

Legal environment and space of civil society organisations in supporting fundamental rights

Cyprus

January 2021

Contractor: University of Nicosia

Authors: Corina Demetriou, Nicos Trimikliniotis

DISCLAIMER: This document was commissioned under contract as background material for a comparative analysis by the European Union Agency for Fundamental Rights (FRA) for the project 'Fundamental Rights Platform and cooperation with civil society'. The information and views contained in the document do not necessarily reflect the views or the official position of FRA. The document is made publicly available for transparency and information purposes only and does not constitute legal advice or legal opinion.

Contents

1	Five most significant civic space developments in 2020	3
1.1	Freedom of peaceful assembly	3
1.2	Freedom of association.....	3
1.3	Access to information / Civil dialogue / Consultations / Participation in decision-making	5
1.4	Emergency measures (including those related to COVID) / Travel restrictions / Freedom of movement / Visa bans	7
1.5	Financing of civil society work / Taxation / Charitable or public benefit status / Foreign funding.....	8
1.6	Intimidation / Negative narrative / Smear campaigns	9
2	Example of promising practice	10
3	Any other developments	11

1 Five most significant civic space developments in 2020

1.1 Freedom of peaceful assembly

The right to public protests was one of the first rights to be suspended at the outbreak of COVID-19 and continued to be prohibited when most other measures were lifted. Public gatherings, demonstrations, festivals and parades continued to be banned by end of June 2020, when Cyprus lifted most other restriction measures. By end of August, when further relaxations were introduced, the ban on public meetings and demonstrations remained and the police issued several fines to persons participating in civil society protests against the government's immigration policies, state corruption and the lack of proportionality of the measures against the pandemic.¹ During the summer months of 2020, the police started photographing persons attending public protests and identified protest participants to whom the fine of €300 was sent by post.² Although this practice inevitably leads to unrestricted retention of mass data, the DPA did not comment on the legality of this practice and its compatibility with article 6 of the GDPR.

1.2 Freedom of association

In 2017 parliament adopted a new law on the registration and functioning of civil society organisations.³ The new law, subsequently amended three times, brought significant changes to the registration and operation of civil society organisations. These included the following:

- Applications for registration of NGOs are now filed with the district administration in each city, where the officers are not trained and often decide arbitrarily on the supporting documents which must be submitted. This also meant that there is no longer a unified national record of NGOs and locating potential partners for joint projects has become difficult. In spite of the increase in the bureaucracy, e-governance remained at very low levels, as everything has to happen on paper and with physical presence: government forms are only available in pdf and have to be downloaded, filled in by hand and submitted in person.⁴

¹ Trimikliniotis N and Demetriou C (2020), '[Coronavirus COVID-19 outbreak in the EU: Fundamental Rights Implications, Cyprus Country Report](#)', commissioned by the European Union Agency for Fundamental Rights, 3 November 2020.

² Kathimerini (2020), '[Στις 7.500 ευρώ τα πρόστιμα από την πορεία διαμαρτυρίας στο Προεδρικό](#)', 30 October 2020.

³ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017.

⁴ Consultation with [NGO Support Centre](#), 27 January 2021.

- The district administration may request applicants to submit a criminal record of the members of the governing board of the applicant organisation, issued during the last three months from the date of the application.⁵ Although the lawmaker renders this requirement optional upon the district administration, it was in practice interpreted by the district administration officers as being a necessary requirement in all cases. Although an apparently neutral requirement, this provision led to discrimination against Turkish Cypriots who were unable to present a criminal record because they are not resident in the Republic of Cyprus and the documents issued by the Turkish Cypriot administration are not recognised in the Republic of Cyprus. It also excluded persons serving a prison sentence from forming associations promoting their rights, and in fact there is such an organisation which cannot be registered as a result of this development.
- The district administration is under a duty to examine applications for registration within three months from receipt of all documents.⁶ This is not being complied with, as applications are currently pending for over 18 months.⁷
- NGOs with an income over €40.000 must submit audited accounts within seven months from the expiry of the accounting year.⁸ There is no administrative or financial support to NGOs to enable them to fulfil this requirement. Civil society actors believe the threshold to be far too low and adding an excessive burden on organisations with limited resources, no state or other funding and limited technical expertise.⁹
- In August 2020, the Interior Ministry commenced striking off NGOs from the registry for failure to submit amended articles of association within a two months' deadline. This is reported in detail under section 3 below.
- The articles of association, which are to be attached to the application of registration, must state the procedure for calling a general meeting of members, which must take place at least once a year.¹⁰ To amend the articles of association, a majority of three quarters of the members of the organisation must consent to the proposed changes. If it is not possible to secure the presence of three quarters of the members, the district administration can grant its consent for submission of an application to the

⁵ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 6(1).

