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The Missing Piece: **Why Civic Space Must Be an EU Accession Priority**

Balkan Civil Society
Development Network

Executive Summary

The EU's approach to enlargement stands at a crossroads. While the rule of law and fundamental values remain core principles, civil society actors in the Western Balkans and Türkiye (WBT) – and within the EU itself – are facing growing restrictions, financial pressures, and political attacks. Governments are tightening control over public discourse, curbing civic engagement, and passing restrictive laws that mirror authoritarian tactics. While the EU and international donors acknowledge civil society's role in democratic governance, existing mechanisms remain largely reactive, offering limited long-term support and inconsistent protections. As a result, civic space in the region is shrinking, raising concerns about the inclusivity and democratic legitimacy of the enlargement process. Without a stronger EU response, civic space is at risk of collapse.

What is happening? The erosion of civic space is part of a global democratic backslide. Governments in the WBT are introducing laws that stigmatize foreign-funded organizations as “foreign agents”, recriminalize defamation, or obstruct media freedom, while largely excluding civil society from policymaking. Financial pressures and smear campaigns, including SLAPP lawsuits, harassment, and administrative barriers, are becoming a common tactic to silence activists and journalists. Protest rights are selectively restricted, critical speech suppressed, while public funding for CSOs remains scarce, opaque and politically controlled. As civic space shrinks, citizens lose trusted advocates who defend their rights, hold governments accountable, and ensure policies serve the public interest rather than political or private agendas.

So What? The implications of this trend extend beyond civil society; they threaten the credibility of the enlargement process itself. Without an active and independent civil society, genuine democratic reforms become unlikely. Governments continue to delay or dilute EU-required reforms while restricting civic actors who push for accountability. This erodes public trust in EU accession and allows illiberal forces to shape the process. If the EU fails to take a structured approach to defending civic space, it risks losing its integrity as a driver of democratic change. Rather than treating civic space as a secondary concern, the EU must institutionalize mechanisms that systematically safeguard and empower civil society.

What Next? The EU must make the protection of civic space a **binding** condition in the enlargement process. This means:

- **Setting clear civic space benchmarks** in the accession process, ensuring they are consistently enforced and applied in the assessment of the countries’ progress.
- **Enhancing participatory mechanisms** by formally integrating CSOs into reform monitoring and accession processes.
- **Strengthening CSO financial viability** through long-term, flexible core support for locally owned and led initiatives.
- **Holding governments accountable** by linking democratic backsliding to financial and political consequences.

If these steps are not taken, the WBT will continue to move toward an illiberal model, where democratic standards exist only on paper. The EU must act now to prevent further backsliding and ensure that enlargement remains an inclusive, democratic process. However, this requires moving beyond outdated conditionality tools that have often served as political roadblocks rather than genuine incentives for reform. Instead of further delaying enlargement, the EU should establish a structured, gradual integration process that reinforces civic space protections while allowing the region to move forward.

Introduction

The enlargement process in the region advanced in 2024, most notably in Montenegro and Albania. Montenegro received a positive rule of law assessment and closed three chapters—the first progress in seven years—while Albania opened two clusters in two months. Still, concerns remain over the lack of civil society benchmarks. Serbia stalled on Cluster 3, North Macedonia's process was decoupled from Albania due to Bulgaria's demands, Bosnia and Herzegovina's reforms lost momentum, and Kosovo's candidate status remained out of reach.

Meanwhile, geopolitical tensions—including transatlantic strains, NATO uncertainty, and unilateral U.S. actions on Ukraine—are reshaping Europe's security priorities. With growing pressure to increase defence spending, investments in democracy, civil society, and enlargement risk being sidelined, despite their role in long-term stability.

As the EU navigates critical political momentum for enlargement, the democratic resilience of candidate countries is being tested. While once seen as a technical, merit-based process, EU enlargement has become increasingly political, shaped by geopolitical shifts, domestic interests within the EU, and evolving security concerns. The lack of a structured approach that reinforces democratic safeguards has left the region for a while in limbo. Civil society, a key driver of reform, is increasingly under pressure, facing obstructions and political hostility. At the same time, EU's fragmented and reactive policies do little to prevent the erosion of civic space. **This policy brief highlights the challenges that civil society faces in the Western Balkans and Türkiye and discusses why a more structured and strategic EU approach to safeguarding civil society is urgently needed.**

This analysis draws on field research, policy monitoring, and consultations with CSOs, conducted in the framework of the **Monitoring Matrix** (MM). Developed by BCSDN in 2013, the MM is a comprehensive methodology designed to assess the enabling environment for CSOs in the Western Balkans and Türkiye against international standards, looking at the legal frameworks and their implementation in practice. It has been used as a reference for EC's own EU Guidelines for Civil Society Support in Enlargement Countries and has enabled BCSDN to build its evidence base for advocacy for more than ten years. The monitoring findings have been consistently used in the EC Enlargement package and in the Rule of Law report as of 2023. On national level, MM findings have been feeding national strategies for cooperation with and development of the sector and have directly supported the drafting of key laws.

