FRA EUROPEAN UNION AGENCY FOR FUNDAMENTAL RIGHTS

# CIVIC SPACE UPDATE:

# ENABLING CIVIL SOCIETY TO UPHOLD EU VALUES AND STRENGTHEN DEMOCRACY

REPORT

## Contents


**Key findings and FRA opinions** 4
Monitoring civic space developments 4
FRA opinion 1 5
FRA opinion 2 5
Developing national strategies 6
FRA opinion 3 6
Challenges to an enabling legal environment 6
FRA opinion 4 7
FRA opinion 5 7
Protecting civic space actors 8
FRA opinion 6 8
FRA opinion 7 9
Safeguarding access to funding 9
FRA opinion 8 10
Improving the engagement and participation of civil society in law- and policymaking 10
FRA opinion 9 11
FRA opinion 10 11
FRA opinion 11 11

**Introduction** 12

**1. How civil society helps uphold EU values and strengthen democracy** 14

**2. Challenges experienced by civil society organisations** 20
2.1. Legal environment 20
2.2. Protection of civic space actors 25
2.3. Availability of and access to resources 28

**3. Efforts to promote an enabling civic space and protect civil society** 33
3.1. Government strategies 33
3.2. Government targeted measures 35
3.3. Monitoring and reporting by independent public bodies 36
3.4. Civil society initiatives to monitor, protect and empower 37

**4. Framework for the effective participation of civil society organisations in policymaking processes** 40
4.1. Rules and practices to support participation at the national level 41
4.1.1. Examples of frameworks for the participation of civil society organisations in public policymaking 42
4.1.2. Use of technology in consultations 45
4.2. Government consultative and participatory structures to support participation at the national level 46

**Conclusion** 49

**Annex: Methodology** 50

**Acronyms and abbreviations** 53

**Endnotes** 54

**About this publication** 70

# Key findings and FRA opinions

Civil society plays a crucial role in the functioning of a democratic society based on the rule of law and respect for fundamental rights. The contribution of civil society is also a key aspect of the whole-of-society approach that is needed to withstand the democratic, security and other societal challenges Europe currently faces. This has been recognised in numerous EU policy documents, including the EU strategy to strengthen the application of the Charter, the EU strategy for civil society, the European democracy shield and the EU preparedness union strategy.

However, across the EU, civil society actors continue to face a range of challenges that obstruct their ability to work safely and freely for the promotion and protection of fundamental rights and democracy. As European Union Agency for Fundamental Rights (FRA) research shows, this includes hurdles in the legal environment, growing difficulties in securing funding, persistent threats and attacks on organisations and people, and underdeveloped practices in participation and consultation. Since 2018, FRA has documented challenges to civic space. The results of FRA's civic space consultation covering 2024 indicate that 75 % of responding civil society organisations (CSOs) active in the field of fundamental rights faced barriers in conducting human rights activities (18 % often, 55 % sometimes). CSOs perceive a deterioration not only at the national level but also at the EU level. In response to a question on how the conditions at the EU level for CSOs working on human rights have changed in 2024, 22 % of responding organisations said they had greatly deteriorated, 48 % said they had deteriorated, 26 % said they had remained the same and only 3 % said that conditions had improved. CSOs that defend the rights of people in vulnerable situations – such as asylum seekers, religious or ethnic minorities, Roma and or LGBTIQ+ or homeless people – and those working on hate crime, anti-racism, and sexual and reproductive health and rights, report the most in-person threats and attacks.

This report recommends various actions at the EU and national levels to achieve a better monitoring of civic space developments, and support the development of national strategies and measures that prevent challenges to an enabling environment, protect civic space actors, secure access to funding and allow for enhanced participation and engagement in law- and policymaking.

## Monitoring civic space developments

Both the 2023 European Commission recommendation on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes (recommendation on participation) and the 2025 EU strategy for civil society underline the need for monitoring as a basis for preventive and responsive measures. The strategy calls on Member States to monitor developments in civic space using clear indicators and structured reporting frameworks. FRA research demonstrates that this is currently not being done by

Member State authorities, such as ministries or parliaments. There are however a broad range of monitoring activities and reports at national, European and international levels by national human rights institutions (NHRIs), Ombudsman institutions and CSOs. Member States are covered by the different monitoring efforts to varying degrees, and the criteria and indicators used are often not comparable between different monitoring initiatives. This leads to the incomparability of findings, with reports scattered across multiple websites. This makes it difficult for CSOs, other stakeholders and policymakers to access all available and relevant data, and to effectively benefit from the insights, experiences and know-how of diverse national, European and international actors. FRA will cooperate with the European Commission to set up a network of experts on monitoring for knowledge exchange, and an online information hub, which will serve as a one-stop shop for information on existing civic space monitoring initiatives, reports and protection resources.

There is also a need to define the terminology relating to civil society and civic space for effective policy responses and civic space monitoring. Different organisations and policy documents use the terms 'civic space', 'civil society', 'civil society actors' and 'civil society organisations' differently. In particular 'civil society' is used in a broader or more narrow definition, depending on the context. Such definitions, however, are important when rights and obligations are determined, or when the situation and challenges for different actors are being monitored, as well as to target policy measures in response to those challenges. The United Nations guidance note on the protection and promotion of civic space, the Recommendation of the Council of Europe's Committee of Ministers on the protection and promotion of civil society space in Europe and the definitions contained in the Organisation for Economic Co-operation and Development (OECD) Protecting civic space actors global report on civic space are relevant guiding documents for such efforts.

## FRA opinion 1

In all policy and legal contexts, terminology should be clearly defined and used consistently to accurately and effectively address the actors, rights and issues. Member States could use the definitions in the EU strategy for civil society as a basis to align the definitions of 'civic space', 'civil society', and 'civil society organisations' in order to promote a shared understanding of the diverse roles of civil society, including watchdog and advocacy functions; to enhance the comparability of findings; and to avoid gaps in the monitoring and protection of civic space.

## FRA opinion 2

As set out in the recommendation on participation, Member States and candidate countries should monitor developments in civic space using clear indicators and a structured reporting framework. This requires systematic documentation and analysis of developments. To do so effectively, Member States should seek and rely on national data, reports and observations from

NHRIs, Ombudsman institutions, national/multinational CSOs and international organisations. All actors that monitor civic space are invited to contribute to the online information hub to be set up by FRA under the EU strategy for civil society.

## Developing national strategies

This report shows that despite ongoing pressure on civic space and civic space actors, few Member States have developed a dedicated and comprehensive response, such as a strategy or framework for national-level actions to foster a safe and enabling civic space and the effective participation of civil society organisations, as called for by the European Commission in its 2023 recommendation on participation and again in the 2025 EU strategy for civil society. Where some form of strategy exists at the national level, it may be limited in scope, such as to the volunteer sector, or to cooperation between the public administration and non-governmental organisations (NGOs). In other cases, elements of a civil society strategy may be found in more general or thematic strategies. While civic space and civil society may not be considered holistically in one single policy document, a number of Member States have introduced targeted measures supporting an enabling environment for civil society, as detailed in Section 3.1.2.

As part of the 2025 democracy package together with the EU strategy for civil society, the European democracy shield seeks to address the continuing disruptive effect of information disorder on all aspects of democracy. An online survey for the European Parliament in June 2025 found that 66 % of EU residents believe they have encountered disinformation or fake news at least occasionally in a given week. At least every second online user between the ages of 16 and 29 was exposed to hostile messages online, according to a 2024 Eurostat report. In FRA's civic space consultation for 2024, 67 % of responding organisations indicated that they had experienced online verbal threats and attacks.

### FRA opinion 3

Member States are encouraged to develop or update national strategies to support, protect and empower civil society, in line with the Commission's 2023 recommendation on participation and the EU strategy for civil society. As a horizontal concern, such strategies could also include proportionate measures to address challenges to information integrity, such as cooperation with civil society actors, including civil society organisations, to support societal resilience to disinformation.

## Challenges to an enabling legal environment

Data collected by FRA and others indicate instances of interference with the freedoms of

association, peaceful assembly and expression by the state, as well as attacks on civic space actors by third parties. CSOs and others have reported heightened pressures on the freedoms of association, assembly and expression, particularly related to four issues: environmental activism, pride marches and pro-Palestinian protests, and support for migrants. A number of Member States have introduced, proposed or maintained legislation that risks undermining fundamental freedoms based on the stated aims of protecting security, public order or administrative efficiency. Some of these measures – for example, overly restrictive rules on assemblies and protests, including preventive bans, burdensome registration or reporting requirements, and law or official rhetoric that stigmatise CSOs based on their funding or activities – whether intentionally or unintentionally contribute to an environment in which CSOs and activists encounter obstacles in carrying out human rights work.

Whenever Member States act within the scope of EU law, they are obliged to comply with the EU Charter of Fundamental Rights, and this also applies in the law- and policymaking process. In its 2025 report Better Legislation – Human rights impact assessments in lawmaking, the FRA highlights the need for legislators in the EU and in the Member States to assess the impact of policy and legislation on human and fundamental rights before adoption. The report further stresses that an open and inclusive approach to lawmaking allows stakeholders to express concerns and to provide evidence and know-how. This is not just an expression of good governance but also helps prevent legislation that might lead to a violation of human rights. Including all segments of society and representative CSOs in the decision-making process creates a more inclusive, equitable society and has an 'empowering effect' on marginalised groups. The report notes that Member States rarely establish an obligation to consider input from CSOs or affected groups or to provide feedback on such input. CSOs report that feedback on consultations is often inconsistent or lacks any substantial explanations of how the comments submitted by CSOs were taken into consideration. Short deadlines or accelerated procedures in the case of complex legislative proposals further hinder the participation of CSOs.

## FRA opinion 4

Member States must ensure that the freedoms of association, assembly and expression are upheld, and that legislation does not disproportionately restrict civic space. Member States should refrain from taking legal or other measures that unduly hamper the operation of CSOs, including against those that defend the rights of people in vulnerable situations, such as asylum seekers, religious or ethnic minorities, Roma and LGBTIQ+ persons.

## FRA opinion 5

Both the EU institutions and the Member States should conduct human rights impact assessments in the course of policy development and legislative processes to prevent unintended restrictions or collateral effects on civic space and ensure the proportionality of any restrictive

measures. In this context, Member States should ensure that relevant CSOs, including self-representative advocacy organisations of and for people in vulnerable situations, are informed in a timely manner and given enough time to comment on proposed legislation. The impact assessment or the text accompanying the legislative proposal should show how the results of the consultation with independent fundamental rights expert bodies and CSOs were considered.

## Protecting civic space actors

Over the years, FRA's annual civic space consultation has shown that civil society organisations active in the field of fundamental rights have experienced a range of incidents including threats and attacks, with the intensity of experiences varying over time, geography and depending on the topics they work on. In the most recent consultation, from a selection of possible responses, the incidents most frequently reported to FRA were online verbal attacks and threats (67 % of respondents experienced this often or sometimes), negative media reports or campaigns (60 % often or sometimes), politically motivated funding cuts (39 % often or sometimes), excessive administrative controls or audits (36 % often or sometimes) and in-person verbal threats and attacks (36 % often or sometimes). Criminalisation of humanitarian aid (21 % often or sometimes), suspected surveillance by law enforcement (18 % often or sometimes), strategic lawsuits against public participation (SLAPPs) (10 % often or sometimes) and vandalism (10 % often or sometimes) were also perceived as key challenges. One in 10 responding organisations reported that their employees or volunteers had been victims of a physical attack in 2024.

However, FRA's consultation indicates that 61 % of CSOs that experienced incidents did not report them or make a complaint. The most frequent reason indicated for this was that nothing would happen or change (54 %). Of particular concern is the reported impact of these attacks on the organisations and individuals involved. In the latest consultation, 4 out of 5 responding organisations indicated that their staff or volunteers experienced psychological effects such as burnout, depression, anxiety and feelings of vulnerability. More than one half noted financial problems and a discontinuation or reduction of activities because of external pressures.

### FRA opinion 6

Without reporting, victims cannot access justice. Member States should encourage the reporting of serious incidents faced by CSOs and human rights defenders (HRDs), and ensure that they are properly recorded, investigated and prosecuted. Reporting and documentation mechanisms should also enable the identification and analysis of recurring patterns, trends and developments, in order to capture the systemic nature of attacks against civic space actors. To ensure access to justice in practice, appropriate training should be provided to the police and other relevant officials, including public prosecutors and judges, so that they recognise and respond appropriately to incidents experienced by civic space actors. Member States are encouraged to set up structured cooperation between law enforcement agencies and civil society organisations

experiencing repeated serious threats.

### FRA opinion 7

The EU should explore further protection measures for CSOs and HRDs, such as emergency funding for organisations under threat, coordination of available protection measures in Member States, and training and support on administrative, legal and logistical arrangements. Member States should explore how to better ensure the protection of civic space actors, including through training for civic space actors on protection measures, legal assistance, technical and financial support for cybersecurity, psychological assistance and physical protection.

## Safeguarding access to funding

Civil society is an important partner for the EU and its Member States to help ensure that people can enjoy their rights and freedoms as they are enshrined in the EU Charter of Fundamental Rights in practice. Democratic and societal resilience also relies on a strong civil society and civic engagement. However, there is a significant gap between the demand for funding of projects aimed at promoting fundamental rights, democracy and civic engagement, and the available resources.

While there is a growing need for work in the areas of fundamental rights, democracy and the rule of law, related funding has been reduced in recent years. Almost one half (44 %) of respondents to FRA's most recent civic space consultation reported that they had experienced an unexpected reduction, cut or freezing of funding in the 12 months preceding the consultation. Furthermore, FRA's consultations throughout the years have highlighted that short funding cycles create significant administrative burdens for both applicants and donors, and constrain CSOs to short-term projects that are difficult to implement sustainably in view of long-term impact.

At the same time, legislation aimed at ensuring transparency or security has in some cases (partially inadvertently) resulted in various challenges, such as imposing disproportionate obstacles to access to funding for CSOs, stigmatising them as 'foreign agents', or creating a chilling effect for advocacy and activism. For example, rules that exclude political activity or advocacy from eligibility for public funding may become problematic if the definitions of 'political activity', 'advocacy' or 'political advertising' are too broad or vague, and potentially encompass tasks such as public campaigns, policy research or even routine engagement with policymakers. This has led to self-censoring of advocacy activities due to fears of losing funding. In some contexts, CSOs that engage in activities deemed 'political' risk losing their charitable status, with a subsequent loss of tax benefits. CSOs also report (often unintended) consequences of anti-money laundering or counter-terrorism financing laws.

In addition, foreign funding laws can be problematic due to disproportionate fines for receiving

funding from abroad. Twenty-seven percent of CSOs responding to FRA's civil society consultation reported having encountered difficulties often or sometimes due to 'foreign funding' or 'foreign agent' rules during 2024.For instance, one such law in an EU Member State stipulates that organisations that receive foreign funding and fail to comply with reporting and disclosure obligations can face administrative fines from EUR 1 000 to EUR 10 000 and even dissolution.

### FRA opinion 8

EU institutions and the Member States should ensure that the legal and policy environment is conducive to CSOs having access to diverse sources and modalities of funding. Such funding should cover the full range of activities carried out by civil society organisations, including advocacy and watchdog functions and efforts to support democratic and societal resilience. Member States and EU institutions should engage in structured dialogue with relevant stakeholders, including CSOs, financial institutions and oversight bodies, to identify and address obstacles related to disproportionate reporting, due diligence, or access to financial services rules. Rules for access to funding from domestic or foreign sources must be aligned with international standards and EU law relating to non-discrimination and freedom of association.

## Improving the engagement and participation of civil society in law- and policymaking

The European Commission has called on the Member States to promote and facilitate a transparent and inclusive framework for participation that enables civil society actors to participate in policymaking in a meaningful way. This report shows that at the end of 2024, the situation in the Member States varies significantly. Few Member States have legally binding rules for consultation with civil society, and most make use of non-binding guidelines and practices. The scope and effectiveness of both binding and non-binding frameworks is inconsistent. The report identifies a number of promising practices across the Members States that may inspire and help other Member States overcome barriers to meaningful participation, such as a comprehensive approach to all legislation, regardless of whether it is proposed by the government or parliament or by popular initiative, and the application of binding, easily accessible consultation guidelines.

The report shows that throughout the EU and in FRA observer countries, the development of a model of representative democracy that is complemented effectively by a participatory democracy framework remains a work in progress. In the EU strategy for civil society, the Commission notes that there is a need for further data collection and follow-up to the 2023 recommendation on participation. The Commission announced its intention to support capacity-building at the national level for the implementation of the recommendation, in cooperation with the European Economic and Social Committee and FRA.

## FRA opinion 9

To enable the consistent and meaningful participation of civil society organisations in policymaking, Member States should review their legislation and practices, as encouraged by the Commission in the 2023 recommendation on participation. Rules on public participation should provide clear procedures and timelines, and encourage CSOs to submit their views. National law- and policymakers should apply these rules in a consistent, non-discriminatory and transparent manner. Member States should also ensure that CSOs are enabled to participate in the development of national positions on EU-level policies and legislation, so that their perspectives inform both national and EU decision-making processes.

## FRA opinion 10

Public consultations should be widely publicised, and the participation of all members of society promoted, including people in vulnerable situations and their representative organisations. Sufficient time should be given for civil society organisations and other actors to respond to legislative and policy initiatives in a meaningful manner, and authorities should inform participants of the outcomes of consultations.

## FRA opinion 11

The EU and the Member States should examine challenges to the engagement of civil society in practice and on this basis develop training and tools for meaningful participation in policymaking. In this regard, both the EU institutions and the Member States should ensure appropriate processes, budgeting and training for both officials and civil society actors on public participation.

# Introduction

> **Europe is in a fight. … A fight for our values and our democracies.**
>
> *European Commission President Ursula von der Leyen in the 2025 State of the European Union address*

With these stark words, Commission President Ursula Von der Leyen opened the 2025 State of the European Union address [1]. Previously, in her political guidelines for 2024–2029, President von der Leyen spoke of 'an era of profound change' and of a 'world of adversity and uncertainty'. In the face of these challenges, Europe's future 'will depend on a strong democracy and on defending the values that give us the freedoms and rights we cherish' [2].

Faced with increasing geopolitical turmoil and technological disruption, the recently published European democracy shield calls for a whole-of-society approach – including the contribution of civil society actors – to strengthening democracy and democratic resilience. The EU strategy to strengthen the application of the Charter [3], the EU strategy for civil society [4] and EU preparedness union strategy [5] also point to the need for a whole-of-society approach to meet the challenges Europe currently faces.

Yet without a truly enabling environment, civil society organisations cannot fulfil their essential roles in our democracies, including as contributors to good law- and policymaking, watchdogs for rights and catalysts for democratic engagement. Thus, in times of profound change and uncertainty, fostering an enabling environment for civil society is not just a policy imperative, it is essential to safeguarding the future of democracy itself.

Fortunately, Europe faces these challenges from a position of relative strength. Democratic decline and rising authoritarianism are global phenomena, but the baselines from which these are measured are not universal. Despite the challenges to fundamental rights protection, the rule of law and civic space that have been documented in recent years, the EU remains a bastion of democracy. EU Member States score well above the global average in various democracy and rule of law related indexes, such as the annual Democracy Index published by the Economist Intelligence Unit and the *Freedom in the World* report published by Freedom House [6]. According to the 2025 World Justice Project Rule of Law Index that measures human rights, access to justice, corruption and authoritarianism worldwide, 8 out of the top 10 countries ranked by overall score are EU Member States [7].

Within the EU, however, the situation varies considerably between Member States, as is evident by the ranking in the Civicus Monitor. In 2025, 12 EU Member States were assessed as having an open civic space, 10 Member States were categorised as having a narrowed civic space, and five Member States were classified as countries where the civic space is obstructed. This represents a deterioration over the past years, as in 2020, the Civicus Monitor rated 13 EU Member States as open, 13 as narrowed and only one as obstructed [8].

This report is based on data and information collected by FRA's multidisciplinary research network Franet in the 27 Member States and three EU candidate countries, which participate as observers in FRA, i.e. Albania, North Macedonia and Serbia. These data were analysed and complemented through desk research by FRA experts. Finally, the report is informed by FRA's civic space consultation covering 2024 that was conducted online among civil society organisations participating in FRA's Fundamental Rights Platform. The consultation provides insight into the experiences and perceptions of civil society organisations as regards threats to civic space (for details, see Annex).