⁶ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 7(4).

⁷ Consultation with Civil Society Advocates, 28 January 2020.

⁸ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 49.

⁹ Consultation with NGO Support Centre, 27 January 2020.

¹⁰ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 8(f).

court to issue an order permitting the applicant organisation to pass a resolution with at least two fifths of the total of the members.¹¹ Amendments to the articles must be submitted to the district administration within 30 days from the date of the resolution. NGO actors described the procedure for amending the articles as highly bureaucratic and problematic and it should never have been imposed as a precondition for avoiding an automatic strike-off from the NGO register.¹²

A positive development emerging from the new law is that it is now possible to register federations of organisations;¹³ before this, federations had to register as organisations with their members being other organisations.

1.3 Access to information / Civil dialogue / Consultations / Participation in decision-making

There are no guidelines or policies on consultation, which often takes the form of a superficial 'tick-the-box' exercise, where the views and expertise of NGOs is rarely taken on board. Consultation usually takes place at parliamentary level where it is often too late to bring any change of course. There is no fertile ground for watchdog organisations to operate in Cyprus, as there is no funding and the government environment can at times be hostile.¹⁴

The only structured form of consultation takes place within the institution of the 'Parallel parliaments', created under UN75, a UN initiative calling on countries to open dialogue with institutions and civil society on the sustainable development goals.¹⁵ The persons comprising the various committees are selected arbitrarily and randomly. In the Civil Society Committee, some of the members initially selected did not show interest despite having accepted the appointment and were eventually replaced, following recommendations from the existing members. They also participate as individuals rather than as NGO representatives, instead of repeated requests to the Chairman of the House of Representatives to sanction their participation as NGO representatives. Under the presidency of the previous chairman, the committee members were not permitted to contact MPs, the new chairman however sanctioned meetings with parliamentary committees. During its 2019 plenary session, the parallel parliament committee on civil society development put forward a number of proposals including:

¹¹ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 22.

¹² Consultation with Civil Society Advocates, 28 January 2021.

¹³ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 44.

¹⁴ Consultation with NGO Support Centre and [Civil Society Advocates](#), 27-29 January. 2021.

¹⁵ For more details on the institution of parallel parliaments, see the relevant webpage of the House of Representatives [here](#).

- The creation of a national registry of NGOs;
- An action plan for civil society development based on the Council of Europe's guidelines for promotion, development and reinforcement of NGOs in Europe of March 1998, adopted by the Cypriot Council of Ministers but never implemented;¹⁶
- Structured dialogue between the parallel parliament and the executive, to allow for timely intervention at the stage of policy development;
- Funding and administrative support to the parallel parliament;
- The adoption of basic principles on public consultation with civil society, so that consultation is not merely the ticking of a box.

None of the above recommendations materialised and there is widespread disappointment amongst the committee members for the lack of progress on fundamental principles of civil society development.¹⁷

The law on access to information that was adopted in 2017 but entered into force only in December 2020, makes no provision for access to information sought by NGOs. Applications for access to information are submitted by individuals who must also pay a fee, which differs from one governmental authority to another and there are categories of exempted information, access to which will not be provided. The governmental authority is given 30 days to respond by providing access to the information requested or be asking for an extension. The DPA is appointed as the competent mechanism to oversee the implementation of the law and examine complaints.¹⁸ A parliamentarian raised concerns that there are far too many exceptions in the law, the procedure for gaining access will be time consuming and the applicant has no way of knowing whether or not some data was removed from the file by the time permission to access is granted.¹⁹

¹⁶ Republic of Cyprus and Commissioner for volunteerism and NGOs, '[Η οργανωμένη κοινωνία των πολιτών στην Κύπρο](#)'.

¹⁷ Consultation with [Parallel Parliament](#) committee member, 28 January 2021.