While every effort has been made to present an objective and evidence-based assessment, limitations exist. The rapidly evolving nature of civic space restrictions means that certain developments may change beyond the scope of this paper. Additionally, while this research reflects perspectives from a broad range of civic actors, access to government decision-making processes remains limited. The findings and recommendations are independent of any institutional or donor influence, with the sole aim of informing EU policymakers and regional stakeholders on how to reinforce participatory mechanisms and hold governments accountable for democratic commitments.

FINDINGS

The EU's enlargement process is being undermined by a growing contradiction: while democratic governance remains a formal condition for accession, civic space across the Western Balkans and Türkiye is shrinking. Civil society, long recognized as an essential driver of reform and accountability, is being systematically weakened by political pressures, legal restrictions, and financial constraints. Governments across the region are employing legislative, administrative, and economic tools to curtail civic engagement, often borrowing tactics from authoritarian regimes.

This troubling trend is not confined to the region. Across Europe, far-right forces have intensified efforts to silence NGOs that challenge dominant political and economic interests. Across the globe, civil society faces an unprecedentedly hostile narrative, exacerbated by the sweeping U.S. Administration Executive Order freezing most U.S. foreign aid. Beyond the immediate financial disruption, this decision has become a political tool for those seeking to weaken civil society, independent media, and liberal values. The political ideology behind the Executive Order has provided a dangerous pretext for right-wing and nationalist actors worldwide to escalate attacks on civil society. On the other hand, the major funding gap exposed has left a void that is easily exploited by malign foreign influences seeking to undermine democratic development and civil society independence.

The current regional context is complex and volatile, with shrinking civic space and democratic backsliding posing a direct challenge to the EU's credibility and strategic interests. This is not just a test of the EU's enlargement policy—it is a defining moment for its role as a global defender of democracy and fundamental freedoms. The EU's failure to enforce political consequences when governments erode fundamental freedoms and to deliver on its commitments only fuels instability; governments of the accession countries claim to endorse democratic reforms while actively restricting the very actors essential for their monitoring and implementation. The closing of civic space undoubtedly deters the Enlargement process, eroding public trust in EU integration and diminishing the region's capacity for meaningful democratic transformation.

The Closing of Civic Space

Civil society in the Western Balkans and Türkiye operates in an environment that is only partially enabling for its operations and development, and a narrowing civic space, especially in Serbia, Bosnia and Herzegovina, and Türkiye. The shift from an enabling to a partially enabling environment is driven by the lack of effective implementation of the legally guaranteed rights and freedoms in practice, a framework that is not effective or stimulating enough to support the financial viability and sustainability of CSOs, and the deteriorating

relationship with the state. This regression is reflected in three key areas: **the erosion of fundamental freedoms, the growing financial instability of CSOs, and the weakening of institutional cooperation between civil society and the state**. Together, these challenges are not only restricting the ability of CSOs to operate independently but are also undermining their role in democratic governance and the EU integration process.

A Systematic Attack on Fundamental Freedoms

In recent years, civic actors in the Western Balkans and Türkiye have faced mounting obstacles that threaten their ability to function effectively.[1] While the region's countries legally guarantee the three fundamental freedoms—association, assembly, and expression—in line with international standards, the reality is far more complex in practice. Governments in the region are introducing laws and policies designed to stigmatize, control, or silence civil society organizations, particularly those advocating for transparency, rule of law, human rights, and media freedom.

In terms of **freedom of association**, long-expected changes in the main CSO laws in North Macedonia and Montenegro have stalled for over two years. Registration procedures have become complicated in Montenegro and extended in Kosovo, but they pose a major challenge for CSOs in Albania; the Albanian CSO electronic registration system has not been made functional yet, despite its original deadline being set for the end of 2023. While administrative hurdles make registering associations challenging, a far greater concern across the region is the growing stigma and hostile narratives surrounding CSOs. These narratives, often fueled by political rhetoric and media smear campaigns, increasingly discourage individuals and groups from organizing, advocating for change, or even formally associating, thus weakening civic engagement and the region's democratic fabric.