The report deals with four different yet related dimensions. Chapter 1 of the report highlights the many diverse ways in which civil society contributes to upholding the key EU values of respect for fundamental rights, the rule of law and democracy. It argues that as the EU faces a multitude of dynamic environmental, economic, security, geopolitical and demographic challenges, societal and democratic resilience will be key to safeguarding Europe's future. Despite shifting priorities, it will continue to be of the highest importance for the EU and its Member States to foster an enabling environment for civil society.

As in FRA's previous civic space updates, the report aims to provide policymakers and civil society actors with an updated picture of the current shortcomings to a truly enabling civic space (Chapter 2:).

Focus then shifts to demonstrate how Member States are already aiming to address the challenges to civic space through strategies and targeted measures. The report reveals how NHRIs, Ombudsman institutions and civil society organisations are also contributing to this effort by keeping a watchful eye on civic space and government action, and by taking their own measures to help ensure an enabling environment (Chapter 3:).

In the last chapter (Chapter 4:), the report examines one of the important ways in which civil society contributes to European democracy, which is through participation in law- and policymaking, and identifies the frameworks and structures Member States provide for participation.

Taken together, the different chapters aim to provide a basis for the implementation of the new EU strategy for civil society, with the aim of strengthening the enabling environment and civic space actors to best contribute to this 'fight for our values and our democracies'.

# 1. How civil society helps uphold EU values and strengthen democracy

Under the Treaties, the core values of the EU are respect for fundamental and human rights, the rule of law and democracy [9]. Civil society has an important role to play in upholding these values. In its *2024 Rule of Law Report*, the European Commission reaffirmed that civil society organisations and human rights defenders foster the rule of law in practice [10]. In the 2022 report *Europe's Civil Society: Still under pressure*, FRA examined the many ways in which civil society contributes to a rule of law culture [11]. As concerns have expanded from the state of the rule of law in Europe to the state of European democracy and democracy worldwide, attention has also focused on the ways in which a vibrant civil society contributes to the strength of democracy and its resilience.

It is important to note that what exactly is meant by 'civil society' can, however, differ, as different organisations and policy documents use the term with various meanings (see What is civil society?). Within this report, the term is used in a broad sense, with the relevant actors, such as civil society organisations, specified where a narrowing of the concept is merited.

### Definition – What is civil society?

International and EU policy documents use the term 'civil society' differently, and thus may refer to only some actors that fall into this category. Some examples include the following.

- In the Council of Europe's 'Guidelines for civil participation in political decision making', civil society is recognised as 'the ensemble of individuals and organised, less organised and informal groups through which they contribute to society or express their views and opinions, including when raising issues regarding human rights violations, corruption and other misconduct or expressing critical comments. Such organised or less organised groups may include professional and grassroots organisations, universities and research centres, religious and non-denominational organisations and human rights defenders.'

*Source:* Council of Europe, 'Guidelines for civil participation in political decision making', CM(2017)83 final of 27 September 2017.

- For the purposes of the EU strategy for civil society, the term civil society is generally used synonymously with 'civil society organisations', which are defined as 'all non-State, not-for-profit, independent, non-partisan and non-violent organisations, through which people pursue and defend shared

objectives and ideals.'

*Source:* Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025.

- According to its founding regulation, FRA cooperation with civil society is built around the Fundamental Rights Platform, which is composed of 'non-governmental organisations dealing with human rights, trade unions and employer's organisations, relevant social and professional organisations, churches, religious, philosophical and non-confessional organisations, universities and other qualified experts of European and international bodies and organisations.'

*Source:* Council Regulation (EC) No 168/2007 of 15 February 2007 establishing a European Agency for Fundamental Rights (OJ L 53 22.2.2007, p. 1, ELI: http://data.europa.eu/eli/reg/2007/168/2022-04-27) as amended by Council Regulation (EU) 2022/555 of 5 April 2022 amending Regulation (EC) No 168/2007 establishing a European Union Agency for Fundamental Rights (OJ L 108, 7.4.2022, p. 1, ELI: http://data.europa.eu/eli/reg/2022/555/oj).

A further consideration is that not all actors within civil society share or promote the values that underpin the EU, and some may even act to attack or undermine them. Similarly with the EU strategy for civil society, this report covers accountable, independent and transparent CSOs that function according to respect for human dignity, democracy, equality, the rule of law and fundamental rights and freedoms [12].

Additionally, there is an overlap between different civil society actors and the concept of human rights defenders (see What are human rights defenders?).

## Definition – What are human rights defenders?

The UN declaration on human rights defenders, although not legally binding, contains principles and rights that are based on human rights standards enshrined in legally binding international instruments. HRD is a term used to describe people who, individually or with others, act to promote or protect human rights in a peaceful manner. This can include, for example, human rights civil society activists and formal civil society organisations, journalists, lawyers, judges, trade unionists, academics and artists.

*Sources:* UN General Assembly, Declaration on the right and responsibility of individuals, groups and organs of society to promote and protect universally recognized human rights and fundamental freedoms, 8 March 1999; UN General

Assembly, 'Report of the Special Rapporteur on the situation of human rights defenders', 19 July 2017; UN Office of the High Commissioner for Human Rights (OHCHR), 'About human rights defenders', UN OHCHR website.

It is also important to note that not all CSOs are HRDs, as CSOs may be involved in many different areas of life. Depending on their purpose and mandate, they may not fulfil all roles detailed below, and may face different challenges based on how these roles are perceived or affect public authorities and others in society.

## Definition – What is civic space?

'Civic space is the environment that enables people and groups – or "civic space actors" – to participate meaningfully in the political, economic, social and cultural life in their societies.
[…]
A vibrant civic space requires an open, secure and safe environment that is free from all acts of intimidation, harassment and reprisals, whether online or offline. Any restrictions on such a space must comply with international human rights law'.

*Source:* UN OHCHR, 'United Nations guidance note on the protection and promotion of civic space', September 2020.

## Definition – What is democratic resilience?

Within the Council of Europe, recent efforts to define the parameters for the Reykjavík Principles for Democracy viewed democratic resilience as resistance against actual or potential risks or threats to democracy and 'the ability of a political system to react to challenges so as to maintain its democratic features'.

*Source:* Council of Europe Steering Committee on Democracy, Draft parameters for the application and implementation of the Reykjavík Principles for Democracy (not yet adopted).

The Council of Europe's new democratic pact for Europe notes the high stakes in question: the resilience of our democratic institutions, freedoms and values is democratic security, without which there can be no lasting peace [13].

*Source:* Council of Europe, Towards a New Democratic Pact for Europe – Report

of the Secretary General of the Council of Europe 2025, Council of European Publications, Strasbourg, May 2025.

At the EU level, the concept of democratic resilience is widely used but has not been defined. 'Democratic resilience' is sometimes used as an umbrella term for more specific concepts such as societal resilience, electoral resilience, media resilience, cyber resilience and economic resilience [14].

The EU strategy for civil society complements the European democracy shield and will also contribute to reinforcing democratic participation, resilience and public trust. In these and other policy documents, democratic resilience has been strongly linked to meaningful and inclusive citizen engagement, a vibrant civil society, support for a free and independent media and safeguarding electoral processes from all forms of foreign interference, including foreign information manipulation and interference (FIMI).

*Sources:* Council of the European Union: General Secretariat of the Council, 'Presidency conclusions on strengthening EU democratic resilience', 9463/25, Brussels, 27 May 2025; Joint Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – European democracy shield: Empowering strong and resilient democracies, JOIN(2025) 791 final of 12 November 2025.

**Civil society as an essential component of a functioning democracy and catalyst for public engagement**

As recognised by the European Court of Human Rights, 'where society functions in a healthy manner, the participation of citizens in the democratic process is to a large extent achieved through belonging to associations in which they may integrate with each other and pursue common objectives' [15]. CSOs serve as catalysts for civic engagement and active participation in public affairs, providing opportunities for meaningful engagement and nurturing a 'vibrant ecosystem of civic participation essential for the functioning of democracy' [16]. Recent efforts to define democratic principles by the Council of Europe and the European Law Institute have reaffirmed that civil society is a prerequisite for a functioning European democracy [17].

**Civil society as a key channel for good lawmaking and building trust in public authorities**

As recognised in the 2023 defence of democracy communication, an increasingly important way in which civil society engages in the democratic process is through its contribution to law- and policymaking (see Chapter 4). Today's model of democracy goes beyond mere representation of citizens by members of legislative bodies and entails the understanding that public authorities should also consult directly with all stakeholders who may be affected by any policy or law. In line with the understanding of open government and good governance, civil society actors contribute

through their expertise, including in fundamental rights and the rule of law. They advocate for the rights of minorities and other groups that otherwise might not have a strong political voice.

Civil society participation is part of good lawmaking, which also has a positive effect on trust between civil society and public authorities, increasing trust in the democratic institutions and processes that underlie our societies [18]. Trust in public authorities is affected by a complex interplay of factors, some of which are directly linked to citizen engagement and participation. A sense of political agency, that is, the ability to influence political decisions and processes, and openness are crucial to the level of trust that people have in national governments. Ensuring that all people's voices are heard and using better, transparent and verifiable evidence in decision making are key to improving trust [19].

**Civil society as a watchdog**

The role of CSOs as a watchdog for fundamental rights and the rule of law is also one of a watchdog for democracy. This is key for fighting corruption and securing accountability, and particularly important with the attention of governments increasingly focusing on security and defence. This role is highly valued by citizens. In the 2025 *Special Eurobarometer 568*, 42 % of the respondents considered exposing corruption as civil society's most significant area of work, followed by defending individual rights (41 %), delivering services (39 %) and monitoring government action (28 %) [20]. For example, together with parliament, the courts and other independent oversight bodies, CSOs can help keep an eye on such fundamental issues of democracy as the prevention of abuse and misuse of surveillance technologies.

**Civil society as part of the whole-of-society approach to resilience**

Due to the increasingly volatile geopolitical landscape, civil society has also been recognised as an important factor in the whole-of-society approach that is needed for preparedness and societal resilience [21]. The level of trust in public authorities and in democratic institutions is deemed key to citizens' contribution and commitment to democratic resilience [22]. Democratic resilience for its part is seen as vital for European security and thus ultimately for the future of the EU and its values as well [23].

**Civil society combating disinformation and other forms of information disorder**

The recent *Special Eurobarometer 568* reveals that Europeans consider the most serious challenges to democracy in the European Union to be growing public distrust towards democratic institutions and processes, followed closely by foreign information manipulation, interference and disinformation, including in the context of elections, lack of transparency with regard to whether political content online is promoted through new technologies like artificial intelligence (AI), and declining opportunities for citizens to access information from independent and trustworthy media sources [24]. This increases and underlines the need for a strong, pluralistic and independent media, but also for knowledgeable and critical consumers of information. Media literacy and critical thinking education can empower and enable citizens to hold power to account, and also to form opinions based on reliable information, in particular in the context of political

debate and elections. The European Commission in its 2023 communication on defence of democracy includes the fight against disinformation as an important part of civil society's contribution to combating challenges to democracy. More recently, in the context of general societal resilience and preparedness, it has been noted that CSOs can contribute through awareness-raising, fact-checking and working in cooperation with governments, media service providers and internet platforms. Together they can work to develop the digital and media literacy skills needed to combat disinformation and other forms of information manipulation [25] . The European democracy shield initiative calls for the contribution of civil society in a new European Network of Fact-checkers, the rapid response system to identify FIMI for elections, the Stakeholder Platform of the new European Centre for Democratic Resilience and in efforts to improve media and digital literacy [26] .

# 2. Challenges experienced by civil society organisations

Pressure on civic space is one of the many challenges to democracy that Europe currently faces. An enabling civic space allows civic space actors – both organisations and individuals – 'to participate meaningfully in the political, economic, social and cultural life of their societies' [27]. FRA research focuses on four aspects of civic space: the legal environment, availability of and access to resources, meaningful participation by CSOs in law- and policymaking, and protection of civic space actors. FRA consults CSOs active in the field of fundamental rights annually on their experiences in these areas and the challenges they face in their work. This chapter is based on the latest consultation results and desk research, and focuses on the legal environment, resources and protection. Participation is addressed in Chapter 4 of this report.

## 2.1. Legal environment

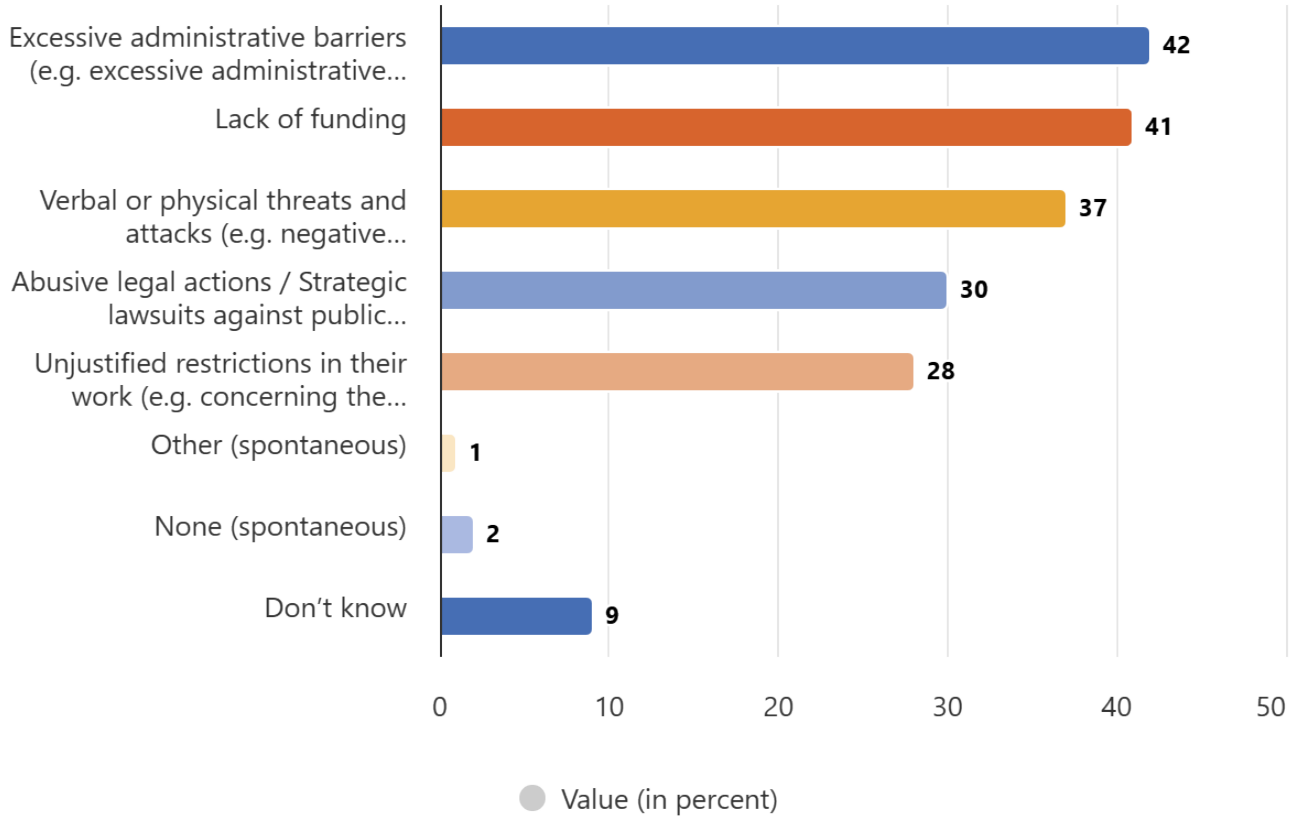
A conducive legal environment for the effective functioning of civic space actors requires a strong legal framework that respects, protects and promotes the freedoms of association, peaceful assembly, expression and information in conformity with global international human rights law, the European Convention on Human Rights (ECHR) and the EU Charter of Fundamental Rights (the Charter) [28]. Importantly, the Court of Justice of the European Union (CJEU) has confirmed that CSOs 'must be able to pursue [their] activities and operate without unjustified interference by the State' [29], while the European Court of Human Rights (ECtHR) has held that Member States also have a duty to guarantee the proper functioning of associations and secure the freedom of association [30]. It is also important to ensure that laws and policies do not have intentional or unintentional negative collateral effects on civic space and civic space actors.

Impact assessments can help ensure that proposed laws and policies are designed and implemented in ways that respect and protect fundamental rights, as is demonstrated in a recent FRA report on the role of human rights impact assessments in lawmaking in the EU [31]. However, the report also reveals that such assessments are often either not carried out or only carried out superficially. Moreover, the input of CSOs is often limited due to short deadlines or accelerated procedures in the case of complex legislative proposals.

Despite these standards, pressures relating to the legal environment persist. In response to the question of how often their organisations had encountered difficulties in conducting their work due to different aspects of the legal environment, CSOs active in the field of fundamental rights that participated in the FRA civic space consultation covering 2024 reported issues with access to information, legislation on civil dialogue, foreign funding legislation, and (often unintended) collateral effects of legislation in other areas, such as data protection, transparency and lobbying, and taxation and charitable status (See Figure 2) [32].

In the recent *Special Eurobarometer 568* on protecting and promoting democracy, respondents were asked for their views on the most significant difficulties faced by CSOs in their country. Across the EU, 42 % of respondents indicated excessive administrative barriers. Nearly one third (30 %) noted abusive legal actions while a further 28 % mentioned unjustified restrictions on the work of CSOs, such as barriers to freedom of association or access to information (See Figure 1).

**Figure 1 – Significant difficulties faced by CSOs across the EU (%)**

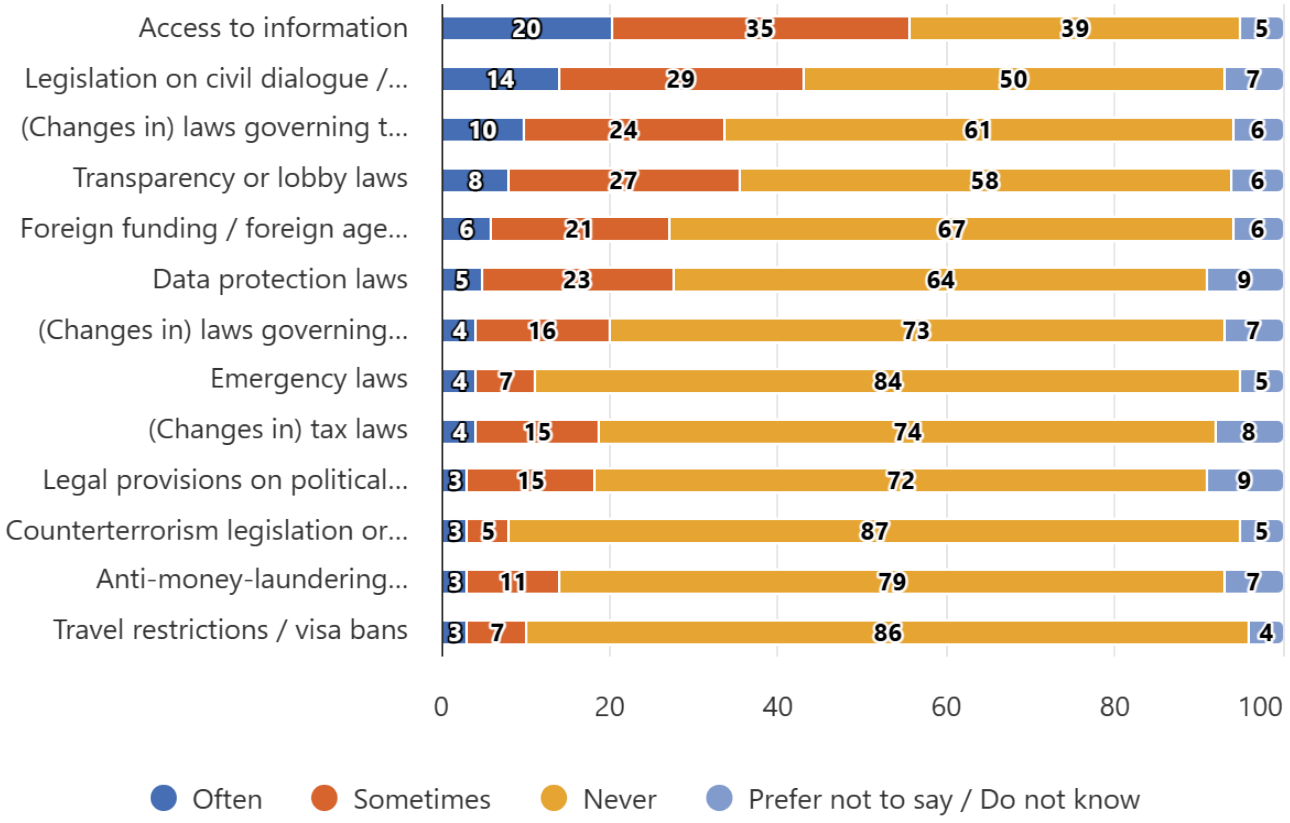



Horizontal bar chart showing the most significant difficulties faced by CSOs across all 27 EU Member States. 42 % of respondents identify excessive administrative barriers as the most significant difficulty, closely followed by lack of funding at 41 %. Verbal or physical threats and attacks are mentioned by 37 %, while 30 % point to abusive legal actions or SLAPPs. Unjustified restrictions in their work are reported by 28 % of respondents. A further 1 % indicate other difficulties, while 2 % state that they face none.

