%98%e1%83%98%e1%83%a1-%e1%83%9b%e1%83%9d%e1%83%ae%e1%83%9b%e1%83%90%e1%83%a0%e1%83%94%e1%83%91%e1%83%98%e1%83%a1%e1%83%90-%e1%83%93%e1%83%90-%e1%83%93%e1%83%94/

61 Matsne. (2024). https://matsne.gov.ge/ka/document/view/6171895?publication=1&utm_source=chatgpt.com

62 MediaChecker. (2025). report on restrictions on media work in Georgian courts. https://www.mediachecker.ge/mediaethika/100779-mediisthvis-sasamarthloshi-mushaoba-mnishvnelovnad-sheizghuda

63 MythDetector. (2026a). https://mythdetector.com/ka/sakhelisuphlebo-mediebis-inphormatsiuli-sinqroni-sakhelmtsipho-aparatthan/

64 MythDetector. (2026b). https://mythdetector.com/ka/mzia-amaghlobeli-qarthuli-otsnebis-prosakhelisuphlebo/

65 National Bank of Georgia. (n.d.). funded pension scheme. https://nbg.gov.ge/page/dagrovebiti-sapensio-skema

66 Netgazeti. (2024a). report on the state grant program for civil society organizations. https://netgazeti.ge/life/741138/

67 Netgazeti. (2024b). https://netgazeti.ge/news/721334/

68 Netgazeti. (2025). https://netgazeti.ge/life/795062/

69 Netgazeti. (2026a). https://netgazeti.ge/life/783744/

70 Netgazeti. (2026b). https://batumelebi.netgazeti.ge/news/615439/

71 OC Media. (2024). report on Dito Samkharadze's admission concerning attacks on NGO and opposition offices. https://oc-media.org/georgian-dream-mp-admits-to-attacks-on-ngo-and-opposition-offices/

72 OC Media. (2025). https://oc-media.org/you-100-whores-police-obscenity-and-violence-against-women-protesters-in-georgia/

73 OC Media. (2026a). https://oc-media.org/us-embassy-says-georgias-hate-speech-monitor-is-troubling-warns-of-free-speech-infringement/

74 OC Media. (2026b). Georgian protester released after nine months in prison for 'road-blocking',. https://oc-media.org/georgian-protester-released-after-nine-months-in-prison-for-road-blocking/

75 On.ge. (2025a). Report on Anti-Corruption Bureau demands for third-party personal data, including from the youth organization "Future Academy." https://on.ge/story/145143-%E1%83%90%E1%83%9C%E1%83%A2%E1%83%98%E1%83%99%E1%83%9D%E1%83%A0%E1%83%A3%E1%83%A4%E1%83%AA%E1%83%98%E1%83%A3%E1%83%9A%E1%83%98-%E1%83%91%E1%83%98%E1%83%A3%E1%83%A0%E1%83%9D-%E1%83%90%E1%83%A0%E1%83%90%E1%83%A1%E1%83%90%E1%83%9B%E1%83%97%E1%83%90%E1%83%95%E1%83%A0%E1%83%9D%E1%83%91%E1%83%9D-%E1%83%9D%E1%83%A0%E1%83%92%E1%83%90%E1%83%9C%E1%83%98%E1%83%96%E1%83%90%E1%83%AA%E1%83%98%E1%83%94%E1%83%91%E1%83%A1-%E1%83%90%E1%83%A0%E1%83%A9%E1%83%94%E1%83%95%E1%83%9C%E1%83%94%E1%83%91%E1%83%96%E1%83%94-%E1%83%93%E1%83%90%E1%83%99%E1%83%95%E1%83%98%E1%83%A0%E1%83%95%E1%83%94%E1%83%91%E1%83%90%E1%83%A1-%E1%83%93%E1%83%90-%E1%83%99%E1%83%90%E1%83%9B%E1%83%9E%E1%83%90%E1%83%9C%E1%83%98%E1%83%94%E1%83%91%E1%83%98%E1%83%A1-%E1%83%93%E1%83%90%E1%83%92%E1%83%94%E1%83%92%E1%83%9B%E1%83%95%E1%83%90%E1%83%A1-%E1%83%94%E1%83%93%E1%83%90%E1%83%95%E1%83%94%E1%83%91%E1%83%90