Reflecting a broader pattern of suppressing dissent, a key concern is the persistent attempt to introduce **"foreign agents" laws**, which seek to discredit CSOs receiving international funding by labelling them as serving foreign interests. In Republika Srpska, one of the entities in Bosnia and Herzegovina, a draft law aimed at placing foreign-funded organizations under very restrictive oversight is now back on the table, despite being previously withdrawn following international pressure. Similar narratives also continue to dominate political discourse in Serbia and Montenegro. While in Montenegro this has been an isolated issue with only an unofficial announcement of the right-wing party in the ruling coalition, in Serbia, ruling party officials have repeatedly called for legal measures to limit foreign funding for civil society, signalling an intent to restrict independent organizations further. Although these laws have not yet been enacted, their regular reappearance creates a climate of fear and uncertainty, discouraging civic engagement. In Türkiye, the proposed "agent of influence" legislation, if passed, would legitimize the ongoing abuse of legal frameworks to

[1] https://balkancsd.net/category/publications/monitoring-matrix-reports/

systematically target political opposition, essentially legalizing a state-sanctioned hunt against dissent.

The **use of legal harassment and Strategic Lawsuits Against Public Participation (SLAPP)** has also intensified, particularly in Türkiye, Serbia and Bosnia and Herzegovina, where journalists and activists face an increasing number of lawsuits aimed at exhausting their financial and psychological resources. In Serbia, investigative journalists uncovering corruption have been targeted by a wave of defamation lawsuits, often initiated by government officials or business figures close to political elites. These cases are not designed to win in court but to silence dissent through lengthy and costly legal battles. Similarly, in Bosnia and Herzegovina, the **criminalization of defamation** in Republika Srpska has created an environment where journalists can be prosecuted for critical reporting, further restricting freedom of expression. On a positive note, the Federation of Bosnia and Herzegovina has proposed a law with anti-SLAPP provisions to dismiss baseless lawsuits early and protect activists and journalists. The draft has passed the House of Representatives and awaits a vote in the House of Peoples.

CSOs across the Western Balkans face challenges under **anti-money laundering (AML) and countering financing of terrorism (CFT) measures**. Albania, North Macedonia, Serbia and Türkiye maintain high-risk classifications for CSOs, applying enhanced due diligence and limiting financial access. In 2024, Montenegro avoided grey-listing by recognizing NPOs as low-risk and clarifying that beneficial ownership pertains to executive directors. In Kosovo, on the other hand, the new Beneficial Owners Registry misclassifies CSO founders as beneficial owners, which will continue creating challenges, in addition to the restrictive cash donation rules, making it almost impossible to raise funds through in-person crowdfunding, and the incomplete sectoral risk assessment that started in 2019. CSOs in Kosovo are currently subject to extensive reporting requirements as reporting entities, but a new draft AML law proposes removing this classification, pending Assembly approval. Bosnia and Herzegovina also passed a law excluding CSOs as obliged reporting entities but continued to restrict their banking services indirectly.

In addition to the presented obstacles, in practice, **AML/CFT standards been misused** against CSOs in Serbia and Türkiye. Echoing the 2019 "List" case and the 2024 exposure of confidential financial data in Serbia, the Administration for the Prevention of Money Laundering (AMLU) requested confidential bank data on five NPO employees, citing AML/CFT provisions, in what appears to be a targeted effort against individuals and organizations critical of the government. In Türkiye, AML and CFT measures have led to more frequent audits, especially for rights-based CSOs and those with foreign funding, increasing bureaucratic burdens and pressure from authorities, but also deterring funders and limiting funding flows to CSOs.

Freedom of assembly is selectively suppressed, particularly when protests challenge government policies or expose corruption. BiH, Türkiye and Serbia report multiple incidents

of assembly restrictions, particularly targeting activists, LGBT+ groups, and political opposition. These incidents often involve intimidation, detentions, and physical confrontations, underscoring the lack of consistent protections for peaceful assembly. In Serbia, demonstrations against electoral irregularities and environmental degradation, including opposition to Rio Tinto's planned lithium mine, have been met with excessive police force and arbitrary detentions. The country has also witnessed some of the largest protests in decades following the tragic collapse of a railway station canopy in Novi Sad, which resulted in 15 fatalities. Led by students and supported by various civic groups, the protests called for transparency and accountability, yet the government responded with mass arrests, intimidation, and even violence by pro-government groups. The crackdown extended beyond national borders, further underscoring the severity of Serbia's democratic decline and the escalating restrictions on civic freedoms.