Note: Visual presentation adapted by the authors.
*Source:* European Commission: Directorate-General for Justice and Consumers, Special Eurobarometer 568 – Protecting and promoting democracy – Report, Publications Office of the European Union, Luxembourg, 25 November 2025.

*Question*: 'In your view, what are the most significant difficulties faced by civil society organisations in (our country)? (Max. 3 Answers) (EU27)'

**Figure 2 – FRA consultation – Challenges across key aspects of the legal environment in 2024 (%)**




Horizontal stacked bar chart showing challenges to civic space related to the legal environment. CSOs report facing difficulties often or sometimes in relation to access to information (55 %), legislation on civil dialogue or consultation (43 %), and changes in laws governing the funding of CSOs (34 %). By contrast, travel restrictions or visa bans are least frequently reported, with 10 % of CSOs indicating they face such constraints often or sometimes.

*Source:* FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025.

*Question*: 'In the past 12 months, how often has your organisation encountered difficulties in conducting its work due to the legal environment in the following areas?' (n = 237–269)

In relation to the freedom of assembly and freedom of expression, in recent years a number of issues have been particularly visible in the public debate. One such issue has been the use of facial recognition technology and other forms of remote biometric identification for law enforcement purposes. An upcoming FRA report will demonstrate the public's concerns about the use of such measures by law enforcement, including due to the potential chilling effects of such technology if deployed during protests. Many discussions have also related more specifically to environmental activism, pro-Palestinian demonstrations and pride marches.

Within the legal framework, as a core principle, international and European human rights standards on the right of peaceful assembly emphasise the presumption in favour of (peaceful) assemblies, which means that public authorities must generally allow assemblies unless there are convincing reasons not to. The concept of 'peaceful' is central to this right, and protests that have violent intentions may be held to fall outside of its protection [33] . Under the ECHR, any restriction of this right must be prescribed by law and be necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others [34] . States also have

so-called ‘positive obligations’ under the freedom of peaceful assembly, requiring them to both proactively protect those exercising this right and to facilitate its exercise in ways that make it possible for participants to safely assemble and achieve their objectives [35] . To navigate these rights and obligations, *Guidelines on Freedom of Peaceful Assembly* have been published by the European Commission for Democracy through Law (Venice Commission) and the Organization for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights (ODIHR) [36] .

Similarly, the freedom of expression is considered to be an essential foundation of a democratic society, and therefore also applies to those ideas and information that offend, shock or disturb the state or any sector of the population [37] . Article 10 of the ECHR further stipulates that ‘The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.’

In the case of environmental protests, new methods of protest such as wilfully damaging monuments or works of art, or intentionally blocking public roads or causing other disruptions through ‘civil disobedience’ are testing the boundaries between permissible peaceful assembly and permissible restrictions, including those that may be required of public authorities to meet their positive obligations to protect the safety of those who assemble and the rights and freedoms of others. For example, in a recent judgment, the ECtHR held that in the absence of violent intent, blocking a motorway as part of a strike falls within the scope of freedom of assembly [38] . Previously, however, the ECtHR has also held that restrictions to prevent disorder and maintain the orderly circulation of traffic may serve the legitimate aim of protection of the rights of others [39] . The UN Special Rapporteur on Environmental Defenders under the Aarhus Convention has underlined that Parties to the Aarhus Convention have a binding obligation under Article 3(8) to ‘ensure that persons exercising their rights in conformity with the Convention are not penalised, persecuted or harassed in any way for their involvement’ [40] , and in October 2025 issued the *Guidelines on the right to peaceful environmental protest and civil disobedience* [41] .

CSOs, the UN Special Rapporteur on Environmental Defenders under the Aarhus Convention and media outlets have repeatedly raised the alarm about the increasing criminalisation of environmental protests, which was considered overly harsh and disproportionate to any harm caused. They argue that this unlawfully interferes with the freedoms of association, expression and assembly, including through the imposition of disproportionate penalties, which can lead to a chilling effect that deters people from exercising their right to protest due to fear of arrest or prosecution, and generally undermines climate activism [42] . Reported pressures include, for example, preventive detention ahead of protests [43] , authorities issuing blanket bans on protests in certain areas, such as a ban on all climate-related protests blocking ‘key roads’ and other areas [44] , organisers being charged with forming a criminal organisation [45] and attempts at dissolving climate organisations on the grounds of ‘eco-terrorism’ or ‘eco-vandalism’ [46] . Several

of these incidents have been referred to the courts, which will decide whether violations have occurred in the particular case. The ECtHR has, for example, found that subject to proportionality, states can impose a limitation on holding a demonstration in a given place for public security reasons [47] . In a 2024 judgment, the Strasbourg Court accepted the finding of the French courts in a case related to the '*gilets jaune*s' that an order banning demonstrations in a defined area on a specific day had been justified [48] . In relation to criminal sanctions, the ECtHR has held that peaceful demonstration should not, in principle, be subject to the threat of a criminal sanction, and examines with particular scrutiny any case involving the imposition of a prison sentence for non-violent conduct [49] .

Similar patterns are apparent in relation to pro-Palestinian demonstrations, with reports from CSOs ranging from blanket bans on protests to the alleged use of excessive force by authorities, including the use of pepper spray, kettling and the deployment of police dogs [50] . In this context, the Council of Europe's Commissioner for Human Rights raised concerns about the curtailing of the use of Arab language and cultural symbols during Gaza protests, the alleged use of force against protestors, and intrusive surveillance [51] .

These incidents have been taking place in a volatile geopolitical environment and entail complex issues. State authorities must ensure public order and security, and protection against hate speech, including certain forms of racism and xenophobia which, under EU law, must be punishable under criminal law [52] . For example, at the same time, the German Federal Association of Research and Information Centres on Anti-Semitism (Bundesverband der Recherche- und Informationsstellen Antisemitismus) has documented that in Germany, between 7 October 2023 and the end of 2024, an average of five gatherings with antisemitic content took place per day, whereas prior to 7 October, the average had been just under one per day. In 89 % of these gatherings, Israel-related antisemitism was documented – often accompanied by other forms of antisemitism. These included calls for the destruction of Israel, advocacy of violence against Jews, open support for terrorism and the relativisation of the Shoah [53] .

There have also been protests in Serbia triggered by the collapse of a canopy at the Novi Sad railway station, with protesters demanding accountability for the injuries and deaths, and greater rule of law protections. In 2025, the Civicus Monitor downgraded Serbia from 'obstructed' to 'repressed' [54] .

The freedoms of assembly and of expression of LGBTIQ+ demonstrators has also come under increased pressure in at least two EU Member States [55] . This has included the banning of pride marches in various locations. In Hungary, this was based on a law amending certain laws for the protection of children, which has been challenged in the Court of Justice of the European Union [56] . Another concern in Hungary was the announced use of facial recognition software to identify participants of demonstrations [57] . There were instances when demonstrators marched peacefully despite such bans [58] . Previously, the ECtHR has found that a ban on a pride march violated the right to freedom of peaceful assembly and reiterated that restrictions on pride events must be necessary and proportionate to a legitimate aim, such as public order. The ECtHR further held that repeated bans on pride marches did not meet the 'pressing social need' test, and that the

ban therefore violated Article 11 (freedom of peaceful assembly) [59]. In another case, the Court held that a restriction on LGBTIQ+ demonstrations did not serve to advance the alleged aim of the 'protection of morals' but rather reinforced stigma and prejudice and encouraged homophobia [60]. In fact, banning public pride events has repeatedly been found by the ECtHR not to be necessary in a democratic society and therefore contrary to Article 11 [61].

Respect for the freedom of association remains a concern in parts of the EU, particularly regarding the registration and deregistration of CSOs in at least six EU Member States, where complex, burdensome or restrictive registration procedures are making it difficult for organisations to gain or retain legal status [62]. These bureaucratic hurdles limit their ability to operate effectively but also constrain their access to funding and other forms of support, as similar restrictive procedures outside the EU have also shown.

Similarly with the freedom of assembly, any restriction of the right of association must be prescribed by law and be necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others.

For example, certain registration requirements for organisations seeking to provide services in refugee camps have been described by CSOs as burdensome, time-consuming and administratively opaque, creating practical obstacles to delivering aid and protection [63]. In response to such concerns, in Greece, the Ministry of Migration and Asylum is currently working on the revision of the legal framework governing registration in the NGO registry and on the reduction of the required documents, with the aim of simplifying the registration procedure [64]. Other reports refer to deregistration of organisations based on technicalities, such as failing to submit audited accounts on time or to convene a general assembly during the COVID-19 pandemic within the required timeframe. In one such case, an organisation challenged deregistration and won its case in the Supreme Constitutional Court [65]. While it was ultimately vindicated, the organisation was deregistered for five years, leading to a range of challenges for its work.

Pressure also continues to be placed on CSOs through criminal prosecution. For instance, several NGO search and rescue crews were accused of 'aiding and abetting illegal immigration' or colluding with smugglers, effectively criminalising humanitarian rescue. After multi-year investigations and court proceedings, all of the charges were either dismissed or the crews were acquitted by the courts [66]. Similarly, several aid workers and volunteers working in the Aegean Sea faced serious charges such as espionage, membership of a criminal organisation and assisting illegal entry. In two prominent cases, prosecutors recommended dismissal and groups of aid workers were acquitted by the courts due to lack of evidence, procedural flaws, the vague nature of the accusations, and because the courts held that the humanitarian actions of the defendants did not amount to criminal conduct [67].

## 2.2. Protection of civic space actors

International human rights law guarantees the rights to life, liberty and security of person, the right to participate in public affairs, and the right of everyone to enjoy the freedoms of expression, assembly and association. In Europe, these rights are enshrined in the ECHR as interpreted by the European Court of Human Rights, and in the EU Charter of Fundamental Rights and its related CJEU case-law, to the extent the Charter is applicable [68]. The case-law of both courts has recognised the obligation of the state to not only abstain from undue interference, but also to provide an environment where CSOs can effectively enjoy their rights and freedoms [69]. As an interesting and potentially important innovation, in a recent judgment, the ECtHR expanded the interpretation of discrimination by association, and considered two applicants who were HRDs assisting migrants and refugees to be victims of 'threats, incitement to violence and hate speech, motivated by intolerance and prejudice and directed against the applicants because of their association, through their professional activities, with the groups of people for whose rights they worked' [70].

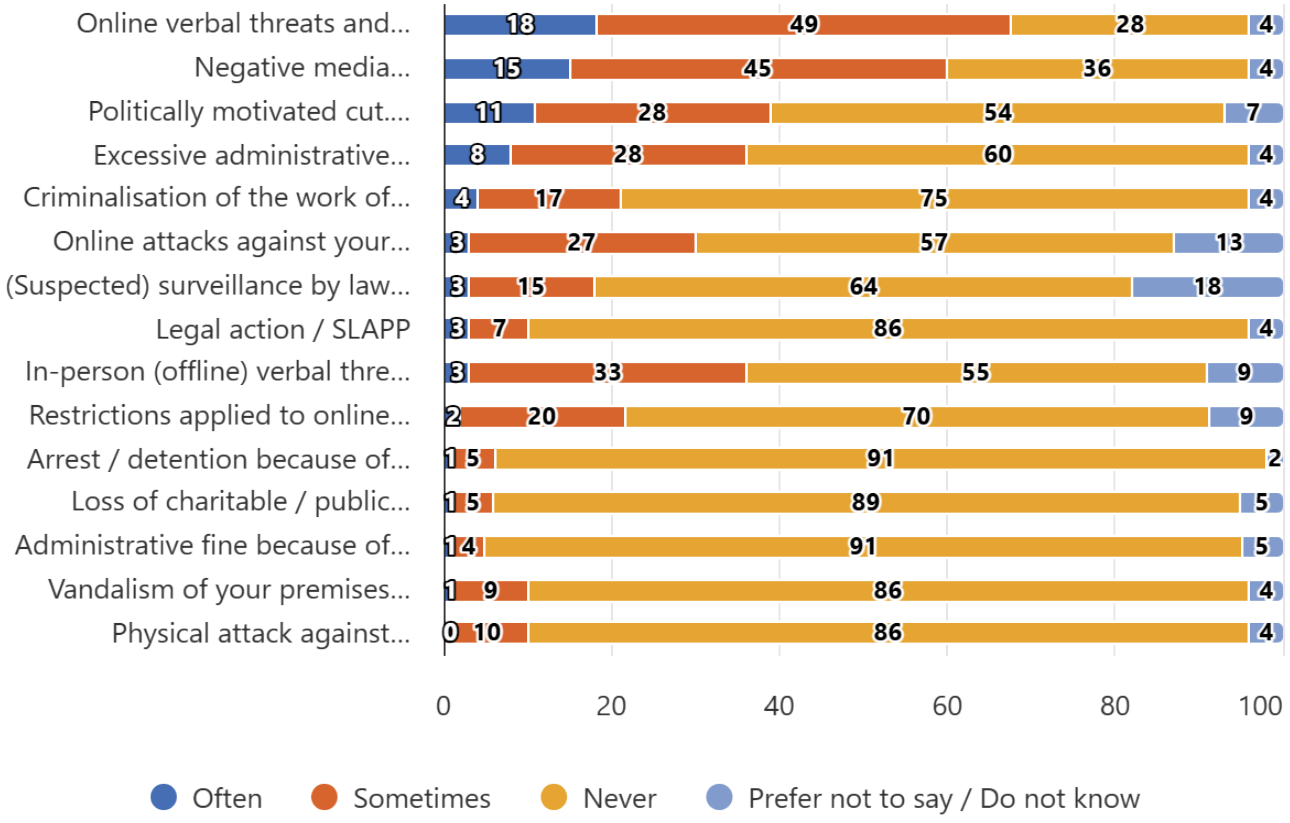
The Council of the European Union recently invited the Member States to '[p]rotect CSOs and human rights defenders from, inter alia, threats, attacks, persecution of critical voices and smear campaigns targeting organisations, staff and volunteers by active means, such as by taking targeted actions to address these issues, by establishing monitoring mechanisms to prevent such threats, by ensuring the prompt identification, reporting, investigation and follow-up on such incidents, and by putting in place dedicated support services for civil society actors' [71].

One of the three pillars of the recently adopted EU strategy for civil society centres on protection. This includes both safeguarding civic space as such, and also protecting organisations and HRDs. The strategy refers to the need to monitor civic space as a basis for preventive and reactive measures [72]. Several EU instruments directly contribute to the protection of CSOs in the EU, including notably the Anti-SLAPP Directive [73], which provides for procedural safeguards to protect persons who engage in public participation, including CSOs, from manifestly unfounded claims or abusive court proceedings, and the 2023 recommendation on participation. Under its citizen, equality, rights and values programme, the Commission also supports several protection measures that are carried out by CSO-led initiatives [74]. The strategy also refers to the need to explore further protection measures at the national level, such as urgent assistance to organisations under threat, coordination of available protection measures in Member States, and training and support on administrative, legal and logistical arrangements [75].

Evidence gathered by FRA and others indicates that organisations working in the area of fundamental and human rights, along with individual human rights defenders and activists, continue to face threats and attacks in the EU, from both private and public actors [76]. The incidents most frequently reported in FRA's consultations over the years are 'online verbal attacks and threats', 'negative media reports or campaigns', 'politically motivated funding cuts' and 'excessive administrative controls or audits'. Other challenges selected by respondents from a list of issues include criminalisation of humanitarian activities, suspected unlawful surveillance by law enforcement, alleged misuse of civil and administrative litigation in the form of SLAPPs [77], and vandalism and physical attacks [78]. The type and intensity of experiences vary over time and among Member States (Figure 3). Moreover, they vary according to the respondent's main area(s)

of activity. This may reflect differences in the nature of organisations' work, their level of public visibility and their interaction with other stakeholders. For example, SLAPPs are experienced predominantly by the responding organisations that work on anti-corruption and transparency, digital rights, freedom of expression, environmental rights and minority rights. Suspected surveillance is reported by CSOs working on freedom of speech/expression, anti-corruption and transparency, civic space, digital rights, democracy and the rule of law, access to justice, and Roma and Travellers. The most in-person threats and attacks are reported by CSOs working on Roma and Travellers, minority rights, LGBTIQ+ rights, hate crime, integration and inclusion of migrants, anti-racism and non-discrimination, and homeless people [79] .

**Figure 3 – FRA consultation – Negative experiences by CSOs and their staff/volunteers in the EU in 2024 (%)**




Horizontal stacked bar chart showing challenges to civic space related to negative experiences faced by CSOs and their staff or volunteers. Online verbal threats or attacks are the most frequently reported issue, with 18 % of CSOs reporting they face them often and 49 % sometimes, while 33 % of CSOs report sometimes facing in-person (offline) verbal threats or attacks. 60 % report often or sometimes experiencing negative media reports or campaigns. Physical attacks against employees or volunteers are least frequently reported, with no CSOs reporting they face them often and around 10 % reporting they face them sometimes.

*Source:* FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025.

*Question*: 'In the past 12 months, how often did you or any of your employees/volunteers face the following?' ( *n* = 92–310)

Particularly concerning are the reported consequences of these attacks. Over one half of the responding organisations indicated that the experiences had a medium or high impact on their

staff or volunteers in the form of psychological effects such as burnout, depression, anxiety and feelings of vulnerability, 38 % indicated financial problems, and 34 % reported discontinued or reduced activities. Moreover, 22 % indicated that staff or volunteers had left the organisation, and 15 % reported post-traumatic stress disorder (PTSD) [80].

However, FRA's consultation indicates that 61 % of CSOs that experienced incidents did not report them or make a complaint to the relevant body. While some incidents may constitute criminal offences and fall within the remit of law enforcement authorities, others – such as negative media campaigns, politically motivated funding cuts, or excessive administrative controls – may instead be addressed through judicial, political or advocacy channels. Those consultation respondents who did make a complaint or reported incidents addressed the media most frequently (46 %), followed by the police (41 %), legal services or lawyers (28 %), the European Commission or European Parliament (23 %), and other civil society or victim support organisations (19 %) [81].

The most frequent reasons indicated for not reporting were that nothing would happen or change, that the incident was minor and not worth reporting, or that they dealt with the problem themselves. A small number of respondents also indicated a fear of reprisals or discontinuation of funding. More than one half of the respondents who had reported threats or attacks to the police were dissatisfied with how the report was handled [82].

Due to the wide range of pressures, threats and attacks experienced, it is important to adopt a model of 'holistic' protection to address the situation [83]. When asked which protection measures they deem most important, responding organisations indicated legal advice or legal aid (to address legal challenges, criminalisation, restrictive laws or SLAPPs), coalition building (to strengthen alliances, share resources and knowledge, amplify voices and provide mutual support), digital security measures (to protect against hacking, surveillance and doxing), psychological support (to address stress, burnout and trauma), capacity-building on protection (to train defenders in risk assessment and mitigation) and communications support (including framing messages professionally and managing reputational risks stemming from public narratives) [84]. However, funding for protection measures remains very scarce [85], despite the clearly increased need for protection.

## 2.3. Availability of and access to resources

In order to do their work effectively, CSOs need financial, human and material resources. CSOs typically rely on income and funding from a variety of sources, with different traditions and opportunities across the EU Member States and candidate countries. These include public funding from their own country, other countries, the EU and international organisations, foundations and philanthropic organisations, corporations, individual donors, membership fees and income-generating activities [86].