¹⁸ Cyprus, Law on the right of access to public sector information of 2017 ([Ο περί του Δικαιώματος Πρόσβασης σε Πληροφορίες του Δημόσιου Τομέα Νόμος του 2017](#)), 184(I)/2017.

¹⁹ Theopemptou, C. (2020), '[Ο περί του Δικαιώματος Πρόσβασης σε Πληροφορίες του Δημόσιου Τομέα Νόμος του 184\(I\)/2017](#)', 22 December 2020.

1.4 Emergency measures (including those related to COVID) / Travel restrictions / Freedom of movement / Visa bans

One of the first measures adopted by the government on 28 February 2020, even before the first COVID-19 case was detected, was to close the checkpoints separating the south of the country, i.e., the Republic of Cyprus, from the north, i.e., the area controlled by the Turkish Cypriot administration.²⁰ The checkpoints remain closed until the date of writing, although at some point it was possible to cross the checkpoints with a negative COVID-19 test. The closure of the checkpoints had a devastating effect on bi-communal civil society, whose work relied entirely on promoting contact and collaboration between the two communities. Bi-communal NGOs could convene on-line but without the possibility of joint activities in the public sphere, their work came to a halt. The educational programs run by the bi-communal group Association for Historical Dialogue,²¹ such as the program Imagine,²² which brought together students from schools on both sides of the divide and was highly praised by the UN's peace keeping force in Cyprus,²³ came to a stop.

NGOs did not get to benefit from the support schemes which the government offered to the private sector as compensation for suspension of their operations during the COVID-19 lockdown. In December 2020 a member of parliament sent a letter to the Labour Minister asking that NGOs who employ personnel be included in the list of state aid recipients whose operations were suspended as a result of the COVID-19 lockdown; the Labour Minister responded negatively, on the ground that NGOs are already recipients of state funding for their activities.²⁴ EU funded programs ran smoothly during the COVID-19 lockdown measures. This was because the European Commission project officers were flexible and ready to approve amendments to project methodology, replacing meetings with digital conferences, without taking away funding for the time being.²⁵

²⁰ Trimikliniotis N and Demetriou C (2020), '[Coronavirus COVID-19 outbreak in the EU: Fundamental Rights Implications, Cyprus Country Report 1](#)', commissioned by the European Union Agency for Fundamental Rights, March 2020.

²¹ For more information, see the NGO's website [here](#).

²² For more information on the Imagine program, see the webpage of the Association for Historical Dialogue [here](#).

²³ UNFICYP (2017), '[Launch of educational programme "Imagine"](#)', 28 November 2017.

²⁴ Letter of Labour Minister to Charalambos Theopemptou, M.P., 20 January 2021.

²⁵ Consultation with NGO Support Centre, 27 January 2020.

1.5 Financing of civil society work / Taxation / Charitable or public benefit status / Foreign funding

In 2018 the law was amended to provide that no remuneration can be paid to any member of the organisation or to any officer of the governing board, unless the articles otherwise provide.²⁶ The amendment is in line with a general perspective widely held in Cyprus that NGO persons ought to be volunteers offering services to vulnerable groups in a charitable fashion. The government funding available for NGOs, apart from being non-transparent, is directed towards service providers for the government, like running shelters for victims or operating refugee camps. As pointed out by NGO actors, when NGOs can get funding to play the role of the state, this raises issues of government control of civil society. The only exception to the governmental practice of not funding advocacy groups is KYSOA, the confederation of disability organisations which also enjoys the status of a social partner; however, its advocacy work is often ignored as its positions are rarely taken on board by policy makers.²⁷

NGOs are deemed not to have any financial activity and therefore cannot register with VAT, as a result of which they pay VAT but are unable to claim it back.²⁸ A series of economic demands put forward by NGOs at the parallel parliament over a number of years in order to facilitate their functioning were declined. These include the following:

- Not all NGOs receive funding and several of them have to operate without any type of funding as their activities do not fall under the priorities of existing funding schemes;
- The timely payment of grants to those NGOs for whom funding was approved continues to be an issue, leading several NGOs to operation problems;
- In the absence of specific and measurable criteria, funding to NGOs from government ministries lacks transparency. The proposal of the parallel parliamentary group on the setting up of a special service to manage state funding to NGOs has not materialised.
- Request for exemption from state fees in the issuance of certificates, for tax exemption granted to social enterprises and to private organisations of public benefit, for discounts in municipal taxes and utility services, requests for discounts schemes from telephone companies, for subsidising the

²⁶ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 18A.