Meanwhile, government-backed protests are allowed to proceed unhindered, revealing the **selective nature of assembly restrictions**. In Republika Srpska, authorities cancelled peace campaign events that aimed to promote dialogue and reconciliation, demonstrating how political elites can manipulate security concerns to suppress independent civic initiatives. Similarly, the Serbian police banned the "Mirdita, Dobar Dan" festival, an event promoting regional dialogue and reconciliation, citing security concerns and potential threats from right-wing activists. In Türkiye, gatherings for LGBT+ and women's rights have been continuously, selectively, restricted.

The **hostile environment for civil society extends to the media**, with press freedom deteriorating across the region. Journalists covering corruption, organized crime, or government mismanagement face targeted harassment, both online and offline. In Montenegro, journalists have been physically attacked, while in North Macedonia, the reintroduction of state-sponsored advertising threatens to re-establish government influence over private media. In Serbia, new media laws passed in 2023 were presented as part of the country's EU reform commitments. However, these changes failed to address the systemic political interference in journalism, allowing government officials and affiliated businesses to maintain control over media narratives. In Kosovo, new regulations increasing state control over media outlets raise concerns about press independence. Political interference in the media is compounded by **digital harassment, smear campaigns, and online surveillance**, creating an environment where journalists are increasingly self-censoring to avoid retaliation.

Freedom of expression faces systemic threats across the region, particularly in Türkiye, Serbia, Bosnia and Herzegovina, and Albania. Intimidation of journalists and activists undermines freedom of expression and silences critical voices. Legal changes in the Criminal Codes in BiH and Serbia related to slander remain worrying and continue causing troubles in 2024. In its first year since the re-criminalization of defamation, Republika Srpska has recorded 130 charges filed under the contentious law, raising significant concerns about its chilling effect on free speech. In Türkiye, two closure lawsuits have been filed against CSOs,

including allegations of activities conflicting with laws or public morals, raising concerns about increased restrictions on civil society, the potential chilling effect on freedoms of association and expression.

Challenges to freedom of expression have increased in Türkiye, as the "Disinformation Law" has been actively used against the press and CSOs, including as a ground for many lawsuits, for informing the public of human rights violations. In North Macedonia changes to the law aimed to provide stronger protection for journalists, by equating attacks on journalists with attacks on public officials. While improvement in detection of perpetrators has been noted, the overall response to incidents has remained unsatisfactory, with investigations being often slow and ineffective and no indictments being issued against individuals responsible for attacks on journalists or activists. The high level of impunity for these attacks persisted, raising concerns about civic actors' safety.

The presence of government-organized non-governmental organizations (GONGOs) further complicates the landscape. These entities, often seen as extensions of governmental influence, have raised concerns about undermining independent civil society efforts, particularly in advocacy spaces for women's rights and LGBTQI+ rights. By promoting state-aligned narratives, GONGOs risk marginalizing genuine advocacy initiatives, while draining the public funding allocated to NGOs and allowing governments to create a false appearance of inclusive consultations while sidelining expert civil society voices.

Financial Viability and Sustainability of CSOs Under Risk

Across the region, CSOs are navigating a complex landscape of regulatory changes, bureaucratic inefficiencies, and financial uncertainties, posing substantial limitations on their operations and development. While some progress is noted in enhancing operational conditions for non-profits, significant hurdles in the tax framework, public funding reforms, and transparency remain.

The financial sustainability of CSOs remains fragile. Reliance on foreign funding is high, whereas **domestic funding sources remain limited** due to insufficient regulation and practical obstacles. North Macedonia and Serbia expect some progress with the proposed amendments to the Law on Donations and Sponsorships and the Law on Group Financing, respectively, but the fiscal and tax treatment of CSOs across the region remains **unclear and non-stimulating**. While a limited number of CSOs across the region generate profit from economic activities, restrictive fundraising laws in Türkiye further hinder CSOs' ability to collect donations.

Tax-related challenges are a recurring issue for CSOs in the region, especially in Albania, where the introduction of a 0% VAT policy for foreign-funded projects, while intended to streamline operations, has instead increased administrative burdens, raised operational costs

and hindered CSOs' work. Across the region, unclear guidelines and cumbersome procedures for tax incentives discourage corporate and individual giving, leaving CSOs underfunded.