The CJEU has held that under Article 12 of the Charter, 'legislation which renders significantly more difficult the action or the operation of associations […] by limiting their capacity to receive

financial resources' constitutes an interference with the freedom of association which requires justification [87].

The OSCE/ODIHR and Venice Commission guidelines on freedom of association, and a report to the UN Human Rights Council both note that the ability to seek, secure and use resources is essential to the existence and operation of any association [88]. The Council of the European Union highlighted in 2023 that 'civil society actors at all levels need appropriate and sufficient human, material and financial resources to carry out their missions effectively and that the freedom to seek, receive and use such resources is an integral part of the right to freedom of association' [89].

There is ample evidence underscoring a growing need for work in the areas of fundamental and human rights, democracy and the rule of law. However, the funding available is often insufficient [90]. One reason is the global economic and political climate, due to which both the public and private sectors face economic pressures, an unsure future and shifting priorities. Beyond availability, there are increasing additional pressures on funding for the work of CSOs due to the legal framework, policies and negative narratives.

Some restrictions stem from legislation that has a direct impact on funding, such as rules on foreign funding, taxation, charitable status and philanthropy [91]. Additionally, legislation aimed at ensuring transparency or security may also (inadvertently) result in obstacles to access to funding for CSOs, stigmatise their work or create a chilling effect on advocacy and activism [92].

For example, funding for the work of CSOs can be constrained due to rules that exclude political activity or advocacy from public funding. This becomes problematic if the definitions of 'political activity', 'advocacy' or 'political advertising' are broad and vague, and potentially encompass tasks such as public campaigns, policy research or even routine engagement with policymakers [93]. Such ambiguity in definitions can further discourage CSOs from speaking out on public issues, even when the topic is central to their mission. For instance, research from Ireland finds that nearly one half (48 %) of CSOs working in areas like homelessness and addiction – sectors that are heavily reliant on state funding – self-censor or limit their advocacy due to fears that criticism of government policy could jeopardise their financial support [94].

Furthermore, in some contexts, CSOs that engage in activities deemed 'political' risk losing their charitable status and associated tax benefits – a risk reflected in national legal frameworks where public-benefit or charity status is conditioned on limitations to political or party-linked activity, contributing to legal uncertainty for advocacy-oriented organisations [95].

The Venice Commission [96], along with the case-law of the CJEU [97] and the ECtHR [98], recognise that there may be situations where there is a legitimate need to exercise scrutiny over the receipt and spending of funds by CSOs, including from foreign sources. At the same time, some foreign funding laws are problematic due to disproportionate fines for receiving funding from abroad. Such foreign funding restrictions are often coupled with public debates that label all CSOs that receive funding from abroad as 'foreign agents', even when this term is not included in the actual draft legislation, such as the Slovak amendment to Act No 213/1997 on non-profit

organisations providing services of general benefit in 2025 [99]. The Hungarian law on the transparency of organisations receiving support from abroad of 2017 was found to be in breach of EU law by the European Court of Justice and was subsequently repealed by Hungary [100]. Another such example was the draft act on the registration of foreign agents in Bulgaria of 2024, which, however, was ultimately not adopted [101].

Beyond the 'foreign agents' labelling, CSOs can face other negative narratives, including statements by policymakers and the media that NGOs are disloyal to or against the nation, or are criminals, terrorists, or threats to sovereignty, national security or the national interest [102]. These may harm the reputation of CSOs, which may lead to financial consequences, such as a decline in donations from the general public, an erosion of trust between them and public and private donors, and a need to increase spending on communications and public relations to defend themselves in the public debate [103]. Even if the related legislative proposals are ultimately not adopted, the process and surrounding debate may already disrupt funding flows and cause negative attitudes towards CSOs [104].

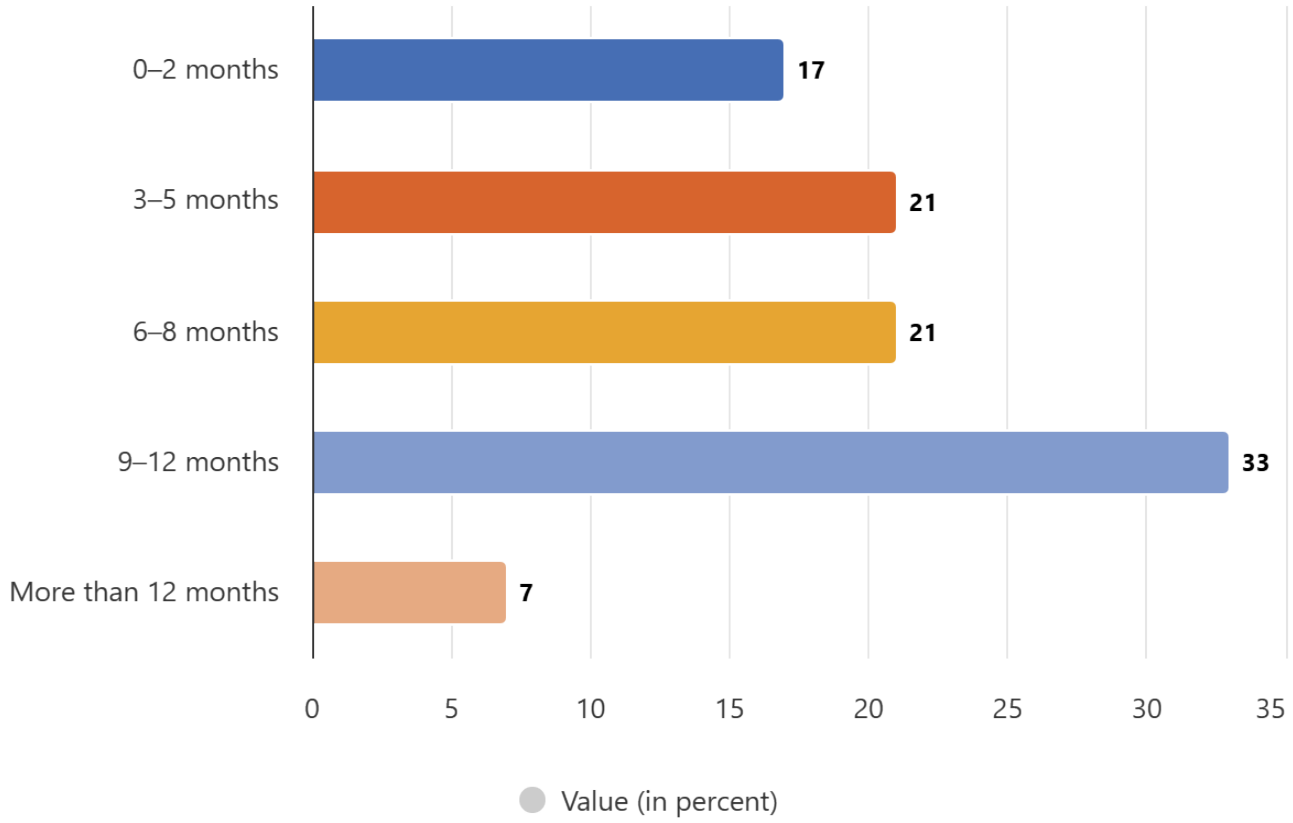
CSOs also report (often unintended) consequences of anti-money-laundering and counter-terrorism financing laws. For example, banks are de-risking or refusing to serve parts of the public benefit sector because of anti-money laundering / counter-terrorist financing compliance fears, leaving organisations without basic banking services [105]. While some legislative or regulatory measures – such as requirements on reporting, due diligence or access to financial services – may not directly restrict funding for CSOs, they can create indirect barriers when applied disproportionately.

Finally, there are also challenges stemming from how funding is implemented. CSOs report that they consider the level of bureaucracy in applying for, implementing and reporting on grants to often be disproportionate in comparison to the scale of the funding and the capacity of many CSOs. While accountability and transparency are essential for lawful public funding, overly complex eligibility requirements and application procedures, detailed reporting obligations that are disproportionate to the funding amount and rigid compliance rules take significant time and effort, and may divert human resources away from frontline work.

Challenges and obstacles to funding have consequences. Almost one half (44 %) of the respondents to FRA's most recent civic space consultation reported that they had experienced an unexpected reduction, cut or freezing of funding in the 12 months preceding the consultation [106]. Among those reporting funding cuts, the largest percentage indicated that this had been done by their national government (37 %).

At the same time, CSOs have little financial reserves (Figure 4): no more than 7 % of respondents to the consultation indicated reserves that would allow them to continue their human rights work for more than 12 months [107]. Coupled with the overall decline in funding, this heightens the vulnerability of CSOs. Without financial buffers, even short-term disruptions in funding may force organisations to scale back, suspend activities or lay off staff, with subsequent effects on the rights holders they support [108].

**Figure 4 – FRA consultation – Months of usual activity covered by CSOs' financial reserves (%)**



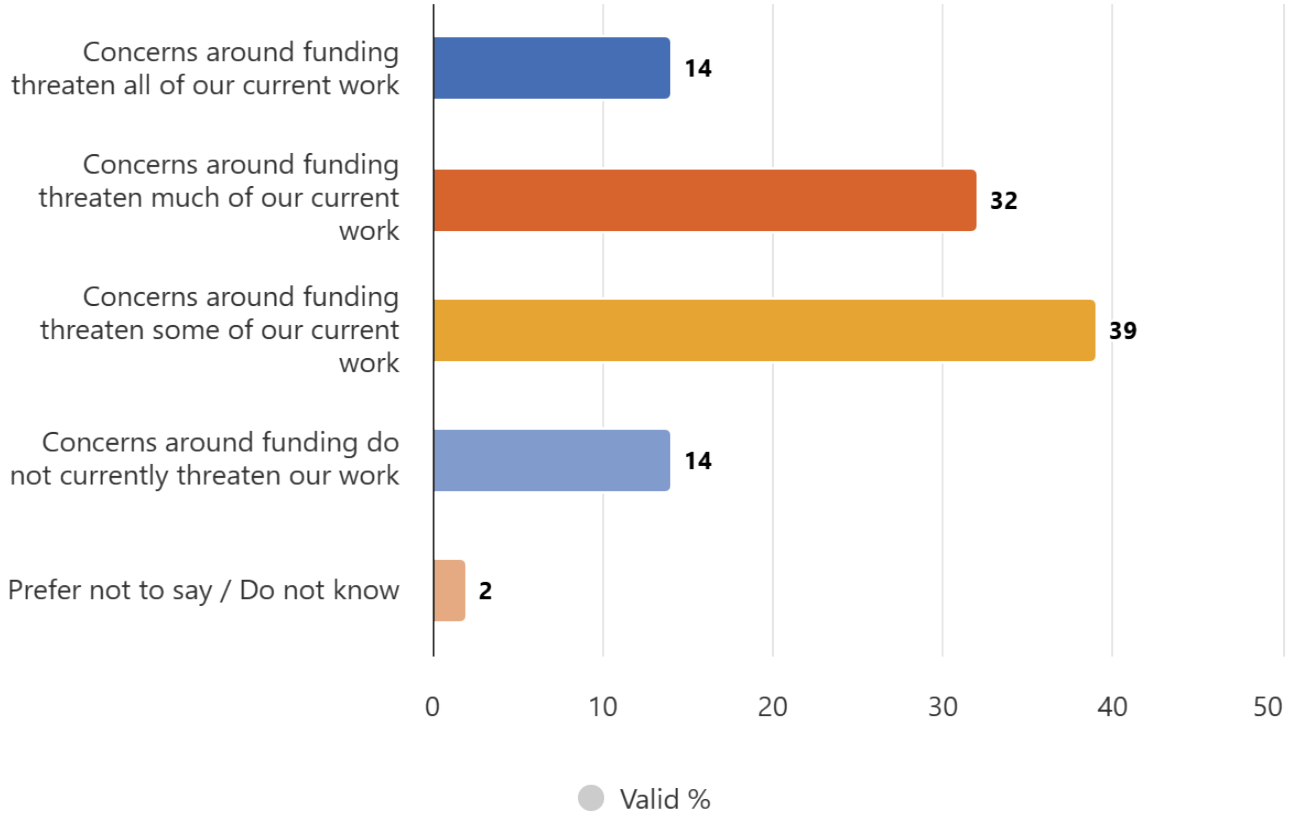

Horizontal bar chart showing the estimated number of months that CSOs' financial reserves could cover their usual activities. Most CSOs report limited reserves, with 17 % indicating they could cover zero to two months, 21 % three to five months, and a further 21 % six to eight months of activity. A larger share, 33 %, report reserves sufficient to cover nine to twelve months. Only a small proportion of CSOs report longer-term financial reserves, with 7 % indicating reserves sufficient to cover more than twelve months of activity.

*Source:* FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025.

*Question*: 'Please estimate the number of months of your usual activity, that your financial reserves could cover?' (*n* = 229)

FRA's consultation also asked CSOs whether funding concerns had been a threat to their work in the previous 12 months. Figure 5 shows that 39 % of the EU-based consultation participants indicated that concerns around funding threaten some of their current work, 32 % percent responded that these concerns threaten much of their work, while 14 % reported that all of their current work was threatened by funding concerns. Only 14 % indicated no current threat to their work stemming from funding issues.

**Figure 5 – FRA consultation – How much of a concern funding has been over the last 12 months (%)**




Horizontal bar chart displaying the extent to which funding concerns threatened the work of CSOs. Most CSOs report that funding concerns affected their work to some degree, with 39 % indicating that some of their current work was threatened and 32 % reporting that much of their work was threatened. A further 14 % report that funding concerns threatened all of their current work. By contrast, 14 % of CSOs indicate that funding concerns did not threaten their work.

*Source:* FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025.

*Question*: 'In the past 12 months, how much of a concern was funding for your organisation?' (*n* = 347)

Taken together, these various pressures – legal, financial, bureaucratic, narrative and reputational – create a complex and often hostile environment for CSOs, undermining their ability to operate independently, advocate effectively and fulfil their role in a democratic society.

# 3. Efforts to promote an enabling civic space and protect civil society

In November 2025, the European Commission published its first ever EU strategy for civil society as a common framework to guide and strengthen the Commission's engagement with civil society organisations throughout the EU, and to promote and sustain a thriving civic space at both the EU and national levels. It is focused on three objectives: fostering engagement, supporting and protecting civic space, and facilitating sustainable and transparent funding. The Commission also invites Member States to 'develop or update dedicated national strategies or actions plan to support, protect and empower civil society organisations and foster a safe and enabling civic space, in line with Commission Recommendation (EU) 2023/2836' [109].

Previously, in this 2023 recommendation on participation, the European Commission had called on Member States to monitor developments in civic space through clear indicators and reporting frameworks, and to also encourage and facilitate cooperation and coordination between all actors involved in the monitoring of developments in civic space. The Commission further encouraged the Member States to adopt dedicated action plans or equivalent initiatives at the national level to foster a safe and enabling civic space. Other international organisations have also pointed to the need for such policies. For example, the OECD 'Practical guide for policymakers on protecting and promoting civic space' underlines the need to recognise civic space as a national policy priority, to review laws and policies against the applicable international standards, respond to identified gaps and continue to regularly monitor how civic space is protected and promoted in practice [110].

To gain a better understanding of the current situation and to inform and inspire national actors in finding the best way to meet these objectives, FRA examined whether the 27 Member States and three FRA observer countries of Albania, North Macedonia and Serbia had a general civil society strategy or development strategy, and whether they had a dedicated policy framework or individual measures in place to enhance and protect an enabling environment for civil society to work on fundamental rights.

## 3.1. Government strategies

As at the end of 2024, two thirds of the countries studied did not have a comprehensive civil society strategy or development strategy as a separate policy document. In Albania, Bulgaria and Croatia, earlier civil society strategies had expired but had not been replaced [111]. In France and the Netherlands, a civil society strategy had only been drafted in relation to civil society outside of the country as part of foreign policy [112].

A more comprehensive approach is found for example in Finland, Latvia and Slovakia. The existence of an enabling environment for civil society is a political criterion for accession to the

European Union. To this end, Serbia has an explicit strategy for creating an enabling environment for the development of civil society for 2022–2030 [113] . An adopted strategy is, however, only as effective as its implementation [114] .

Finland's CSO strategy 2023–2027 outlines how the government will develop civic space, and seeks to develop cooperation between the public administration and CSOs 'to promote genuine dialogue and strengthen democracy' [115] . The strategy seeks to improve the preconditions for CSOs to raise their own funds, continue to develop government grant activities and practices, support access to EU funding in Finland, encourage civic and voluntary activities, and build the knowledge base for civil society policy and cooperation. It also addresses the development of civic space and the inclusion of CSOs at the regional level through the municipalities. The strategy is accompanied by an implementation plan, and implementation will be coordinated by a cross-administrative working group appointed by the Ministry of Justice [116] . In addition to the CSO strategy, civil society is supported through two other complementary programmes.

In Latvia, the development plan for a cohesive and civically active society 2024–2027 includes measures to strengthen the development and sustainability of civil society, such as through ensuring continuous funding for participation and advocacy, improving the general participatory framework, strengthening the financial literacy and capacity of CSOs and supporting the development, capacity and participation of regional CSOs [117] . In Slovakia, the conception for the development of civil society 2022–2030 is complemented by an action plan for 2022 –2016. The main priorities explicitly include creating an enabling environment for the development of civil society. Other goals include increasing the level of citizen participation, building and deepening cooperation between civil society and the public sector and ensuring systematic data collection on civil society [118] .

While few Member States have a comprehensive civil society strategy as such, this does not mean that civic space-related issues are ignored in government strategies and policy documents entirely. Some policy documents are either more specific or of a related scope. For example, in Croatia, improving cooperation with civil society organisations and the media in protecting human rights and combatting discrimination is part of the 2023–2027 national plan for the promotion of human rights and combating discrimination [119] . In Czechia, the government adopted a general strategy for cooperation between the public administration and non-governmental, non-profit organisation for 2021–2030. This covers three strategic areas: improving the social climate for NGOs, supporting effective partnership and cooperation between the public administration and the non-profit sector, and ensuring adequate conditions for the functioning of NGOs [120] . In Sweden, the government's strategy for national human rights work established advisory bodies to enhance collaboration between civil society and the government [121] .

In Ireland, civic space and civil society organisations are framed as the community and voluntary sector, with a national strategy titled *Sustainable, Inclusive and Empowered Communities: A five-year strategy to support the community and voluntary sector in Ireland 2019–2024* and the *National Volunteering Strategy 2021–2025* [122] . Similarly, in Malta, the national volunteering strategy focuses on volunteers and their organisations and establishes an agreement between the

government and the Malta Council for the Voluntary Sector on behalf of the voluntary sector in Malta [123].

In Estonia, France, Ireland, Italy, Latvia, the Netherlands, Romania and Spain, civic space and civil society are addressed in the context of an Open Government Partnership (OGP) action plan [124]. The OGP is an international initiative aimed at promoting the principles of transparency, participation and accountability in government with the participation of 75 states as national members and thousands of CSOs worldwide [125]. In its Member States, OGP multi-stakeholder forums institutionalise government–civil society engagement by providing spaces for dialogue and the co-creation of OGP national action plans [126]. For example, Spain's Open Government Forum (Foro de Gobierno Abierto) exemplifies this approach through a legally established, parity-based structure with clear rules, defined roles and regular working arrangements [127].

As another example of an OGP action plan, France includes 17 commitments grouped around three main thematic priorities: to improve and strengthen citizen participation and democratic innovation practices to give citizens a more prominent role in government decision making, improve inclusion and citizen engagement nationwide to address majority public policy challenges, and use digital technology to encourage more transparent and more participatory government action [128]. In Ireland, the fourth OGP national action plan consists of seven high-level commitments, including two related to civil society and the policymaking process [129].

## 3.2. Government targeted measures

With or without a comprehensive civil society strategy, many of the Member States and FRA observer countries that were studied have measures in place to enhance and protect an enabling environment for civil society to work on fundamental rights. These address one or more of the different aspects of an enabling civic space and the challenges that have been identified in Chapter 2.

Some measures affecting CSOs are embedded within broader programmes. For example, while not directly aimed at civic space or exclusively at civil society organisations, in Germany, a federal programme 'Live democracy' has been supporting civic engagement for a democratic society since 2015. It seeks to protect democracy, promote democratic education and prevent all forms of extremism, including through funding projects. In Finland, as part of the national democracy programme up to 2025, the 'Vapaa! – Fri! [Free!]' project studied and issued recommendations to address the administrative, legislative and other challenges facing civil society and voluntary activities in Finland [130].