²⁷ Consultation with Civil Society Advocates, 28 January 2021.

²⁸ Consultation with NGO Support Centre, 27 January 2021.

participation of NGO volunteers in state-subsidised training seminars funded, were all rejected.²⁹

In 2018, commercial banks adopted new regulations on the documentation required from NGOs in order to open and maintain accounts with them. The new regulations included a prohibition to pay money to Turkish Cypriots because they could not supply the bank with a utility bill in the Republic of Cyprus. Before 2018, payments could be made to Turkish Cypriot holders of a Republic of Cyprus ID by issuing a cheque which could be deposited by its beneficiary in any Turkish Cypriot bank. This practice stopped from 2018 and now, in addition to a Cypriot ID, the banks demand residence in the Republic of Cyprus. This is complicating the financial management of bi-communal programs as Turkish Cypriots cannot be paid from the project fund for the project work carried out.³⁰

1.6 Intimidation / Negative narrative / Smear campaigns

At the end of December 2019, the Council of Europe's Committee of experts on the evaluation of anti-money laundering measures and the financing of terrorism (Moneyval) issued its fifth-round report on Cyprus.³¹ The report urged the government to pursue more aggressively money laundering from criminal proceeds generated outside of Cyprus, highlighting the risks in the real estate sector which was the choice of investment in order to acquire citizenship under the Cyprus Investment Programme. The report refers only briefly to NGOs urging the government to conduct a risk assessment and adopt a targeted approach in monitoring NGO activity, in order to avoid disrupting or discouraging legitimate NGO activities. The Moneyval report did not state that NGOs were suspect for terrorist funding or for money laundering. Nevertheless, the Interior Minister cited the Moneyval report to claim that there were serious indications that Cypriot NGOs were being used as vehicles for money laundering and for terrorist funding. The Minister's statements were reproduced in a number of media outlets,³² against whom complaints were filed at the Journalistic Ethics Committee in July 2020 for inaccurate reporting that infringed the presumption of innocence; the Committee's decision was pending at the time of writing. Civil society advocates issued a statement criticising the government for focusing on checking all NGOs in a disproportionate manner, which runs contrary to the recommendations of FATF.³³

²⁹ House of Representatives (2019), '[Minutes of the 8th Convention of Civil Society](#)', 6 March 2019.

³⁰ Consultation with Civil Society Advocates, 29 January 2021.

³¹ Council of Europe, Committee of experts on the evaluation of anti-money laundering measures and the financing of terrorism (Moneyval) (2019), '[Anti-money laundering and counter terrorist financing measures: Cyprus, Fifth round mutual evaluation report](#)', December 2019.

³² Vasiliou V. (2020), '[Ο Νουρής δείχνει έμμεσα ΜΚΟ για ξέπλυμα – τρομοκρατία](#)', *Phileleftheros*, 18 July 2020; Tomaras, A. (2020), '[Λουκέτο σε ΜΚΟ που δεν έχουν εγγραφεί στο μητρώο](#)', *Kathimerini*, 30 June 2020; RPN News (2020), '[ΥΠΕΣ: Έλεγχος σε ΜΚΟ για ξέπλυμα και τρομοκρατία- Αμείλικτη η κυβέρνηση](#)', 4 Μαρτίου 2020.

³³ Civil Society Advocates (2020), '[Μερικώς συμμορφώνεται η Δημοκρατία με τις συστάσεις του MoneyVal για τους μη κερδοσκοπικούς οργανισμούς](#)', Press release, 22 February 2020.