76 Open Government Partnership. (2026). https://www.opengovpartnership.org/news/georgia-permanently-suspended-from-the-open-government-partnership-following-response-policy-review/

77 Public Defender's Office of Georgia. (2024). https://www.ombudsman.ge/geo/akhali-ambebi/sakartvelos-parlamentis-dadgenileba-sakhalkho-damtsvelis-2024-tslis-saparlamento-angarishis-taobaze

78 Publika. (2025a). report on legislation restricting the right to protest. https://publika.ge/ocnebis-parlamentma-miigho-protestis-shemzghudavi-kanonproeqti/

79 Publika. (2025b). https://publika.ge/eka-mishveladzecebook-postis-gamo-4-000-larit-daajarimes/

80 Publika. (2026). https://publika.ge/gzis-khelmeored-gadaketvistvis-zura-menteshashvili-siskhlis-samartlis-damnashaved-cnes/

81 Radio Free Europe/Radio Liberty Georgia. (2023). report on closed court hearings. https://www.radiotavisupleba.ge/a/%E1%83%A0%E1%83%95%E1%83%90-%E1%83%93%E1%83%90%E1%83%AE%E1%83%A3%E1%83%A0%E1%83%A3%E1%83%9A%E1%83%98-%E1%83%A1%E1%83%90%E1%83%A1%E1%83%90%E1%83%9B%E1%83%90%E1%83%A0%E1%83%97%E1%83%9A%E1%83%9D-%E1%83%9E%E1%83%A0%E1%83%9D%E1%83%AA%E1%83%94%E1%83%A1%E1%83%98/33761929.html

82 Radio Free Europe/Radio Liberty Georgia. (2024c). report on stigmatizing graffiti targeting NGOs. https://www.radiotavisupleba.ge/a/32939391.html

83 Radio Free Europe/Radio Liberty Georgia. (2024d). report on the Anti-Corruption Bureau's designation of NGOs as organizations with an electoral purpose. https://www.radiotavisupleba.ge/a/33136356.html

84 Radio Free Europe/Radio Liberty Georgia. (2024e). EU Halts Georgia's Accession, Freezes Financial Assistance.. https://www.globalsecurity.org/military/library/news/2024/07/mil-240709-rferl02.htm

85 Radio Free Europe/Radio Liberty Georgia. (2024f). https://www.radiotavisupleba.ge/a/%E1%83%A1%E1%83%90%E1%83%AE%E1%83%90%E1%83%9A%E1%83%AE%E1%83%9D-%E1%83%9E%E1%83%A0%E1%83%9D%E1%83%A2%E1%83%94%E1%83%A1%E1%83%A2%E1%83%98-%E1%83%9C%E1%83%A3-%E1%83%9B%E1%83%98%E1%83%94%E1%83%A7%E1%83%A0%E1%83%93%E1%83%9C%E1%83%9D%E1%83%91%E1%83%98%E1%83%97-%E1%83%A0%E1%83%A3%E1%83%A1%E1%83%94%E1%83%97%E1%83%A1/32898902.html

86 Radio Free Europe/Radio Liberty Georgia. (2024g). https://www.radiotavisupleba.ge/a/%E1%83%A2%E1%83%A0%E1%83%9D%E1%83%A2%E1%83%A3%E1%83%90%E1%83%A0%E1%83%96%E1%83%94-%E1%83%93%E1%83%92%E1%83%9D%E1%83%9B%E1%83%98%E1%83%A1-%E1%83%92%E1%83%90%E1%83%9B%E1%83%9D-%E1%83%93%E1%83%90%E1%83%9E%E1%83%90%E1%83%A2%E1%83%98%E1%83%9B%E1%83%A0%E1%83%94%E1%83%91%E1%83%90/33632807.html