In Estonia, the National Foundation of Civil Society is an independent centre for supporting and developing civil society, established and funded by the government. The network of county development centres includes consultants who deal specifically with civil society organisations, including by providing free-of-charge support in project writing, funding options and strategic development. The foundation also hosts a website that serves as a roadmap for CSOs, with quick

answers to frequently asked questions on founding and running a CSO and guidance on navigating the complex world of funding opportunities [131].

An interesting example of an amendment to the legal environment that is viewed as having a protective effect for civic space actors is the criminalisation of doxing (i.e. the provision, distribution or otherwise making available of personal data with the intention of intimidation or harassment) in the Netherlands [132].

Issues regarding the availability of resources and provision of funding have been addressed through various government funding programmes that provide funding or capacity-building support to CSOs. For example, in Portugal, the people 2030 programme includes financial support to CSOs working in the area of equality and non-discrimination, and the action plan for migration includes a measure to strengthen financial support for civil society associations operating in the sector [133]. In Finland, there are measures to help CSOs improve their ability to raise own funds [134], and in Latvia, measures seek to improve the financial literacy of CSOs [135].

Another way in which the funding of civil society has been supported is through taxation policies that provide incentives for CSO funding by private or public actors. For example, in Albania, a 0 % VAT (value added tax) rate has been introduced for projects funded by foreign donors, although there are concerns that administrative burdens have limited the ability of CSOs to benefit from it [136]. In Italy, taxpayers can donate a share of personal income tax to an eligible CSO of their choice [137]. Similarly, in Slovenia, 1 % of income tax may be allocated to publicly beneficial purposes, including NGOs, while in Poland, individuals can donate 1.5 % of their personal income tax to support civil society organisations [138].

Support is also available to Member States through the newly established OGP civic space lab, which is designed to help governments strengthen civic space [139].

## 3.3. Monitoring and reporting by independent public bodies

In many national systems, a key role is played by NHRIs. These are independent, state-mandated bodies that are accredited based on their compliance with the UN Paris Principles that are mandated with promoting and protecting human rights and freedoms, including as these affect civic space and civic space actors. One way that they monitor civic space is through systematic reporting.

For example, in Croatia, the Ombudswoman[AS1], who also holds an NHRI mandate, reports regularly on the situation of civil society organisations, including issues related to the freedoms of expression, information and association, the financing framework, participation, cooperation with authorities and a safe civic space [140]. Similarly, in Spain, the national Ombudsman institution, which is also an NHRI, reports regularly on a safe and protected civic space, the freedoms of association, peaceful assembly, expression and information, access to justice, participation and cooperation with authorities [141].

Ombudsman institutions are generally mandated to address individual complaints, which can also shed light on general trends. They may also monitor and address civic space issues in the course of reviewing complaints by individuals or on their own initiative, where this is in their [AS2]mandate [142] . While NHRIs and Ombudsman institutions are not CSOs, they are considered important civic space actors that also require an enabling environment.

Building on their monitoring role, NHRIs also develop concrete tools and methodologies to assess the enabling environment for civic space and human rights defenders. For example, the Danish NHRI has launched a tool that provides an indicator framework and methodology to systematically monitor progress on the enabling environment for human rights defenders, using human rights-based indicators. The tool is open for use by all stakeholders, such as government authorities, NGOs, academia and think tanks [143] .

At European level, NHRIs cooperate through the European Network of National Human Rights Institutions (ENNHRI), which brings together information from its members. Since 2020, ENNHRI has published an annual report on the State of the Rule of Law in Europe, which includes an analysis of the overall enabling environment for civil society and human rights defenders based on the country reports. In its 2025 report, ENNHRI calls upon national authorities in Europe to 'firmly support the establishment and enabling space for independent and effective NHRIs'. ENNHRI also calls on states to address persisting challenges for the rule of law, including structural human rights issues, and to work together with civil society to ensure the effective implementation of European courts' judgments. ENNHRI also calls upon EU enlargement countries to 'safeguard civic space and human rights defenders, including through legal protections, access to funding and regional and national protection mechanisms' [144] .

## 3.4. Civil society initiatives to monitor, protect and empower

Civil society organisations are also involved in monitoring various aspects of civic space at the national, regional, European and international levels.

For example, the CIVICUS Monitor is a monitoring tool built by a civil society alliance that tracks the state of civic freedoms – specifically the freedoms of association, peaceful assembly and expression – in every country in the world. For two decades it has compiled data from civil society groups, researchers and media sources to rate each country's civic space as 'open', 'narrowed', 'obstructed', 'repressed', or 'closed'. The platform provides real-time updates and analysis on trends and violations [145] .

In the Western Balkans, for the past 12 years, the Monitoring Matrix on enabling environment for civil society development has been published annually by the Balkan Civil Society Development Network (BCSDN). It is structured around three areas: basic legal guarantees and freedoms, the framework for CSO financial viability and sustainability, and the relationship between the government and CSOs. In addition to the annual regional reports, BCSDN also publishes country reports for Albania, North Macedonia, and Serbia, and some of the other EU candidates, i.e. Bosnia

and Herzegovina, Kosovo, Montenegro, and Türkiye [146], prepared by the BCSDN member organisations in each of the countries.

The situation in 21 EU Member States is examined through the prism of the rule of law in the annual *Liberties Rule of Law Report* published by the Civil Liberties Union for Europe. The country chapters in the report include a look at developments in civic space, including the online civic space [147].

In 2025, the European Civic Forum together with Civic Space Watch published a *Civic Space Report* with country reports for 15 EU Member States and a Western Balkans chapter encompassing Albania, Bosnia and Herzegovina, Kosovo, North Macedonia and Serbia, written by 21 member and partner organisations [148].

A recent civil society monitoring initiative that was funded by the EU (citizens, equality, rights and values programme) is the monitoring action for civic space (MACS). MACS is a joint initiative by the European Centre for Not-for-profit Law and the European Civic Forum that tracks developments affecting civic freedoms across the EU. It systematically gathers evidence on laws, policies and practices that impact the ability of civil society to operate, mobilise and advocate. The initiative provides analyses and alerts to support timely responses and strengthen protections for civic space. The first analytical reports by MACS are expected in spring 2026. The system already provides real-time alerts on developments in seven EU Member States (Bulgaria, Denmark, France, Hungary, the Netherlands, Poland and Romania) with plans to expand to more countries [149].

Other smaller civil society initiatives cover certain countries or certain aspects of civic space, such as the two EU-funded projects 'Civic champions', which monitors new and emerging threats to CSOs in Bulgaria, Cyprus, Greece and Italy [150], and 'B.RIGHT SPACES' (better rights in better civic spaces), which aims to understand, develop and network civic spaces at the local level [151].

Many of these civil society actors also contribute to the country visits and country reports for the European Commission's annual *Rule of Law Report*, which also looks at civic space in the context of the national system of checks and balances. The aim of these reports is to identify inconsistencies with rule of law standards at an early stage so governments can respond to them before they become more problematic. Through input from various civil society actors, the *Rule of Law Report* is also seen to serve 'as a stimulus for deeper civil society and stakeholder engagement' [152]. The 2025 report notes that 'most Member States continue to ensure an enabling and supportive framework for civil society'; however, the trend of increasing challenges for civil society has continued. Progress over past years is noted in the recommendations for Ireland, Poland and Sweden, while recommendations relating to civic space are made in the country reports of Germany, Greece, Hungary and Poland [153].

In addition to monitoring civic space, CSOs are active in finding ways to protect but also empower other CSOs. All civic space actors, including CSOs and less formal associations, need resources of all kinds to operate effectively, including the knowledge and capacity to engage meaningfully with public authorities. In a number of countries, this know-how is supported by a central

organisation. For example, the National Resource Centre for Civil Society in Albania is run by two CSOs and a think tank and plays a crucial role in supporting civil society organisations by enhancing their capacity, promoting participation in decision making and monitoring the enabling environment. The centre provides training, technical assistance, mentorship and guidance to CSOs in navigating legal and financial challenges, such as registration and taxation. It also provides legal advice and resources to CSOs to help them address bureaucratic obstacles and political interference and respond strategically to pressures on civic space through legal action and coordinated advocacy [154].

Other initiatives by CSOs include a civic participation toolkit published by the multinational CSO The Good Lobby, with information on the different forms of participation in public and political life available to citizens, associations and social movements. The toolkit aims to empower citizens and civil society actors to fight for the issues they believe in and includes practical examples of how to influence law- and policymaking [155].

As another example, the pan-European Civil Liberties Union for Europe has published several toolkits to strengthen the capacity of CSOs, including training on how to use the EU Charter of Fundamental Rights to advance the protection of fundamental rights in the EU, training on cybersecurity awareness, and a messaging guide for civil society actors facing smear campaigns [156].

Also, at the pan-European level, the European Civic Forum published two papers in 2024 on the protection of CSOs and HRDs in the EU [157]. Based on their findings, a pilot project 'Net4Defenders' has been launched to adopt a proactive approach to protecting civic space in Europe. Selected CSOs at the national level in France, Italy, Poland, Slovenia and Spain are serving as 'protection hubs' that are piloting approaches to holistic protection and serving as focal points for coordinated support, including legal advice, psychological support and digital protection / cybersecurity measures [158].

At the national level, in Cyprus, for the past three years, the NGO Civil Society Advocates has been running a project to monitor the implementation of the law regulating the operation of CSOs. The project is aimed at identifying gaps and good practices, and fostering better cooperation between CSOs and government ministries, including through seminars, conferences and online consultations with CSOs [159].

CSOs can contribute to strengthening democracy and democratic resilience through efforts to combat disinformation and other forms of FIMI. For example, in Lithuania, since 2018, the non-profit organisation Civic Resilience Initiative has focused on countering foreign influence in democratic processes by enhancing societal resilience through educational programmes. Democracy is also cultivated through the democracy festivals that are held in a number of countries in Northern Europe, including the EU Member States Denmark, Estonia, Finland, Latvia, Lithuania and Sweden. These festivals feature constructive political dialogue in an informal setting between government officials, politicians, civil society organisations, businesses, media, academia and the general public [160].

# 4. Framework for the effective participation of civil society organisations in policymaking processes

In international human rights law, the right to participate in democratic processes finds its roots in Article 25 of the International Covenant on Civil and Political Rights. This provision requires states to give all citizens the right and the opportunity to take part in the conduct of public affairs, directly or through freely chosen representatives. It was not originally intended to establish a binding obligation for government to consult with civil society or other stakeholders as a rule [161]. However, since the 1990s, the understanding of democracy has shifted from a purely representative model to a model of representative democracy complemented by active involvement of people in decision-making processes [162]. Direct consultation with stakeholders, including civil society organisations, is characteristic of such participatory democracy [163]. This is reflective of the open government and good governance movement that is based on the principles of transparency, integrity and stakeholder participation in support of democracy and inclusive growth [164].

Some specific human rights instruments at the UN level impose an obligation on states to consult with those who are affected by their implementation. For example, the United Nations Convention on the Rights of Persons with Disabilities requires states to consult with and actively involve persons with disabilities through their representative organisations. Article 8 of the Aarhus Convention requires states to strive to promote effective public participation at an appropriate stage when drafting legally binding rules that may have a significant effect on the environment, and to take the results of the public participation into account as far as possible [165]. More generally, however, consultation with civil society is still primarily a matter of good lawmaking, not legal obligation, unless states have chosen to adopt such rules in their national systems. Nevertheless, even in relation to the national level, some scholars have recently argued that inclusive participation in lawmaking processes is more than just a matter of good governance, rather it should be viewed as a constitutional principle and obligation [166]. The Council of Europe published 'Guidelines for civil participation in political decision-making' in 2017 [167].

Also at the EU level, the importance given to participatory elements has increased over time. According to the Treaty on European Union (TEU), the functioning of the EU is founded on representative democracy, where citizens are represented directly in the European Parliament and through their democratically elected governments in the Council and the European Council. Additionally, however, Article 10(3) of the TEU provides that every citizen has the right to participate in the democratic life of the Union, and that decisions shall be taken as openly and as closely as possible to the citizen. Article 11 of the TEU requires that EU institutions hear citizens and their representative organisation in all areas of EU action, and maintain an open, transparent and regular dialogue with representative associations and civil society. The EU strategy to strengthen the application of the Charter, along with many sectoral EU action plans and strategies, call for the engagement of CSOs throughout the design, implementation and evaluation of relevant

measures [168].

Engagement with civil society is also one of the three key pillars of the recently published EU strategy for civil society [169]. The strategy announces the establishment of a Civil Society Platform which will provide a regular and structured framework for dialogue on the protection and promotion of EU values, streamlining and strengthening engagement on fundamental rights, democracy, equality and the rule of law, and offering a space to address challenges faced by CSOs working in these areas. The strategy also proposes 10 guiding principles for dialogue between the Commission and civil society [170].

Moreover, as part of the EU's institutional architecture, the European Economic and Social Committee is an EU advisory body representing employers, workers and civil society organisations that is heralded as 'the voice of organised civil society in Europe' [171]. At the EU level, the Have Your Say public consultations platform [172] allows citizens and businesses to share their views on new EU policies and existing laws, while the Citizens' Engagement Platform [173] allows for individual to collaborate on input and also features the European Citizens' Panels that bring together 150 randomly selected citizens from across the EU to make recommendations on key policies that affect everyone in the EU [174].

In any case, the expectation that stakeholders will be consulted on public policy-making processes has become an established feature of European democracies. To gain a better understanding of the current situation and to inform and inspire national actors in finding the best way to incorporate participatory democracy into their law- and policymaking, FRA research examined the situation in 27 Member States and three FRA observer countries. As this chapter will show, throughout the Member States and FRA observer countries, the development of a model of representative democracy that is complemented effectively by a participatory democracy framework is still very much a work in progress. Despite improvements, channels for CSOs to participate effectively in policy and decision-making have yet to be fully developed. According to data from FRA's civic space consultation [175] which are corroborated by other sources [176], the reported/perceived challenges in CSO participation include limited interest or time among policymakers to consult meaningfully, difficulties in accessing consultations, weaknesses in consultation processes, insufficient feedback on follow-up to consultations and insufficient capacity among organisations to contribute, including due to a lack of funding for such processes. Furthermore, cooperation is often ad hoc and incident specific. These challenges are exacerbated for those organisations working with groups or persons at risk of exclusion [177].

## 4.1. Rules and practices to support participation at the national level

The 2023 Commission recommendation on participation calls for a clearly defined policy or regulatory framework for civil society participation that allows for meaningful input. Such frameworks should clearly define procedures and the relevant actors involved. Member States are encouraged to provide adequate information and sufficient resources and time to allow for appropriate participation and meaningful impact. The framework should be transparent, inclusive

and accessible, and also reach out to those who may be underrepresented, including the most vulnerable and marginalised persons [178]. In the 2024 *Fundamental Rights Report*, FRA echoed this recommendation, calling for Member States to review their legislation to ensure that rules on public participation are clear and sufficiently broad. Moreover, the inclusion of expertise in fundamental and human rights and people in vulnerable situations, such as LGBTIQ+ people, persons with disabilities and members of ethnic, racial and religious minorities, should be promoted and enabled [179]. In the new EU strategy for civil society published in November 2025, the Member States are once again invited to strengthen engagement mechanisms and policies towards full implementation of the recommendation as regards the effective participation of civil society organisations.

### 4.1.1. Examples of frameworks for the participation of civil society organisations in public policymaking

FRA research reveals that, as at the end of 2024, the situation varies considerably across the 27 Member States and the three FRA observer countries. Whereas the majority of countries have established at least some binding rules for public authorities on public participation, one third consult with civil society solely on the basis of non-binding guidelines, frameworks and practices. Some countries have quite a broad and well-developed binding framework, while in others the scope is rather limited. Both binding and non-binding frameworks function with varying degrees of consistency and effectiveness. This is particularly the case since in many countries, a significant amount of discretion is left to policymakers, government ministries or parliamentary committees as to whether, when and how to consult with CSOs. Where binding rules exist, they usually do not meet all of the expectations for a framework as set out in the recommendation. It would also appear that having a framework is no guarantee of meaningful participation in practice.

For example, Portugal has a broad framework, with binding rules on public consultation covering all legislative initiatives at both the parliamentary and governmental levels. The parliament hosts an online consultation platform for input on legislative files, and the responsible standing committees are also obliged to organise consultations with the organisations representing the sector in question where there is a constitutional or legal right to be heard, for example in the areas of disability, consumer protection, family and education policy. More specifically, trade union associations have a right under the constitution to participate in the drafting of labour legislation. CSOs can also have a say on legislative initiatives originating in the government through its online public consultation portal [180].

In contrast, binding rules are rather limited, for example in France, where consultations with civil society organisations are mandatory only under the French Labour Code in relation to individual and collective labour relations, employment and professional training [181]. However, engagement with civil society is also structured through the French Economic, Social and Environmental Council (ESEC) that is defined by the French Constitution as the third assembly, after the Senate and the National Assembly. Moreover, in 2024 the French Government, as part of

its policy to renew democracy, published an interministerial guide on public participation [182].

In most Member States, the rules on consultation are spread out in different laws, regulations and guidelines, and may differ depending on who the legislator is or what the topic is. For example, in Poland, there are different rules relating to stakeholder consultation for legislation drafted by a ministry, and for both the lower and upper houses of parliament. While parliament is required to consult with some stakeholders, there are no legal requirements to organise consultations with civil society more broadly. For legislation drafted in government ministries, the ministry or authority drafting a legislative act may refer the draft for public consultation, but this will depend on factors such as its expected social and economic effects. There are, however, no clear criteria to set the limits to this discretion and therefore for any right to be consulted. CSOs in Poland have raised concerns about the declining quality of legislation due partially to very short deadlines for the adoption of legislation and other ways of bypassing meaningful consultation [183].

A more comprehensive approach has been taken by Austria, which has broad binding rules, guidelines for public authorities, and easily accessible information for members of civil society and the general public (see the box below) [184].

**Promising practice – Comprehensive approach to consultation in Austria**

In Austria, the law was amended in 2021 to require that all legislative initiatives that are discussed in parliament, whether they originate in the government or in parliament, must undergo an open consultation procedure. Information on how to participate and the online participation platform are easy to access on the website of the Austrian Parliament. There is also a detailed guide for the public service on the design and execution of the participation process in all policy areas throughout the policy cycle.

*Source:* Austrian Parliament, 'Begutachtungsverfahren', Parlament Österreich website

The framework in Luxembourg provides for both mandatory and discretionary consultations, depending on the subject matter, however without clear rules on timelines or an obligation to give feedback. Moreover, this framework is applicable only in relation to policy and legislative proposals that originate from the government.

A developed framework in and of itself does not guarantee meaningful consultation, for various reasons. For example, the rules in Romania are quite clear and broad. Minimum rules for public consultation are focused in a law on decisional transparency in public administration. The law sets the requirements for public consultation for the central and local public authorities and other public institutions. It imposes an obligation to publish all draft legislation for consultation, and for the initiator to respond to any comments. However, the same law also defines the exceptions for emergency decisions which do not have to undergo the normal consultative process. In practice,

the exceptions have been described as controversial, and it has been reported that these rules on consultation are not necessarily followed [185]. Similarly, in Croatia, the obligation to conduct public consultations is set out in the Act on the Right to Access to Information. Public consultations must be held for at least 30 days, and the authorities must publish a report on the consultation to provide transparency in the consultation process. The framework for the participation of civil society organisations and other stakeholders is found in a code of practice that sets standards for the form, duration and methods of public consultations, but this document is not legally binding. However, civil society organisations have reported that in practice, the quality and consistency of feedback can vary [186].

**Promising practice – Consultation guide for legislative drafting in Finland**

The Ministry of Justice of Finland has published comprehensive guidelines for consultation in the legislative drafting process. It addresses such issues as the scope, objective, planning, timing and methods of consultation, how to map participants and design consultation questionnaires to allow for the processing of meaningful input, how to provide feedback and how to record input and feedback in the explanatory memorandum of the legislative proposal. The guide also includes information on obligations under the law for consultation with the indigenous Sami people, social partners, universities and churches, and linguistic requirements to protect the interests of the Finnish, Swedish and Sami speaking populations, and users of Finnish and Finland-Swedish Sign Language. The online guidelines include links to examples of different stages of successful consultation processes.

Austria and Sweden have similarly comprehensive guidelines.

*Source:* Ministry of Justice of Finland, 'Säädösvalmistelun kuulemisopas', Finlex website, 4 February 2016.