In an effort to comply with the Moneyval recommendations for conducting risk assessment of NGOs so as not to disrepute all NGOs with uniform measures, the government hired an international accounting firm to develop guidelines to send questionnaires to NGOs in order to locate those which receive funds from abroad and assess the risk of money laundering or receiving funding from terrorism. The questionnaires prepared by the audit firm however contained more than 200 questions and were sent to more than 5,000 NGOs without any explanation as to what they were about or whether it was compulsory for the NGOs to complete them. Rather than insert a provision that NGOs should fill out the questionnaire only if they received funds from abroad, the NGOs were asked to complete the entire questionnaire without any explanation or help.³⁴

NGO actors reported that Moneyval was used in order to disrepute NGOs and that politicians are generally prone to a rhetoric that NGOs cause national damage, that they are misusing money and that they are frauds. At best, NGOs are described as 'volunteers servicing the community', sidestepping their advocacy role, whilst the Commissioner for Volunteerism has repeatedly stated publicly that there are far too many NGOs for the size of the country.³⁵

2 Example of promising practice

The only development of the reporting period that may qualify as a promising practice is the award by the EEA-Norway Grants of the 'Active Citizens Fund' with a total budget of 1.2 million, to the joint venture of the NGO Support Centre and GrantXpert Consulting, following a competitive public bidding process. This is the first time that a large fund is awarded to a non-governmental entity to fund NGOs in Cyprus and it is expected that it will support fields of NGO activity which are currently underdeveloped because of lack of funding and support from the government. The project will support non-profit NGOs with a focus on the Active Citizens Fund's two main pillars: a) Democracy and Human Rights; and b) Social Justice and Inclusion of Vulnerable Groups.³⁶

³⁴ Consultation with Civil Society Advocates, 29 January 2021.

³⁵ Consultation with NGO Support Centre, 27 January 2021.

³⁶ Cyprus, NGO Support Centre (2020), [Ταμείο Ενεργών Πολιτών - Active Citizens Fund Cyprus 2014-2021](#), 2 September 2020.

3 Any other developments

The process of strike-off of NGOs from the Register

According to a legislative amendment adopted on 27 July 2020, during the last parliamentary session before the summer holidays, and published in the Official Gazette on 17 August 2020, NGOs registered under the previous law are considered as registered under the new law provided they had carried out the necessary adjustments and amendments to their articles of association until 31 December 2019. Those NGOs which did not file any amendments by the end of 2019 were automatically seen as being subject to deletion from the registry, unless they filed an objection and submitted convincing documentation that they should not be struck off.³⁷ On 27 August 2020 a list of 2,826 organisations 'to be dissolved until 26 October' was published on the website of the Interior Ministry³⁸ and in two newspapers; the organisations concerned were not contacted directly. A total of 2,219 of these NGOs were finally struck off two months later;³⁹ most of them did not receive any government funding, some did not receive funding at all and did not have paid personnel.⁴⁰ A further list of 128 NGOs and 77 clubs was published on 14 December, with a deadline until 14 February 2020 to file their objection or be forcibly dissolved.⁴¹ The legal personality of each organisation is automatically lost upon dissolution,⁴² which left NGOs in a limbo situation as regards their bank accounts, their provident funds and other assets.

Prior to the 2020 amendment, NGOs were required to annually file with the registrar updates as regards their membership, boards, general meetings and registered addresses; failure to file them for two consecutive years would trigger a procedure for their dissolution,⁴³ but it was neither a short notice nor an automatic and 'by default' procedure. Before the 2020 legislative amendment, the failure to file amended articles of association carried only a fine of €100 but no forced dissolution.

This change of practice by the Interior Ministry had a devastating effect on many NGOs, which were not made aware of the risk of being struck off. The amendment to the law was adopted literally in the middle of the annual holidays of the vast

³⁷ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 56.

³⁸ Cyprus, Ministry of the Interior, '[Γνωστοποίηση / Επίδοση Αφορά Σωματεία/Ιδρύματα/Λέσχες](#)', 28 August 2020.

³⁹ The list is posted on the website of the Ministry of the Interior, [here](#).

⁴⁰ Consultation with NGO Support Centre, 28 January 2021.

⁴¹ The list is posted on the website of the Ministry of the Interior, [here](#).

⁴² Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 5(2).