87 Radio Free Europe/Radio Liberty Georgia. (2025a). report on Anti-Corruption Bureau requests for information from NGOs. https://www.radiotavisupleba.ge/a/33503912.html

88 Radio Free Europe/Radio Liberty Georgia. (2025b). report on the seizure of NGO financial accounts. https://www.radiotavisupleba.ge/a/33514228.html

89 Radio Free Europe/Radio Liberty Georgia. (2025c). https://www.radiotavisupleba.ge/a/33315755.html

90 Radio Free Europe/Radio Liberty Georgia. (2025d). https://www.radiotavisupleba.ge/a/%E1%83%90%E1%83%A0%E1%83%90%E1%83%A1%E1%83%90%E1%83%9B%E1%83%97%E1%83%90%E1%83%95%E1%83%A0%E1%83%9D%E1%83%91%E1%83%9D-%E1%83%A1%E1%83%94%E1%83%A5%E1%83%A2%E1%83%9D%E1%83%A0%E1%83%A1-%E1%83%99%E1%83%90%E1%83%9C%E1%83%9D%E1%83%9C%E1%83%94%E1%83%91%E1%83%98%E1%83%93%E1%83%90%E1%83%9C-%E1%83%A8%E1%83%9A%E1%83%98%E1%83%90%E1%83%9C/33332839.html

91 Radio Free Europe/Radio Liberty Georgia. (2026). https://www.radiotavisupleba.ge/a/33797817.html

92 Social Justice Center. (2025). https://socialjustice.org.ge/ka/products/kartuli-otsnebis-mier-dachkarebuli-tsesit-mighebuli-sakanonmdeblo-tsvlilebebis-kritikuli-analizi-1

93 Sputnik Georgia. (2026a). https://sputnik-georgia.com/20260623/parlamentma-saxalxo-damcvels-mousmina-299297348.html

94 Sputnik Georgia. (2026b). Opposition hinders trust-building with Abkhazians: PM responds to Gvaramia's words [PM Kobakhidze directly calling opposition politicians "foreign agents"]. https://sputnik-georgia.com/20260818/opozicia-afxazebtan-ndobis-ardgenasi-xels-gvislis-premieri-gvaramias-sityvebs-gamoexmaura-300180890.html

95 Tabula. (2024). https://tabula.ge/en/news/718479-ganatleba-saprtkheshia-25-maiss-propesor

96 Tabula. (2025a). report on violence and intimidation against journalists in 2025. https://tabula.ge/ge/news/741220-2025-clis-9-tveshi-zhurnalistebze-dzaladobis

97 Tabula. (2025b). report on penalties for repeated road blocking during protests. https://tabula.ge/ge/news/741682-aktsiaze-ganmeorebit-gzis-gadaketva

98 Tabula. (2025c). https://tabula.ge/ge/news/734691-lipttan-dagvkhdnen-cicakis-sprei-saghebavi

99 Tabula. (2025d). https://tabula.ge/ge/news/728057-mokalake-ambobs-rom-sakhltan-2-utsnobi-piri-tavs

100 Tabula. (2025e). https://tabula.ge/ge/news/741016-metekhis-khidtan-aktivistebs-studentebs-enm-s

101 Tabula. (2025f). https://tabula.ge/ge/news/732021-pog-dzaladobrivi-kmedebis-dapinansebisa

102 Tabula. (2026). https://tabula.ge/ge/news/750307-facebook-postis-gamo-vakho-sanaias-14-dghiani

103 Transparency International Georgia. (2022). assessment of the Law on the Anti-Corruption Bureau. https://transparency.ge/ge/post/antikorupciuli-biuros-shesaxeb-kanonis-shepaseba