Even if not binding, there may exist a well-established framework and practice. For example in Sweden, the consultation procedure is a well-established way for CSOs to participate in political decision-making processes. The framework is established in law but does not set any minimum timeframe. Nevertheless, the standard practice is to give stakeholders three months to submit input to consultations [187]. In Belgium, while there are no binding rules requiring that CSOs be engaged by public authorities in participation, consultations are nevertheless frequent [188]. Similarly in Germany, FRA data show that there are no specific binding rules in relation to CSOs, but it is common practice in the legislative process to consult experts and stakeholders in the practice of federal states and association participation. However, there is a significant amount of discretion left to the ministries as to whom to consult, and regarding the timing and scope of consultation, and there are also no guidelines on how to ensure the participation [189].

A number of documents by international organisations provide additional guidance on enhancing meaningful participation, such as the Council of Europe's 'Guidelines for civil participation in political decision-making' [190], the 'OECD guidelines for citizen participation processes' [191], the OSCE/ODIHR 'Recommendations on enhancing the participation of associations in public decision-making processes' [192] and the OSCE/ODIHR *Guidelines on promoting the political participation of persons with disabilities* [193].

### 4.1.2. Use of technology in consultations

The Commission's recommendation on participation calls on Member States to explore the use of new technologies to facilitate and enhance participation. As technology has advanced, legislative files and legislative processes have become digitalised and more readily accessible for public authorities, politicians and stakeholders of all kinds. This has also increased the importance of digital literacy to avoid widening digital divides that might limit the diversity of participants [194]. It is likely that these increased possibilities have also raised expectations for consultations. Not surprisingly, online consultation platforms of one type or another are used in the majority of EU Member States.

While online platforms have the potential to allow for broad consultation and input, they may be less effective where there is no underlying legal framework. For example, in the Netherlands, internet consultation has been part of the legislative process since 2011 but it is not mandated by any binding rules. In practice, it is up to the ministries to determine which proposals require consultation [195]. Without a legal framework, such platforms are also less likely to be in full compliance with fundamental rights, including as these relate to inclusiveness, accessibility and data protection.

Decidim is a digital platform for citizen participation that has been designed to support participatory democracy. It allows citizens and institutions to co-create public policy online. It is built as an open-source tool and is used by the European Commission, national and regional governments (such as the French National Assembly and the Belgian federal government), cities (such as Barcelona and Helsinki), CSOs and universities [196].

Indeed, factors such as inclusiveness, transparency and respect for the freedom of information also affect whether consultation will be meaningful and effective. This includes who is notified of a consultation either systematically or on an ad hoc basis based on relevance, who has the right to contribute to a consultation and whether any feedback is provided to participants. For example, in Spain, a notification is sent automatically through the online consultation system to all identified stakeholders. In Estonia, the government legislative information system allows anyone to upload comments and access the positions and comments of all public authorities and stakeholders that have contributed to the process. Feedback on why the contributions were or were not incorporated into the draft is also provided on this same platform [197].

The overview of the existing frameworks shows that they do not generally meet the expectations

of the Commission's recommendation. The invitation to Member States to strengthen engagement mechanisms to fully implement the 2023 recommendation on participation is therefore welcome and timely. There is significant room for development to establish a general framework that could help ensure the meaningful and effective participation of civil society in law- and policymaking at the national level. Without clear rules and guidelines for their implementation, participatory frameworks will not be sufficiently clear or ensure inclusiveness. Without sufficient information and clear objectives for consultation, policymakers will not fully benefit from the expertise of CSOs or sufficiently take into consideration the interests and rights of all persons affected by a proposed policy. Without transparency and feedback, there is a risk that the full potential to improve the quality of legislation and trust in the democratic process will be undermined.

## 4.2. Government consultative and participatory structures to support participation at the national level

In the recommendation on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes, in addition to a safe and enabling environment, Member States are encouraged to create strategic partnerships between public authorities and civil society organisations to foster their participation in public policymaking processes. Ideally, there should be regular, long-lasting and result-oriented structured dialogues with CSOs that go beyond consultation for specific policy or legislative proposals [198].

FRA examined whether there are bodies or structures, established by government, that ensure the participation of civil society in developing, implementing or monitoring laws and policies at the national level. This includes both general bodies and bodies or structures in a specific sector. As at the end of 2024, the situation in the 27 Member States and in FRA observer countries varied considerably.

In some countries, for example Cyprus and Estonia, no such formal body exists [199]. On the opposite end of the spectrum is France, with the ESEC. It is heralded as 'an essential cog in [French] democracy' and as 'a democratic expression of civil society in action'. Eighty-two organisations (companies, trade unions, associations, NGOs, etc.) nominate 175 members for a five-year term. The ESEC advises the government and the parliament in the development of economic, social and environmental policy. Since 2021, it is also responsible for fostering broader citizen engagement [200].

A similar structure, the Social and Economic Council (Sociaal-Economische Raad) has been established under the law of the Netherlands to advise the government and parliament on socioeconomic policy [201]. Romania also has an Economic and Social Council established by statute that members of the government and parliament must consult when drafting legislation that regulates socioeconomic matters [202]. In Sweden, the national body for dialogue and consultation facilitates collaboration between public actors and civil society in all areas of politics, based on an agreement signed in 2018 between the Swedish government and Swedish civil

society [203].

CSOs are included in government bodies that are specifically mandated to develop policies that affect civic space in a wide range of countries, including Albania, Bulgaria, Croatia, Finland, Latvia, Lithuania, Malta, North Macedonia, Poland, Serbia, Slovakia, Slovenia and Sweden. For example, Slovenian legislation establishes a Council for the Promotion of the Development of Voluntarism, Volunteer Work, and Non-Governmental Organisations as an expert and advisory body on matters related to volunteering and NGOs. The council consists of 16 members, including four representatives from NGOs and four from volunteering organisations. The Council of the government of the Slovak Republic for Non-Governmental Non-Profit Organisations is an expert, advisory, coordinating and consultative body that has a chamber of NGOs (32 members) and a chamber of public administration (20 members). However, perceptions as to how well such bodies function vary between states. For example, in Croatia, although the council comprises 37 members, including representatives from government bodies, CSOs, foundations, trade unions, employers' associations and local government associations, there has been criticism that the CSOs can easily be outvoted by government representatives [204].

While many states have umbrella organisations representing youth organisations, only a few have established some type of body to ensure a more systematic participation and engagement of children and youth in policymaking. For example, in Germany, the Children's Commission (Kommission zur Wahrnehmung der Belange der Kinder) is a permanent sub-committee of the Committee for Family Affairs, Senior Citizens, Women and Youth in the federal parliament. It sees itself as a guardian of children's interests and has engaged with CSOs, experts and children themselves since 1988 to raise awareness and influence policy [205]. In Poland, the Council for Dialogue with the Young Generation (Rada Dialogu z Młodym Pokoleniem) has been established by law, with 20 members including representatives of the President of Poland, the Children's Rights Commissioner, the prime minister, ministries, local governments and youth councils operating at the local level [206]. In North Macedonia, a law mandates the establishment of a youth assembly that would elect representative to the national advisory body for youth policies, but neither of these bodies has yet become operational [207]. While not a government body, in Portugal, the National Youth Council (Conselho Nacional da Juventude) is a not-for-profit organisation that brings together youth organisations and regional youth councils. Portuguese law guarantees the independence and autonomy of the council and obliges the state to provide it with funding and consult with it on matters related to young people [208].

In Denmark, the Youth Climate Council has a more specific mandate to advise the government on issues related to climate change, with the goal of bringing new thinking into Danish climate policy. Its members are appointed for a two-year period, with some members serving in an individual capacity while others represent Danish youth organisations and movements [209].

Across the countries studied, other bodies address more specific issues ranging from human rights in general to non-discrimination, LGBTIQ+ issues, ethnic and/or religious minorities, sustainable development, senior citizens, education and persons with disabilities [210].

**Promising practice – Council of Non-Governmental Organisations in Lithuania**

The Council of Non-Governmental Organisations (Nevyriausybinių Organizacijų Taryba) is a public advisory body operating under the government. It is composed of 9 representatives from state institutions and agencies, 1 representative from the Association of Lithuanian Municipalities, and 10 representatives from NGOs. It provides a structured and transparent dialogue between civil society and public authorities. This formal mechanism is seen to support both consistent and meaningful engagement, including in policymaking.

*Source*: Ministry of Social Security and Labour of the Republic of Lithuania, 'Nevyriausybinių organizacijų taryba', Lietuvos Respublikos Vyriausybė website, 25 February 2026.

As the landscape of partnerships and established structures is diverse and developed to very differing degrees across the Member States, implementation of the EU recommendation on participation would benefit from additional evidence-gathering and further analysis of existing approaches with a view to identifying their respective strengths and weaknesses. As suggested in the EU strategy for civil society, enhanced cooperation and the exchange of experience and good practices among Member States and with EU-level actors could support more consistent and effective implementation of participatory frameworks across the EU.

# Conclusion

The continuing challenges to civic space in the EU are confirmed by data collected by FRA and others. While their nature and depth vary across the Member States and depend on the area of activity of the CSOs, several patterns recur across countries and across time, with several of the identified problems becoming more serious in recent years, such as the availability of and access to funding.

Without a comprehensive and clear overview of the situation within a given Member State and across the EU, efforts of national authorities, the European Commission, NHRIs, Ombudsman institutions and CSOs risk being less targeted, coordinated and effective. More efforts are therefore needed to monitor the situation and look at civic space in a holistic manner. Strategies, action plans and individual measures are only as effective as their implementation. Monitoring by public authorities, NHRIs, Ombudsman institutions, CSOs and other civic space actors can help ensure that policy is targeted and adjusted effectively to meet its set objectives.

The recommendations laid down in this report can be instrumental for the EU and its Member States when designing the way forward for civic space in the EU. Taken together, they seek to provide a blueprint for better monitoring of civic space developments at the EU and national levels, the development of national strategies and measures that prevent challenges to an enabling environment, strengthening the protection of civic space actors, securing access to funding, and allowing for enhanced participation and engagement in law- and policymaking as a key pillar of a healthy and resilient democracy.

# Annex: Methodology

Since 2018, FRA has reported on civic space based on the perceptions and experiences of civil society organisations (CSOs) participating in the Fundamental Rights Platform. These reports place CSOs and their concerns at the centre, focusing on the regulatory environment, the availability and accessibility of resources, and incidents of attacks and harassment.

This report adds a new dimension by examining CSOs not only as stakeholders affected by civic space conditions, but also as active contributors to the democratic functioning of our societies (Chapter 2). It further highlights the efforts made by Member States to promote an enabling civic space and to protect civil society, analysing both overarching government strategies and targeted measures (Chapter 3). In addition, it deals with the frameworks, rules, practices and consultative structures that facilitate the effective participation of CSOs in policymaking processes (Chapter 4).

By broadening its scope, the report emphasises the role of CSOs as actors shaping and creating social realities, rather than viewing them solely as recipients of government policies and norms.

The data and information presented in this report stem from three main sources which informed the different parts to varying degrees.

Firstly, FRA's research network, Franet, provided research on the enabling environment in all EU Member States, Albania, North Macedonia and Serbia. This information maps national approaches to civic space monitoring, participation and protection. All of the country research on civic space delivered by Franet is available on the FRA website. The research covers the situation up to the end of December 2024. These data primarily inform Section 3.1 on government strategies, Section 3.2 on targeted measures to promote an enabling civic space and protect civil society and Section 4.1 on rules and practices to support participation at the national level.

The questionnaire for Franet included the following questions:

- *Monitoring and reporting on civic space*
  - Has there been any initiative from the side of the State (government/parliament) to observe/monitor the restrictions/challenges/threats for civic space actors in your country in the last three years?
  - Has there been any other actor/body/mechanism that has observed/monitored civic space restrictions/challenges/threats in your country in the last three years?
- *Participation*
  - Are there any binding rules in place in your country for the participation/consultation of civil society organisations for developing/implementing/monitoring laws and policies? This could be a regulatory framework, or a targeted policy, or guidelines.

    - Are there any consultative/participatory bodies in your country that ensure the participation of civil society in developing/implementing/monitoring laws and policies?
    - Does your Member State fund or carry out meaningful awareness raising and/or capacity building to support participation in your country?
- *Enabling environment and protection*
    - Does your country have a general civil society strategy / civil society development strategy in place?
    - Is there a dedicated policy/framework (or support measures) in place in your country to enhance and protect an enabling environment for civil society to work on fundamental rights?
    - Is there a dedicated law (and/or guidelines) in your country dealing specifically with the recognition and/or protection of human rights defenders?
    - Is there any dedicated support/funding by the State for the protection of (individual) human rights defenders in your country?
- *Promising practice: Please highlight one specific practice that you consider a promising practice on civic space in your country – in the area of civic space including monitoring, participation, enabling environment, and protection? (optional)*

Secondly, an online consultation captured the experiences and perceptions of CSOs in 2024. These consultation data primarily inform Chapter 2 on challenges faced by civil society organisations. Since 2018, FRA has consulted key players in civil society annually on their experiences relating to civic space through its Fundamental Rights Platform. In total, 453 CSOs working on fundamental and human rights in the 27 EU Member States, Albania, North Macedonia and Serbia responded to the latest online consultation, which was open from 26 February 2025 to 7 April 2025. The majority of responding organisations (60 %) work at the national level, 22 % are primarily active at the local level and 18 % of the responding organisations work at the EU/international level. They work in a range of areas, including advocacy, campaigning and awareness-raising, service provision, community engagement, victim support, research and data collection, and litigation. Most respondents (almost 90 %) are NGOs; the remainder are social or professional organisations, faith-based organisations or trade unions. Responses were received from all EU Member States except Luxembourg, with response rates ranging from 1 responding organisation in one Member State to over 20 in 6 other countries.

The questionnaire comprised the following sections.

- *About your organisation.*
- *Situation of civil society organisations: general conditions and concrete experiences.*
- *Access to finance and other resources.*
- *Experiences of threats and attacks.*
- *Impact of attacks and reporting.*

- *Enabling regulatory environment and laws.*
- *Access to decision-making processes and participation.*
- *Closing questions.*

The full questionnaire is available on FRA's website. For details of results and findings, see 'Summary of key findings from FRA's civic space consultation covering 2024'.

Thirdly, this report was also informed through desk research, interviews and stakeholder meetings for a number of purposes. First, to identify the ways in which civil society and an enabling civic space contribute to democracy and democratic resilience (Chapter 1); second, to provide a more detailed overview of challenges for CSOs (Chapter 2); third, to identify monitoring and reporting efforts undertaken by independent public bodies and civil society initiatives to monitor, protect and empower civic space (Chapter 3); and finally, to frame Chapter 4 on frameworks for the effective participation of civil society organisations in policymaking processes. Additional sources of information included exchanges with intergovernmental organisations and participation in conferences, workshops and focus group discussions with civil society representatives, think tanks and NHRIs. Desk research drew on sources available up to January 2025.

# Acronyms and abbreviations

- **BCSDN** – Balkan Civil Society Development Network
- **CSO**– civil society organisation
- **ECHR** – European Convention on Human Rights
- **ECtHR** – European Court of Human Rights
- **ENNHRI** – European Network of National Human Rights Institutions
- **ESEC** – Economic, Social and Environmental Council
- **EU** – European Union
- **FIMI** – foreign information manipulation and interference
- **FRA** – European Union Agency for Fundamental Rights
- **HRD** – human rights defender
- **LGBTIQ+** – lesbian, gay, bisexual, transgender, intersex or queer
- **NGO** – non-governmental organisation
- **NHRI** – national human rights institution
- **MACS** – monitoring action for civic space
- **OSCE** – Organization for Security and Co-operation in Europe
- **ODIHR** – Office for Democratic Institutions and Human Rights
- **OGP** – Open Government Partnership
- **SLAPP** – strategic lawsuit against public participation
- **TEU** – Treaty on European Union
- **UN** – United Nations

# Endnotes

[1] President Ursula von der Leyen, 2025 State of the Union address, Brussels, 10 September 2025.

[2] European Commission: Directorate-General for Communication, Europe's Choice: Political guidelines for the next European Commission 2024–2029, Publications Office of the European Union, Luxembourg, 2024.

[3] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Strategy to strengthen the application of the Charter of Fundamental Rights in the EU, COM(2020) 711 final of 2 December 2020.

[4] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025.

[5] Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on the European preparedness Union strategy, JOIN(2025) 130 final of 26 March 2025.

[6] Economist Intelligence Unit, 'Democracy Index, 2024', Our World in Data website, 5 March 2025.

[7] World Justice Project, 'WJP Rule of Law Index', World Justice Project website, 2025.

[8] Civicus, 'Monitor tracking civic space', Civicus website, December 2025 (2024 and 2025 data).

[9] Consolidated version of the Treaty on European Union – Title I – Common provisions – Article 2 (OJ C 236, 7.8.2012, p. 17).

[10] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – 2024 rule of law report – The rule of law situation in the European Union, COM(2024) 800 final of 24 July 2024, p. 4.

[11] FRA, Europe's Civil Society: Still under pressure – Update 2022, Publications Office of the European Union, Luxembourg, 2022.

[12] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025, point 2. See also Regulation 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast) (OJ L, 2024/2509, 26.9.2024), recitals 10 and 113.

[13] Council of Europe, Towards a New Democratic Pact for Europe – Report of the Secretary General of the Council of Europe 2025, Council of Europe Publications, Strasbourg, May 2025.

[14] Joint Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – European democracy shield: Empowering strong and resilient democracies, JOIN(2025) 791 final of 12 November 2025.

[15] ECtHR, 17 February 2004, Gorzelik and others v. Poland, ECLI:CE:ECHR:2004:0217JUD004415898.

[16] Tamang, S., 'The role of civil society in strengthening democracy', International Journal of Creative Research Thoughts (IJCRT), Vol. 12, Issue 2, 2 February 2024, IJ Publication, Ahmedabad, pp. 10–17.

[17] Council of Europe, 'Reykjavík Principles for Democracy – Appendix III of the Rejkjavík Declaration', Steering Committee on Democracy website, 16–17 May 2023; European Law Institute, Charter of Fundamental Principles of a European Democracy, Vienna, 22 July 2024.

[18] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on defence of democracy, COM(2023) 630 final of 12 December 2023; Council of the European Union: General Secretariat of the Council, 'Presidency conclusions on strengthening EU democratic resilience', 9463/25, Brussels, 27 May 2025; OSCE/ODIHR, Guidelines on Democratic Lawmaking for Better Laws, Warsaw, 2023, p. 3.

[19] OECD, OECD Survey on Drivers of Trust in Public Institutions – 2024 results – Building trust in a complex policy environment, 2024, p. 12.

[20] European Commission: Directorate-General for Justice and Consumers, Special Eurobarometer 568 – Protecting and promoting democracy – Report, Publications Office of the European Union, Luxembourg, 25 November 2025, p. 81.

[21] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025, p. 4.

[22] Niinistö, S. (Special Adviser to the President of the European Commission), Safer Together – Strengthening Europe's civilian and military preparedness and readiness, Brussels, 30 October 2024, p. 13.

[23] Council of the European Union: General Secretariat of the Council, 'Presidency conclusions on strengthening EU democratic resilience', 9463/25, Brussels, 27 May 2025, p. 5.

[24] European Commission: Directorate-General for Justice and Consumers, Special Eurobarometer 568 – Protecting and promoting democracy – Report, Publications Office of the European Union, Luxembourg, 25 November 2025.

[25] Niinistö, S. (Special Adviser to the President of the European Commission), Safer Together – Strengthening Europe's civilian and military preparedness and readiness, Brussels, 30 October 2024, p. 74.

[26] Joint Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – European democracy shield: Empowering strong and resilient democracies, JOIN(2025) 791 final of 12 November 2025.

[27] UN OHCHR, 'United Nations guidance note on the protection and promotion of civic space', September 2020.

[28] Council of Europe: Committee of Ministers, Recommendation CM/Rec(2018)11 of the Committee of Ministers to Member States on the need to strengthen the protection and promotion of civil society space in Europe, 28 November 2018, Appendix I, points (b) and (c).

[29] Judgment of the Court of Justice of 18 June 2020, Commission v Hungary, C-78/18, ECLI:EU:C:2020:476, paragraph 106.

[30] ECtHR, 20 October 2005, Ouranio Toxo and Others v. Greece, ECLI:CE:ECHR:2005:1020JUD007498901, § 37.