⁴³ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 10.

majority of Cypriots and it largely went unnoticed.⁴⁴ For those NGOs who did become aware of the imminent threat for dissolution, the two months' deadline was hardly sufficient to file resolutions, partly because it was in the middle of the holiday season and partly because the physical presence in a general meeting in order to amend articles was prohibited due to COVID-19 measures. The possibility to hold general meetings on-line was only offered to NGOs after the strike-off deadline of October 2020 had passed.⁴⁵

NGO actors expressed discontent over the fact that the state expected NGOs with limited capacity and resources to respond to such tight deadlines with serious repercussions if they fail, whilst the state itself does not comply with its duty to approve registration applications within the three-month period foreseen in the law.⁴⁶ Furthermore, the law provides that NGOs were under a duty to submit amended articles of association only if necessary; it did not require all NGOs to submit amended articles or be struck off. Citing the July 2020 amendment, the Interior Ministry mandated the district authorities to publish the lists of NGOs which until 31/12/2019 had not amended their articles of association, irrespective of whether these articles of association needed changing or not. Some of the NGOs whose names appeared on the lists published by the Ministry of Interior had in fact duly submitted their amended articles of association and yet risked being struck off the registry if they did not file an objection supported by proof that they had filed the necessary documents.⁴⁷

NGOs who were struck off the register through this procedure intend to first file for an administrative appeal, as foreseen by the law,⁴⁸ and then file a recourse to the Administrative Court if their administrative appeal is rejected.⁴⁹ KISA, a migrant support NGO and a vocal critic of the Interior Minister's immigration policy,⁵⁰ was one of the NGOs struck off in this process. After its administrative appeal was rejected by the Interior Minister, KISA filed a recourse at the Administrative Court seeking to annul the Minister's decision for its dissolution; the recourse was pending at the time of writing.⁵¹ KISA and its international networks and partners believe the NGO's strike-off to be motivated by the government's wish to silence its opponents.⁵² The main opposition party further

⁴⁴ Consultation with NGO Support Centre and Civil Society Advocates, 27 and 28 January 2021.

⁴⁵ Cyprus, Ministry of the Interior (2020), '[Διενέργεια της ετήσιας ή έκτακτης Γενικής Συνέλευσης Σωματείων με την μέθοδο της τηλεδιάσκεψης](#)', 11 November 2020.

⁴⁶ Consultation with NGO Support Centre and Civil Society Advocates, 27 and 28 January 2021.

⁴⁷ Consultation with NGO Support Centre and Civil Society Advocates, 27 and 28 January 2021.

⁴⁸ Cyprus, Law on organisations and foundations and other related matters of 2017 ([Ο περί Σωματείων και Ιδρυμάτων και για Άλλα Συναφή Θέματα Νόμος του 2017](#)) N. 104(I)/2017, article 47(5).

⁴⁹ Consultation with Civil Society Advocates, 28 January 2020.

⁵⁰ Simerini (2020), '[Τιμωρία σε μαχαιροφόρους και όσους τους υποκινούν - Δηκτική απάντηση ΥΠΕΣ σε ΚΙΣΑ](#)', 19 November 2020.

⁵¹ KISA (2021), '[KISA appeals to the Court against the violation of its Freedom of Expression by the government](#)', Press release, 10 January 2021.

⁵² KISA (2021), '[Strong solidarity and speedy judicial review the response to the deregistration of KISA by the Ministry of Interior](#)', Press release, 21 January 2021.

expressed objections against the government's action to strike off from the registry NGOs like KISA who are evidently active, merely for failing to comply with some technical requirements of the law.⁵³

As a result of the new law, some NGOs have themselves filed for dissolution because they can no longer respond to new duties, but there was no response from the Interior Ministry as to whether and how this could be done. Some were convened as recently as 2015 and were still active when their names appeared on the Ministry's list as being 'under dissolution'; this caused their bank accounts to be frozen as banks are constantly asking for updated documents and their deposits are at risk of being confiscated. This included several animal rights groups who applied to the NGO Support Centre for assistance, because they could not respond to the new requirements of the law and were concerned about the future of the animals under their care, as they were all volunteers with no funding for administration or auditing of accounts. According to NGO actors, small NGOs will be deleted without the possibility to react and no-one to talk to; few NGOs have the economic and technical capacity to respond to the new requirements of the law, and the new policy of the Interior Ministry will destroy a large section of civil society, creating gaps in support services.⁵⁴

⁵³ Offsite (2020), ['ΓΓ ΑΚΕΛ: Ανησυχία για την μεταναστευτική πολιτική της κυβέρνησης'](#), 21 December 2020.

⁵⁴ Consultation with NGO Support Centre, 27 January 2021.