104 Transparency International Georgia. (2025a). https://transparency.ge/en/blog/list-political-prisoners

105 Transparency International Georgia. (2025b). https://transparency.ge/en/post/path-dictatorship-review-georgian-dreams-recent-repressive-legislative-initiatives

106 Transparency International Georgia. (2025c). https://transparency.ge/en/blog/one-party-parliament-and-collapse-democracy-parliamentary-republic

107 Transparency International Georgia. (2026a). report on detention for standing on sidewalks during protests. https://transparency.ge/ge/post/patimroba-trotuarze-dgomistvis-kartuli-sasamartlos-axali-rusuli-standartebi

108 Transparency International Georgia. (2026b). https://transparency.ge/en/post/imprisonment-standing-sidewalk-georgian-courts-new-russian-standards

109 Transparency International Georgia. (2026c). How the Parliament Was Closed Off to Critical Media. https://transparency.ge/en/blog/how-parliament-was-closed-critical-media

110 Transparency International Georgia. (n.d.). organizational information. https://transparency.ge/en

111 Venice Commission. (2024). On Transparency of Foreign Influence. https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2024

112 iFact. (2024). report on access to public information in Georgia. https://ifact.ge/rogor-gartulda-sajaro-informaciis-gamotkhva/

Endnotes

1 Note on scope: for the purposes of this assessment, "civil society organizations" refers to independent, non-governmental organizations rather than the full international definition of civil society (which can include government-affiliated bodies). Incentivizing GONGOs in the Georgian context specifically means rewarding organizations loyal to the government; government-affiliated organizations are not treated as part of civil society here given their lack of independence.

2 Dubbed the "Russian law" for its resemblance to Russia's 2012 Foreign Agents Law.

3 The cited figures on political prisoners rely on different methodologies. Transparency International's data reflects a verifiable list of currently detained individuals based on Council of Europe criteria, whereas Amnesty International's figure encompasses anyone deprived of liberty through politically motivated proceedings since late 2024, regardless of subsequent release or case closure.

4 Imedi TV is designated on the UK Consolidated Sanctions List (reference RUS3393) for the dissemination of Russian disinformation. UK Office of Financial Sanctions Implementation: https://search-uk-sanctions-list.service.gov.uk/designations/RUS3393/Entity.

11. Annex A – Set of Standards

Cluster A – Institutional and Political Environment and Narratives of CSOs

How do political institutions interact with and portray CSOs?

A1 – Equal treatment

Standard. The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).

A2 – Political recognition as partners

Standard. Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.

A3 – Refrained authorities from smearing

Standard. Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.

A4 – No weaponization of state powers and good governance principles

Standard. The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, emergency measures, or principles such as transparency and fiscal due diligence — selectively or disproportionately to pressure CSOs because of their activities or views.

A5 – Transparent and open public institutions

Standard. Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.

Cluster B – Legal and Financial Framework for CSOs

What formal conditions shape CSO operations and sustainability?

B1 – Free establishment and operation

Standard. Everyone can freely establish, join or participate in a CSO; CSOs determine their own objectives; registration is clear, simple, quick and inexpensive. The state does not interfere in internal governance, and monitoring or reporting is defined by law, proportionate and not onerous.

B2 – CSOs enjoy a safe space and protection from arbitrariness

Standard. CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.

B3 – Liberality of resourcing

Standard. CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.

B4 – Enabling fiscal environment

Standard. CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures, and sanction regimes, are applied to CSOs proportionately and on a risk basis.

B5 – Free expressions of criticism

Standard. CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.

Cluster C – Public Engagement and Perceptions towards the Work of CSOs

How are CSOs perceived, and how do citizens engage with them?

C1 – Citizens' trust

Standard. Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.

C2 – Pluralistic presentation in media

Standard. CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.

C3 – Free engagement

Standard. Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.

C4 – CSOs embedded in communities

Standard. CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.