[31] FRA (2025), Better Legislation – Human rights impact assessments in lawmaking, 8 December 2025.

[32] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, p. 28

[33] ECtHR, 1 April 2025, Harutyunyan and Others v. Armenia, ECLI:CE:ECHR:2025:0401DEC004540115, §§ 30 to 38.

[34] Council of Europe, Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights), Rome, 4 November 1950, Article 11(2).

[35] Council of Europe / European Court of Human Rights, Guide on the case-law of the European Convention on Human Rights – Mass protests, 31 August 2025, paragraphs 99 to 108.

[36] Venice Commission and OSCE/ODIHR, Guidelines on Freedom of Peaceful Assembly – 3rd edition, Strasbourg/Warsaw, 15 July 2020.

[37] ECtHR, 7 December 1976, Handyside v. The United Kingdom, ECLI:CE:ECHR:1976:1207JUD000549372, § 49.

[38] ECtHR, 16 April 2025, Bodson and Others v. Belgium, ECLI:CE:ECHR:2025:0116JUD003583422, § 81.

[39] ECtHR, 7 January 2009, Eva Molnar v. Hungary, ECLI:CE:ECHR:2008:1007JUD001034605, § 34.

[40] Forst, M. (UN Special Rapporteur on Environmental Defenders under the Aarhus Convention), State Repression of Environmental Protest and Civil Disobedience: A major threat to human rights and democracy, February 2024.

[41] Forst, M. (UN Special Rapporteur on Environmental Defenders under the Aarhus Convention), Guidelines on the right to peaceful environmental protest and civil disobedience, October 2025.

[42] Forst, M. (UN Special Rapporteur on Environmental Defenders under the Aarhus Convention), State Repression of Environmental Protest and Civil Disobedience: A major threat to human rights and democracy, February 2024; Robson, M. and Calder, E., 'How states use criminalisation to target land and environmental defenders', Global Witness, 6 January 2026 (23 October 2025); Hughes, R. A., 'European governments are using "harsh, overly broad" laws to silence climate protesters', Euronews, 11 September 2024; Amnesty International, Under Protected and Over Restricted: The state of the right to protest in 21 European countries, 8 July 2024; Stankiewicz ,T. and Lakhdhir, L., On Thin Ice – Disproportionate responses to climate change protesters in democratic countries, Climate Rights International, September 2024; Walker, I., 'Freedom of expression: Climate protestors singled out by legislative changes', International Bar Association, 17 October 2024; Hughes, R. A., 'European governments are using "harsh, overly broad" laws to silence climate protesters', Euronews, 11 September 2024.

[43] For instance, in Germany: von Billerbeck, J., 'An update on developments regarding civic space in the EU and an overview of the possibilities for human rights defenders to enter EU territory', FRA, 2022, p. 3; in the Netherlands: Stankiewicz ,T. and Lakhdhir, L., On Thin Ice – Disproportionate responses to climate change protesters in democratic countries, Climate Rights International, September 2024; in Poland: National Federation of Polish NGOs (Ogólnopolska Federacja Organizacji Pozarządowych), Batory Foundation and the Legal Clinics Foundation (Fundacja Uniwersyteckich Poradni Prawnych), Civic Space Report 2025 – Poland, European Civic Forum, June 2025, p. 15

[44] For instance, in Germany and France. See Stankiewicz ,T. and Lakhdhir, L., On Thin Ice – Disproportionate responses to climate change protesters in democratic countries, Climate Rights International, September 2024; Dejean de la Bâtie, A. and Okunrobo Perez, S, 'Labelling activists as terrorists: The securitisation of peaceful protest in Europe', International Journal for the Semiotics of Law, Springer Nature, February 2026.

[45] See, for instance, in Germany (court case pending as of November 2025): Stankiewicz ,T. and Lakhdhir, L., On Thin Ice – Disproportionate responses to climate change protesters in democratic countries, Climate Rights International, September 2024; Hughes, R. A., 'European governments are using "harsh, overly broad" laws to silence climate protesters', Euronews, 11 September 2024; Gayle, D., 'Alarm as German climate activists charged with "forming a criminal organisation"', The Guardian, 23 May 2024; Article 19, 'Europe: Urgent need to protect the right to protest', 1 July 2024; Marandi, N. A., 'As Europe heats up, silencing climate activists is emerging as a troubling trend', EU Observer, Human Rights Watch, 22 July 2024.

[46] For instance, in France and in Italy: Dejean de la Bâtie, A. and Okunrobo Perez, S, 'Labelling activists as terrorists: The securitisation of peaceful protest in Europe', International Journal for the Semiotics of Law, Springer Nature, February 2026; Walker, I., 'Freedom of expression: Climate protestors singled out by legislative changes', International Bar Association, 17 October 2024; Civic Space Watch, 'Italy: Security law enacted in June 2025, but its measures were already applied before approval', European Civic Forum, 14 July 2025; UN OHCHR, 'Italy: UN experts concerned by administrative enactment of problematic security bill', 14 April 2025.

[47] ECtHR, 30 May 2013, Malofeyeva v. Russia, ECLI:CE:ECHR:2013:0530JUD003667304, § 136; ECtHR, 27 November2012, Disk and Kesk v. Turkey, ECLI:CE:ECHR:2012:1127JUD003867608, § 29.

[48] ECtHR, 24 October 2024, Eckert v. France, ECLI:CE:ECHR:2024:1024JUD005627021, §§ 67 to 72.

[49] Council of Europe / European Court of Human Rights, Guide on the case-law of the European Convention on Human Rights – Mass protests, 31 August 2025, p. 17, with reference to ECtHR, 5 September 2022, Ekram Can and Others v. Turkey, ECLI:CE:ECHR:2022:0308JUD001061310, § 92, and ECtHR, 11 August 2023, Chkhartishvili v. Georgia, ECLI:CE:ECHR:2023:0511JUD003134920, § 60.

[50] Civicus, 'Solidarity protests with Palestinian people banned in at least 12 EU countries', 4 April 2024, with the article citing Austria, Bulgaria, Czechia, Estonia, Finland, France, Germany, Hungary, Italy, Latvia, Poland and Sweden; European Civic Forum, Horizontal Rule of Law Submission – Repeated restrictions on Palestine solidarity, Brussels, April 2024; Guevara-Rosas, E., 'Europe: Stop punishing Palestinian solidarity and start punishing those who commit genocide', Amnesty International, 15 February 2025; UN OHCHR, 'UN experts urge Germany to halt criminalisation and police violence against Palestinian solidarity activism', 16 October 2025.

[51] O'Flaherty, M. (Council of Europe Commissioner for Human Rights), Letter of the Commissioner to Germany's Federal Minister of the Interior on restrictions to the freedoms of expression and of peaceful assembly, Strasbourg, 6 June 2025.

[52] Council Framework Decision 2008/913/JHA of 28 November 2008 on combating certain forms and expressions of racism and xenophobia by means of criminal law (OJ L 328, 6.12.2008, pp. 55–58, ELI: http://data.europa.eu/eli/dec_framw/2008/913/oj), Article 1.

[53] German Federal Association of Research and Information Centres on Anti-Semitism (Bundesverband der Recherche- und Informationsstellen Antisemitismus), 'RIAS-Publikation zeigt die Dimensionen von Antisemitismus seit dem 7. Oktober auf' ['RIAS publication highlights the extent of antisemitism since 7 October'], 6 October 2025.

[54] Civicus, 'Serbia', Civicus website, 9 December 2025.

[55] See for instance: Amnesty International, 'Hungary: Let pride march freely', 16 April 2025; FRA, 'FRA statement on recent developments affecting civil society and fundamental rights', 29 May 2025; The Associated Press, 'Bulgaria's law against LGBTQ+ "propaganda" in schools spark protests', Euronews, 9 August 2024; The Sofia Globe staff, 'Sofia pride 2025: "We are people, not propaganda"', The Sofia Globe, 14 June 2025

[56] Action brought on 19 December 2022, European Commission v Hungary, C-769/22, OJ C 54, 13.2.2023, p. 16.

[57] European Center for Not-for-Profit Law (ECNL), 'ECNL, Hungarian Civil Liberties Union, EDRI, Liberties and nearly 50 CSOs urge the European Commission to protect fundamental rights in Hungary', 24 June 2024; Amnesty International, 'Banning the rainbow – How Hungarian authorities banned the upcoming PécsPride and what the EU should do about it', 1 October 2025.

[58] Hungary: Amnesty International, 'Hungary: "World is watching" as tens of thousands prepare to march in defiance of attempted ban on Budapest Pride', 24 June 2025; De Groot, D., 'Hungary's ban on pride', European Parliament: Directorate-General for Parliamentary Research and Services, 3 April 2025.

[59] ECtHR, 11 April 2011, Case of Alekseyev v. Russia, ECLI:CE:ECHR:2010:1021JUD000491607.

[60] ECtHR, 13 November 2017, Bayev and Others v. Russia, ECLI:CE:ECHR:2017:0620JUD006766709, §§ 66 to 69, 83 and 84.

[61] Council of Europe: Parliamentary Assembly, 'Freedom of expression and assembly of LGBTI people in Europe', 27 March 2024.

[62] See for instance: Civil Society Europe, Joint civil society contribution on civic space to the 2024 annual Rule of Law Report, Brussels, 2024; Civic Champions, Comparative report on the state of civil society in Bulgaria, Cyprus, Greece and Italy, 2025.

[63] Expert Council on NGO Law of the Conference of INGOs of the Council of Europe, 'Opinion on the compatibility with European Standards of recent and planned amendments to the Greek legislation on NGO registration', 2 July 2020; Aegean NGO Network, 'Monitoring closed controlled facilities on the Greek islands', 22 October 2025; Aegean NGO Network, 'Greece to deliver another blow to independent NGO services and monitoring', 11 September 2025.

[64] Information provided by email to FRA via its national liaison officer on 23 January 2026.

[65] Amnesty International, 'Cyprus: Halt the dissolution of leading anti-racism organization', 3 March 2021; KISA (Movement for Equality, Support, Anti-Racism), 'Cyprus: KISA's deregistration is illegal according to the Supreme Constitution Court – A new blow to the government's attacks on freedom of expression!', 27 October 2025.

[66] FRA, Search and rescue (SAR) operations in the Mediterranean and fundamental rights – June 2025 update, Publications Office of the European Union, Luxembourg, 20 June 2025, Annex: Legal proceedings by EU Member States against civil society actors involved in search and rescue (SAR) operations in the Mediterranean Sea (Update June 2025); Platform for International Cooperation on Undocumented Migrants, Criminalisation of Migration and Solidarity in the EU – 2024 report, pp. 15–16; European Center for Constitutional and Human Rights, 'Acquittal for sea rescuers of the Iuventa', 19 April 2024; Amnesty International, 'Italy: "New hope" as prosecutor recognizes that charges against the Iuventa crew should be dropped', 28 February 2024; Zampano, G., 'Italian court drops charges against migrant rescue ship crews and ends long-running legal battle', The Associated Press, 19 April 2024; InfoMigrants, 'Italian court drops charges against crew members of migrant rescue ships', 19 April 2024.

[67] Platform for International Cooperation on Undocumented Migrants, Criminalisation of Migration and Solidarity in the EU – 2024 report, pp. 15–16; International Commission of Jurists, 'Greece: Criminalization of humanitarian support to migrants and refugees must end', 10 June 2023; Expert Council on NGO Law of the Conference of INGOs of the Council of Europe, 'Civil society support to refugees and other migrants in Europe: The need to end the backlash on civil society space', 21 June 2024, p. 17; Amnesty International, Greece – Submission to the UN Human Rights Committee – 142nd session, 14 October–7 November 2024, September 2024, p. 11; The Associated Press, 'Greek court acquits aid workers who helped rescue migrants crossing in small boats', Euronews, 31 January 2024; Frontline Defenders, 'Espionage charges against Seán Binder and 23 other Human Rights Defenders were annulled', January 2023.

[68] Such as the right of access to public documents (Article 42), the right to good administration (Article 41), the right to participate in local and European elections (Articles 39 and 40) or the right to petition the European Parliament (Article 44).

[69] Judgment of the Court of Justice of 18 June 2020, Commission v Hungary, C-78/18, ECLI:EU:C:2020:476, paragraph 113; ECtHR, 20 October 2005, Ouranio Toxo and Others v. Greece, ECLI:CE:ECHR:2005:1020JUD007498901, §§ 35 to 37.

[70] ECtHR, 9 December 2025, Ilareva and Others v. Bulgaria, ECLI:CE:ECHR:2025:0909JUD002472917, § 145.

[71] Council of the European Union, 'Council Conclusions on the application of the EU Charter of Fundamental Rights; The role of the civic space in protecting and promoting fundamental rights in the EU', 7388/23, 14 March 2023, paragraph 14.

[72] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025, pp. 8–9.

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

[74] European Commission, 'Citizens, Equality, Rights and Values programme overview', European Commission website

[75] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025, p. 11.

[76] FRA, 'An update on developments regarding civic space in the EU and an overview of the possibilities for human rights defenders to enter EU territory 2022 – Country research', FRA website, 5 July 2023; FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025; European Civic Forum, 'Civic Space Watch', European Civic Forum website; Civicus, 'Monitor tracking civic space', Civicus website.

[77] For more details on SLAPPs, see The Daphne Caruana Galizia Foundation, SLAPPs in Europe: Mapping trends and cases, The Coalition Against SLAPPs in Europe, 9 December 2024.

[78] FRA, 'Civic space', FRA website.

[79] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, pp. 16–17.

[80] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, p. 19.

[81] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, p. 20.

[82] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, p. 21.

[83] FRA, 'Strengthening democracy and policy implementation: EU funding for the work of civil society organisations – Contribution of the EU Agency for Fundamental Rights (FRA) to the consultation on the multiannual financial framework 2028–2034', 6 May 2025, pp. 20–25; European Civic Forum, 'Realising protection for human rights defenders and civil society organisations in Europe: Pathways towards and effective protection ecosystem', October 2024; European Civic Forum, 'Realising protection for human rights defenders and civil society organisations in Europe – Mapping paper', October 2024.

[84] For details see FRA, 'Strengthening democracy and policy implementation: EU funding for the work of civil society organisations – Contribution of the EU Agency for Fundamental Rights (FRA) to the consultation on the multiannual financial framework 2028–2034', 6 May 2025, p. 1

[85] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, p. 26

[86] European Commission: Directorate-General for Justice and Consumers, Civil Society Landscape in the European Union – Research in support of the citizens, equality, rights and values (CERV) programme, Publications Office of the European Union, Luxembourg, 2023, p. 21.

[87] Judgment of the Court of Justice of 18 June 2020, Commission v Hungary, C-78/18, ECLI:EU:C:2020:476, paragraph 114.

[88] Venice Commission and OSCE/ODIHR, Joint Guidelines on Freedom of Association, Strasbourg/Warsaw, 17 December 2014; Kiai, M. (UN Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association), 'Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, Maina Kiai', 24 April 2013, Part III (Ability of associations to access financial resources: a vital part of the right to freedom of association); See also UN General Assembly, 'Resolution adopted by the General Assembly – Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms', A/RES/53/144, 8 March 1999, Article 13.

[89] Council of the European Union, 'Council Conclusions on the application of the EU Charter of Fundamental Rights; The role of the civic space in protecting and promoting fundamental rights in the EU', 7388/23, 14 March 2023

[90] See for instance: FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025; European Commission: Directorate-General for Communications Networks, Content and Technology, 'Shedding light on quality of proposals', European Commission website, 12 May 2023

[91] Ward, B., 'Creeping civil society curbs in Europe threaten rights in 2023', euobserver, 4 January 2023; European Fundraising Association, 'EU anti-money laundering & counter-terrorism financing policy & its impact on civil society', 28 June 2023; ECNL, 'Unpacking the EU AML/CFT Package: Key insights and implications for the non-profit sector', ECNL website, 18 March 2025; Meester, E., 'New EU rules threaten the future of crowdfunding – and civil society', Alliance, Alliance Publishing, 12 August 2025.

[92] See for instance, Ward, B., 'Creeping civil society curbs in Europe threaten rights in 2023', euobserver, 4 January 2023; ECNL, 'Data protection & access to resources: CSOs at the intersection', ECNL website, 25 January 2018; Savage, J., 'Defending civic space against "Foreign Agent" laws: How should donors respond?', European Democracy Hub, 13 November 2024

[93] ECNL, 'Do CSOs have a right to funding in times of emergency?', ECNL website, 4 June 2020; Simon, E., 'We Need More Clarity on the Definition of Political Advertisement', Civil Liberties Union for Europe, 26 February 2025; see, for instance, the case of Amnesty International Ireland: Amnesty International, 'Amnesty welcomes quashing of Sipo's decision on OSF grant', 31 July 2018.

[94] Irish Council for Civil Liberties, "That's not your role" – State funding and advocacy in the Irish community voluntary and non-profit sector, 1 May 2024, p. 33.

[95] Evans, K. H-M., 'Regulating political activities of non-governmental organisations', Expert Council on NGO Law of the Conference of INGOs of the Council of Europe, December 2013; Poppe, A. E. and Wolff, J., 'Germany sets a poor example: The case of ATTA in light of globally closing civic spaces', Center for Strategic and International Studies, 17 July 2017; Attac Germany, 'Zehn Jahre ohne Gemeinnützigkeit: Attac kämpft weiter!' ['Ten years without charitable status: Attac continues to fight!'], 10 April 2024; Allianz Rechtssicherheit für politische Willensbildung, 'ZiviZ-Survey: 30.000 Vereine verstummen wegen zu engem Gemeinnützigkeitsrecht' ['ZiviZ-Survey: 30 000 associations fall silent due to overly restrictive charity law'], 7 March 2023; Council on Foundations, 'Nonprofit law in Hungary – Country notes', November 2024.

[96] Council of Europe, 'Venice Commission on Hungarian law on foreign-funded NGOs: Legitimate aims, but excessive obligations, disproportionate sanctions', 2 June 2017.

[97] See Judgment of the Court of Justice of 18 June 2020, Commission v Hungary, C-78/18, ECLI:EU:C:2020:476.

[98] Article 11 ECtHR.

[99] Civic Space Watch, 'Slovakia: NGO draft law stigmatises CSOs, mirroring Hungary's path', European Civic Forum, 13 June 2024; OGP, 'Slovak Republic action plan review 2024–2026', OGP website, 6 January 2025; Silenská, N., 'Slovak NGOs face new rules as chaotic bill clears parliament', Euractiv, 17 April 2025.

[100] Judgment of the Court of Justice of 18 June 2020, Commission v Hungary, C-78/18, ECLI:EU:C:2020:476.

[101] OSCE/ODIHR, 'Opinion on the draft act on the registration of foreign agents (as of 11 November 2024) in Bulgaria', 30 May 2025; Hegedüs, D., 'Anti-foreign NGO laws: A tool to repress civil society', German Marshall Fund, 9 September 2025.

[102] Saris, L., 'Guarding the foundations: EU civil society in a changing geopolitical landscape', European Policy Centre, 11 March 2025; Heinrich Boell Stiftung, 'Drowning in disinformation – How homegrown state-sponsored disinformation threatens EU democracy'; The Good Lobby, 'EU boosts party transparency while targeting NGOs', 24 June 2025

[103] Expert Council on NGO Law of the Conference of INGOs of the Council of Europe and Golubović, D., 'Stigmatisation of non-governmental organisations in Europe', 20 March 2024; Skrivervik, C., ECA report: No scandal – but the Commission needs to invest in a more understandable database', European Environmental Bureau, 7 April 2025; FRA, 'Civic space', FRA website; Hummel, S., 'Das Anti-NGO-Narrativ: Wie versucht wird, die Zivilgesellschaft zu delegitimieren' ['The anti-NGO narrative: How civil society is being delegitimised'], Maecenata, 10 September 2025.

[104] Robinson, N., Foreign Influence Registration Laws and Civil Society: An analysis and responses , International Center for Not-for-Profit Law, April 2024 (updated January 2025); ECNL, 'FATF warning against restrictive legislation efforts – do not disrupt legitimate CSO activities!', ECNL website, 29 October 2021.

[105] Civil Society Europe, 'Fundamental rights must underpin the EU action plan to fight money laundering and terrorism financing', 27 August 2020.

[106] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, p. 12

[107] FRA, 'Summary of key findings from FRA's civic space consultation covering 2024', 25 September 2025, p. 12

[108] Fortuna, G. and Iraola Iribarren, M., 'EU Commission unlocks health funds but leaves civil society reeling from cuts', Euronews, 25 July 2025; Wall, M., 'Aid agency goal to lay off 30 % of staff due to funding cuts', The Irish Times, 29 March 2025.

[109] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025.

[110] OECD, 'Practical guide for policymakers on protecting and promoting civic space', OECD Public Governance Reviews, OECD Publishing, Paris, 2024.

[111] Albania: 2019–2023 roadmap on government policy for an enabling environment for civil society development; Bulgaria: Council of Ministers (Министерски съвет), 'Стратегия за подкрепа на развитието на гражданските организации в Република България за периода 2012–2015' ['Strategy for supporting the development of civil society organisations in the Republic of Bulgaria for the 2012–2015 period'], 5 September 2012; Croatia: Government of the Republic of Croatia, 'National strategy for the creation of an enabling environment for civil society development from 2012 to 2016', 12 July 2012.

[112] France: Ministry of Europe and Foreign Affairs (Ministère de l'Europe et des Affaires Étrangères), Strategic guidance paper 2023-2027 on civil society and civic engagement, June 2023; the Netherlands: Ministry of Foreign Affairs (Ministerie van Buitenlandse Zaken), 'Policy framework strengthening civil society', Government of the Netherlands website, 23 March 2022.

[113] Government of the Republic of Serbia, 'Strategija za stvaranje podsticajnog okruženja za razvoj civilnog društva u Republici Srbiji' ['Strategy for creating an enabling environment for the development of civil society in the Republic of Serbia for the period from 2022 to 2030'], Official Gazette of the Republic of Serbia, No 23/2022, 2 February 2022.

[114] Ministry of Human and Minority Rights and Social Dialogue, 'Избор чланова Савета – Министарство за људска и мањинска права и друштвени дијалог' ['The election of Council Members – Ministry of Human and Minority Rights and Social Dialogue'], Ministry of Human and Minority Rights and Social Dialogue website; Civic Initiatives, 'Otvoreno pismo Vladi Srbije organizacija civilnog društva: Vlast da prestane sa ugrožavanjem vladavine prava u sferi javnog informisanja' ['Open letter to the Government of Serbia from civil society organisations: The authorities must stop undermining the rule of law in the field of public information'], 25 March 2016; Center for Democracy Foundation, 'Members of the Council for Creating a Supportive Environment for Civil Society Development freeze Their membership due to threats to CSOs' work', 27 January 2025.

[115] Ministry of Justice (oikeusministeriö/justitieministeriet), CSO Strategy 2023–2027: Government resolution on

the development of civic space, Publications of the Ministry of Justice, Helsinki, 6 June 2024, p. 7.

[116] Ministry of Justice (oikeusministeriö/justitieministeriet), 'The civil society organisations strategy outlines the development of the operating conditions of non-governmental organisations', 6 June 2024.

[117] Cabinet of Ministers of the Republic of Latvia, 'Saliedētas un pilsoniski aktīvas sabiedrības attīstības plāns 2024.–2027. gadam' ['Development plan for a cohesive and civically active society 2024–2027'], Latvijas Vēstnesis, No 251, 17 December 2024.

[118] Plenipotentiary of the Government of the Slovak Republic for the Civil Society Development (Úrad splnomocnenca Vlády SR pre rozvoj občianskej spoločnosti), 'Koncepcia rozvoja občianskej spoločnosti na Slovensku na roky 2022–2030' ['Strategy of Civil Society Development in Slovakia for 2022-2030'].

[119] Government of the Republic of Croatia (Vlada Republike Hrvatske), 'National Plan for the protection and promotion of human rights and combatting discrimination for the period to 2027', 30 March 2023.

[120] Czechia: Office of the Government of the Czech Republic, 'Strategy for Cooperation between public administration and non-governmental non-profit organisations 2021–2030', June 2021.

[121] Ministry of culture of Sweden (Kulturdepartamentet), 'Regeringens strategi för det nationella arbetet med mänskliga rättigheter' ['Government's strategy for national human rights work'], Skr. 2016/17:29, 13 October 2016.

[122] Government of Ireland: Department of Rural and Community Development and the Cross Sectoral Group on Local and Community Development, Sustainable, Inclusive and Empowered Communities: A five-year strategy to support the community and voluntary sector in Ireland 2019–2024, 28 August 2019; Government of Ireland: Department of Rural and Community Development, National Volunteering Strategy 2021–2025, 5 December 2020.

[123] Malta Council for the Voluntary Sector and the Parliamentary Secretary for Youth, Sport and Voluntary Organisations, National Strategy on Volunteering – Moving towards 2025, 6 February 2020.

[124] OGP, 'Members', OGP website.

[125] OGP, 'How we work', OGP website.

[126] OGP, 'Multi-Stakeholder Forums', OGP website.

[127] Portal de la Transparencia, 'Foro de Gobierno Abierto', Portal de la Transparencia website.

[128] Interministerial Directorate for Government Transformation (Direction interministérielle de la transformation publique), France's 2024–2026 National Action Plan, December 2023.

[129] Information received from the national liaison officer for Ireland.

[130] Ministry of Justice (oikeusministeriö/justitieministeriet), 'Vapaa! - Fri! -hanke' ['Free! Project'], OM011:00/2021, 16 February 2021).

[131] National Foundation of Civil Society (Kodanikuühiskonna Sihtkapital), 'Roadmap for CSOs' ('Teejuht vabaühendustele'), National Foundation of Civil Society website.

[132] Government of the Netherlands (Rijksoverheid), 'Wetboek van Strafrecht' ['Criminal Code'], Overheid website,

1 January 2025, Article 285d.

[133] Pessoas 2030, 'People 2030', Pessoas 2030 website.

[134] Ministry of Justice (oikeusministeriö/justitieministeriet), CSO Strategy 2023–2027: Government resolution on the development of civic space, Publications of the Ministry of Justice, Helsinki, 6 June 2024.

[135] Cabinet of Ministers of the Republic of Latvia, 'Saliedētas un pilsoniski aktīvas sabiedrības attīstības plāns 2024.–2027. gadam' ['Development plan for a cohesive and civically active society 2024–2027'], Latvijas Vēstnesis, No 251, 17 December 2024.

[136] Ministry of Finance and Economy of Albania, Instruction No 27 of 13 September 2023, Official Gazette of the Republic of Albania, No 137; Commission staff working document – Albania 2024 report – Accompanying the document 'Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – 2024 communication on EU enlargement policy', SWD(2024) 690 final of 30 October 2024.

[137] National Revenue Agency of Italy (Agenzia delle Entrate), 'Elenco complessivo degli enti ammessi in una o più categorie di beneficiari' ['Overall list of organisations admitted in one or more beneficiary categories'], Agenzia delle Entrate website.

[138] National Assembly of the Republic of Slovenia, 'Zakon o nevladnih organizacijah' ['Act on non-governmental organisations'], Legal Information System of the Republic of Slovenia, 20 March 2018; Chancellory of the Sejm of the Republic of Poland (Kancelaria Sejmu), 'Ustawa z dnia 26 lipca 1991 r. O podatku dochodowym od osób fizycznych' ['Act of 26 July 1991 regarding income tax from a natural person'], Article 45c.

[139] OGP, 'Civic Space Lab', OGP website.

[140] Ombudswoman of the Republic of Croatia (Pučka pravobraniteljica Republike Hrvatske), Izvješće pučke pravobraniteljice – Analiza stanja ljudskih prava u Hrvatskoj 2021 [Report of the Ombudswoman – Analysis of the state of human rights and equality in Croatia 2021], March 2022.

[141] Spain, National Ombudsman (Defensor del Pueblo) (2024), 2023 National Report (Informe Anual 2023), Defensor del Pueblo.

[142] FRA, 'National human rights structures', National human rights structures navigator.

[143] Danish Institute for Human Rights, 'Furthering the right to defend rights', Danish Institute for Human Rights website.

[144] ENNHRI, State of the Rule of Law in the EU Enlargement Countries: Reports from national human rights institutions in 2025, September 2023; ENNHRI, 'State of the rule of law in Europe 2025', ENNHRI website.

[145] Civicus, 'How it works', Civicus website.

[146] BCSDN, 'Monitoring Matrix Reports', BCSDN website.

[147] Civil Liberties Union for Europe, Liberties Rule of Law Report 2025, 17 March 2025.

[148] European Civic Forum and Civic Space Watch, Civic Space Report 2025, June 2025.

[149] ECNL, 'MACS – Monitoring Action for Civic Space', ECNL website.

[150] European Centre of Studies and Initiatives (Centro Studi ed Iniziative Europeo), 'CivicChampions – Empowering civil society organisations and activists championing human rights and democratic values in the EU', European Centre of Studies and Initiatives website.

[151] European Network of Cities and Regions for the Social Economy, 'B.RIGHT SPACES', European Network of Cities and Regions for the Social Economy website.

[152] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – 2025 rule of law report – The rule of law situation in the European Union, COM(2025) 900 final of 8 July 2025, p. 7.

[153] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – 2025 rule of law report – The rule of law situation in the European Union, COM(2025) 900 final of 8 July 2025.

[154] National Resource Centre for Civil Society in Albania.

[155] Fondazione Giangiacomo Feltrinelli, #iomiattivo – Fai sentire la tua voce in 5 mosse [#iomiattivo – Make your voice heard in 5 moves], The Good Lobby, July 2023.

[156] Butler, I., 'New: Messaging guide For progressive civil society facing smear campaigns', Civil Liberties Union for Europe, 10 December 2021.

[157] Goodwin, B., 'European NGOs publish papers on a protection mechanism for human rights defenders and CSOs', European Civic Forum, 8 October 2024.

[158] Willamo, K., 'Net4Defenders – Project partners advance work on civic space and protection of human rights defenders', European Civic Forum, 26 February 2025.

[159] Cyprus Bar Association, The Associations and Foundations Acts of 1972 and 1997 (Οι περί Σωματείων και Ιδρυμάτων Νόμοι του 1972 και 1997).

[160] Democracy Festivals Association.

[161] United Nations: Office of the High Commissioner for Human Rights, CCPR General Comment No. 25: Article 25 (Participation in public affairs and the right to vote) – The right to participate in public affairs, voting rights and the right of equal access to public service, CCPR/C/21/Rev.1/Add.7, General Comment No. 25. (General Comments), 12 July 1996.

[162] Hämäläinen, H. and Salminen, J., 'Inclusive participation in law-making: Good governance or a constitutional obligation?', The Theory and Practice of Legislation, Vol. 13, Issue 2, Taylor & Francis Online, 2 June 2025, pp. 213-235.

[163] Recommendation of the Committee of Ministers to member States on deliberative democracy (adopted by the Committee of Ministers on 6 September 2023 at the 1 473rd meeting of the Ministers' Deputies).

[164] OECD, 'Recommendation of the Council on open government', OECD/LEGAL/0438, 14 December 2017.

[165] Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, Aarhus, Denmark, 25 June 1998.

[166] Hämäläinen, H. and Salminen, J., 'Inclusive participation in law-making: Good governance or a constitutional obligation?', The Theory and Practice of Legislation, Vol. 13, Issue 2, Taylor & Francis Online, 2 June 2025, pp. 213-235, page 3; European Law Institute, Charter of fundamental constitutional principles of a European democracy, 22 July 2024, Principle 20.

[167] Council of Europe, 'Guidelines for civil participation in political decision making', CM(2017)83 final of 27 September 2017.

[168] Such as: the EU Roma strategic framework for equality, inclusion and participation (2020–2030); the LGBTIQ+ equality strategy (2020–2025 and 2026–2030); the gender equality strategy 2020–2025; A Union of equality: EU anti-racism action plan 2020–2025; the European Green Deal and EU adaptation strategy; or the strategy for the rights of persons with disabilities 2021–2030.

[169] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025.

[170] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee Of The Regions – EU strategy for civil society, COM(2025) 790 final of 12 November 2025, p. 3.

[171] European Economic and Social Committee.

[172] European Commission, 'Have your say', Public Consultations and Feedback website.

[173] European Commission, 'Citizens' Engagement Platform', European Commission website.

[174] European Commission, 'Citizens' Panels', Citizens' Engagement Platform.

[175] FRA, 'Civic space', FRA website.

[176] European Commission, 'A thriving civic space to protect fundamental rights', European Commission website; European Parliament, 'Report on human rights and democracy in the world and the European Union's policy on the matter – Annual report 2023', 8 December 2023; European Partnership for Democracy, 'Safeguarding civic space: Recommendations for an EU civil society strategy', October 2025.

[177] FRA, Protecting Civil Society – Update 2023, Publications Office of the European Union, Luxembourg, 18 October 2023, Section 5.2.

[178] Commission Recommendation (EU) 2023/2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes (OJ L, 2023/2836, 20.12.2023, ELI: http://data.europa.eu/eli/reco/2023/2836/oj), points 5 to 7.

[179] FRA, Fundamental rights report – 2024, Publications Office of the European Union, Luxembourg, 2024, p. 71.

[180] Assembly of the Portuguese Republic (Assembleia da República), Regimento da Assembleia da República nº

21/2020 [Rules of Procedure of the Parliament nº 21/2020], 31 August 2020.

[181] French Labour Code (Code de travail), Article L1.

[182] Interministerial Directorate for Government Transformation (Direction interministérielle de la transformation publique), Guide du Centre Interministériel de la Participation Citoyenne [Guide of the Interministerial Centre for Citizen Participation], 2024.

[183] Berek, M., Frączak, P, Izdebski, K, Kopińska, G. and Wołejko, P., Polski Bezład Legislacyjny – Raport Obywatelskiego Forum Legislacji z prac IX kadencji Sejmu [Polish Legislative Disorder: Report of the Civic Legislative Forum on the work of the 9th term of the Sejm], Batory Foundation, Warsaw, 2023.

[184] Austrian Parliament (Parlament Österreich), 'Begutachtungsverfahren' ['Consultative procedures'], Parlament Österreich website.

[185] Commission staff working document – 2024 rule of law report – Country chapter on the rule of law situation in Romania – Accompanying the document 'Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – 2024 rule of law report – the rule of law situation in the European Union', SWD(2024) 823 final of 24 July 2024.

[186] Centre for Peace Studies (Centar za mirovne studije), 'Liberties Rule of Law Report 2025 – Croatia', Liberties Rule of Law Report 2025, Civil Liberties Union for Europe, 17 March 2025.

[187] Raoul Wallenberg Institute of Human Rights and Humanitarian Law, Civic space in the EU: Mapping of national approaches to civic space monitoring, participation and protection: Sweden, February 2025, published on FRA's website, p.7.

[188] Fundamental Rights Research Centre (FRC), Vrije Universiteit Brussels (VUB), Civic space in the EU: Mapping of national approaches to civic space monitoring, participation and protection: Belgium, February 2025, published on FRA's website, with reference to information obtained via written communication from a member of the Human Rights League received on 14 January 2025 and confirmed in a written communication from a member of the Federal Institute received on 13 February 2025, p.5.

[189] German Institute for Human Rights, Civic space in the EU: Mapping of national approaches to civic space monitoring, participation and protection: Germany, February 2025, published on FRA's website, p. 5.

[190] Council of Europe (2017), 'Guidelines for civil participation in political decision making', CM(2017)83 final of 27 September 2017.

[191] OECD, 'OECD guidelines for citizen participation processes', OECD Public Governance Reviews, OECD Publishing, Paris, 24 September 2022.

[192] OSCE/ODIHR (2015), 'Recommendations on enhancing the participation of associations in public decision-making processes', Vienna, 15–16 April 2015.

[193] OSCE/ODIHR, Guidelines on promoting the political participation of persons with disabilities, 2019.

[194] Commission Recommendation (EU) 2023/2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes (OJ L, 2023/2836, 20.12.2023, ELI: http://data.europa.eu/eli/reco/2023/2836/oj), Recital 9; OECD, 'OECD guidelines for

citizen participation processes', OECD Public Governance Reviews, OECD Publishing, Paris, 24 September 2022, page 51.

[195] Government of the Netherlands (Rijksoverheid), 'Internetconsultatie' ['Internet consultation'], Overheid website.

[196] Decidim.

[197] Eelnõude infosüsteem.

[198] Commission Recommendation (EU) 2023/2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes (OJ L, 2023/2836, 20.12.2023, ELI: http://data.europa.eu/eli/reco/2023/2836/oj), points 15 to 17.

[199] University of Nicosia and Symfiliosi, Civic space in the EU: Mapping of national approaches to civic space monitoring, participation and protection: Cyprus, February 2025, published on FRA's website; Tallinn University, Civic space in the EU: Mapping of national approaches to civic space monitoring, participation and protection: Estonia, February 2025, published on FRA's website.

[200] Economic, Social and Environmental Council (Conseil économique, social et environnemental).

[201] Government of the Netherlands (Rijksoverheid), 'Wet op de Sociaal-economische Raad' ['Socioeconomic Council Act'], Overheid website, 6 February 1950.

[202] Economic and Social Council of Romania.

[203] National Office for Dialogue and Consultation between the Government and Civil Society, 'NOD in English', NOD website.

[204] Centre for Peace Studies, 'Liberties Rule of Law Report 2025 – Croatia', Liberties Rule of Law Report 2025, Civil Liberties Union for Europe, 17 March 2025.

[205] German Bundestag (Deutscher Bundestag), 'Kinderkommission – Kommission zur Wahrnehmung der Belange der Kinder' ['Children's Commission – Commission for the Protection of Childrens' Interests'], Deutscher Bundestag website; information received from the national liaison officer for Germany.

[206] Chancellory of the Sejm of the Republic of Poland (Kancelaria Sejmu), 'Ustawa o działalności pożytku publicznego I wolontariacie' ['Act on Public Benefit Activity and Volunteerism'], 24 April 2003, Article 41.

[207] Government of the Republic of North Macedonia, 'Закон за младинско учество и младински политики' ['Law on youth participation and youth policies'], Official Gazette of the Republic of North Macedonia, No 10, January 2020.

[208] Assembly of the Portuguese Republic (Assembleia da República), Lei 1/2006, que estabelece o Estatuto Jurídico do Conselho Nacional de Juventude (Law 1/2006, establishing the legal statute of the National Youth Council), Diário da República, No 10/2006, 13 January 2006.

[209] The Danish Ministry of Climate, Energy and Utilities (Klima-, Energi- og Forsyningsministeriet), 'Ungeklimarådet' ['Youth Climate Council'], Klima-, Energi- og Forsyningsministeriet website.

[210] For example, Government of the Republic of Croatia (Vlada Republike Hrvatske), Decision on the

establishment of the Council for Human Rights (Odluka o osnivanju Savjeta za ljudska prava), Official Gazette (Narodne novine) No 136/2021; Maltese Human Rights Directorate, LGBTIQ Consultative Council; Latvian Consultative Council of Representatives of Minority Non-Governmental Organisations (Mazākumtautību nevalstisko organizāciju pārstāvju konsultatīvā padome); Spanish Sustainable Development Council, Head of State (Jefatura del Estado), Law 40/2015 of 1 October on the Legal Regime of the Public Sector (Ley 40/2015, de 1 de octubre, de Régimen Jurídico del Sector Público), 2 October 2015, Article 22.3; Latvian Ministry of Welfare, Council for Senior Citizens (Senioru lietu padome); Portuguese National Education Council (Conselho Nacional de Educação); Bulgarian National Council for Integration of People with Disabilities (Национален съвет за интеграция на хората с увреждания, НСИХУ).

# About this publication

© European Union Agency for Fundamental Rights, 2026

Reproduction is authorised provided the source is acknowledged.

For any use or reproduction of photos or other material that is not under the European Union Agency for Fundamental Rights copyright, permission must be sought directly from the copyright holders.

Neither the European Union Agency for Fundamental Rights nor any person acting on behalf of the Agency is responsible for the use that might be made of the following information.

Luxembourg: Publications Office of the European Union, 2026

**HTML**

- TK-01-25-013-EN-Q
- ISBN: 978-92-9489-633-9
- DOI: 10.2811/7762749

**PDF**

- TK-01-25-013-EN-N
- ISBN: 978-92-9489-634-6
- DOI: 10.2811/5081512

FRA – EUROPEAN UNION AGENCY FOR FUNDAMENTAL RIGHTS

Schwarzenbergplatz 11 – 1040 Vienna – Austria

T +43158030-0– F +43 158030-699

- Website
- LinkedIn
- Instagram
- Facebook
- YouTube
- X