C5 – Freedom of assembly

Standard. Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.

Cluster D — CSOs as Policy Makers

To what extent do CSOs influence and shape public policy?

D1 – Right to participate in decision-making including in the policy cycle

Standard. Everyone has the right to participate in decision-making, and authorities use mechanisms ensuring meaningful public and CSO participation, with redress for non-compliance, across the whole policy cycle and without discrimination.

D2 – Timely consultations and equal participation

Standard. Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible, so that grassroots and under-resourced CSOs are not excluded due to limited means

D3 – Policies encourage cooperation with CSOs

Standard. State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.

D4 – Free advocacy and watchdogging

Standard. CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited “political” activity.

D5 – Government listens

Standard. Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.

12. Annex B – Key terms

The report uses the following definitions:

Civil Society

- → Associative space (associations, foundations, coalitions, formal and informal)
- → Normative space (values manifested in civil space, civil society as a good society)
- → Deliberative space (public sphere, public debate, narratives and discourses)

Civil Society Organization

The assessment uses the CSO term because the NGO term is a narrower concept than CSO. Therefore, it is suggested that the CSO concept be used to avoid systematically undercounting and thus under-reflecting the range of civic engagement. The broad definition of CSO includes the following dimensions:

- → Formal (legal entities, organizations)
- → Informal (collective, coalitions, initiatives, gatherings, petitions, protests, movements etc.)
- → Characteristics: private-law subjects (formal or informal); self-governing; do not distribute profit to their founders; voluntary but also professional; independent of government — not controlled by any public power or authority or for-profit entity.

The project has been aware of a conceptual debate about what constitutes a CSO, given the hybridization processes that have been salient since the 2000s.

The following types of organizations are excluded from the project's scope: political parties; church and church-based organizations; trade unions.

Civic Space

There are multiple definitions of civic space (CIVICUS, 2020; Hummel et al., 2020; ECF, 2026). They typically cover the following dimensions:

- → Actors (CSOs, civic actors, government/public authorities, citizens, media)
- → Environment (regulations, institutions, fiscal/legal)
- → Relationships among the actors (partnership, dialogue, safe from intimidation)
- → Themes (fundamental freedoms and rights, basic services, etc.)
- → Access to information, resources, and decision-making

13. References

1 CIVICUS (2020) CIVICUS Monitor National Civic Space Ratings. Available at: https://monitor.civicus.org/whatiscivicspace/

2 CIVICUS Monitor (2025) Ratings, Civicus Monitor. Available at: https://monitor.civicus.org/about/how-it-works/ratings/

3 ECF (2026) Civic Space Report 2026. European Civic Forum.

4 ECNL (2019) "CSO Meter. Assessing the civil society environment in the Eastern Partnership countries." European Center for Not-for-Profit Law.

5 ECNL (2021) CSO Meter. Assessing the civil society environment in Eastern Partnership Countries. ECNL Stichting.

6 European Commission (2025) "EU Strategy for Civil Society." Brussels: European Commission.

7 Glopolis (2026) Civic space between formal rules and reality. Report on State of Civic Space in the Czech Republic, Slovakia, Slovenia and Croatia. Glopolis o.p.s.

8 Hummel, S. et al. (2020) Understanding Civil Society in Europe — A Foundation for International Cooperation. Stuttgart: Institut für Auslandbeziehungen & Maecenata Stiftung.

9 MACS (2025) Monitoring Action for Civic Space. European Center for Not-for-Profit Law, European Civic Forum, Bulgarian Center for Not-for-Profit Law, Foreningne Nyt Europa, Le Mouvement associatif, Ökötárs Alapítvány, Stichting Nederlands Helsinki Committee, Ogólnopolska Federacja Organizacji Pozarządowych, Fundația pentru Dezvoltarea Societății Civile.

10 United Nations (2020) "Protection and Promotion of Civic Space." United Nations. (Accessed: June 23, 2026).