Public funding for CSOs, an essential mechanism for sustaining independent civic actors, **remains opaque, inadequate, and politically controlled**. While all governments in the region claim to support civil society through public grants, these funds often favour ruling party-aligned organizations, sidelining watchdogs and rights-based CSOs. In Serbia, millions of euros allocated for civil society initiatives have been funnelled into organizations with no track record of civic engagement, raising concerns about phantom NGOs being used to divert resources away from genuine independent actors. In Bosnia and Herzegovina, attempts to reform public funding mechanisms have been stalled by entrenched political interests, ensuring that state resources continue to serve party-affiliated organizations rather than the broader civic sector. Reports of state funds being funnelled to politically aligned organizations are notable in Türkiye, too. Montenegro is the only country with a legally mandated 0.5% of the state budget for CSOs, yet allocations often fall short (e.g., 0.23% in 2023), undermining predictability and violating the Law on NGOs.

Finally, although **human capital** is vital for CSO sustainability, most countries lack legislative frameworks that actively encourage or impede volunteering and employment in the sector. Bosnia and Herzegovina and Serbia discuss civil sector unions, while Kosovo, Montenegro, and Albania advance volunteer engagement policies. Notable steps include Albania's draft law on voluntarism, which requires further refinement, Kosovo's ongoing volunteering policy development, and Montenegro's pledge within the Youth Strategy to introduce a volunteer registry and youth-focused initiatives. However, progress remains uneven, with instances like Bosnia and Herzegovina's labor law consultations excluding CSOs from official processes.

CSO-State (non)Cooperation and (non)Inclusive Participation

Over the years, the participation and meaningful involvement of civil society in public dialogue and policymaking processes in the Western Balkans and Türkiye have steadily declined, threatening to undermine democracy and restrict civil society's ability to advocate for social change. Strategic documents for civil society development and cooperation exist in all countries, yet their implementation is largely unsatisfactory and effective monitoring frameworks are missing.

Intersectoral cooperation and trust remain stagnant. In Montenegro and North Macedonia, **councils for state-CSO cooperation** have been non-functional for nearly three years. In Montenegro, efforts to reactivate the council have failed due to low CSO participation and a lack of trust in the council's efficacy. A significant deterrent has been the interpretation of anti-corruption laws, equating CSO representatives in working bodies with public officials, creating reporting and administrative burdens. In North Macedonia, CSOs have boycotted the Council since March 2022, but the new government has recently begun consultations to

reactivate it. In Serbia, the Council for Cooperation and Civil Society Development was established in 2023 after ten years in the making, yet it lacks dedicated resources and is vulnerable to political influence, jeopardizing its continuity and strategic direction.

Public participation in policymaking is also being undermined. While all governments in the Western Balkan and Türkiye maintain formal consultation mechanisms with civil society, these processes are often superficial, with civic input ignored in final decisions. Across the region, national consultations reveal common obstacles: insufficient timelines, restricted access to information, and inadequate feedback mechanisms. In Kosovo, which was once a regional leader in civic engagement, the exclusion of CSOs from key legislative processes reflects a growing trend of closing institutional space for public participation. Civil society across the WBT region is seldom recognized as a key actor with relevant data and insights into the beneficiaries targeted by specific legislation and is often included in consultations only as a formality.

Beyond national policymaking**, CSO involvement in working groups related to EU accession negotiations** remains inconsistent and largely symbolic. In Serbia, the National Convention on the EU provides a platform for civil society to engage in discussions on negotiation chapters, yet its influence is limited, as the government often disregards its recommendations. Similarly, in Albania, the Partnership Platform for EU Integration was designed to facilitate dialogue between civil society and institutions on EU-related reforms but remains largely underutilized, with low awareness and participation from both CSOs and public authorities. In Montenegro, the process of including civil society in the working groups for EU negotiation clusters has suffered due to rushed legislative changes during the EU interim benchmark process. Poorly managed consultations at both national and local levels resulted in low participation, with the EU's focus on benchmarks rather than inclusive processes reducing pressure on governments to engage CSOs.

What Does This Mean for EU Enlargement?

Risk of a Hollow Enlargement Process: The deterioration of civic space is not just a domestic issue for the Western Balkans and Türkiye; it is a direct challenge to the EU's enlargement strategy. Candidate governments pledge reforms while silencing dissent and weakening checks and balances. This contradiction weakens the credibility of the enlargement process, creating a situation where EU-driven reforms are implemented in form but not in substance.

The EU's failure to establish clear accountability measures for these violations has enabled governments to continue restricting civic space with little consequence. Despite ongoing financial assistance and reform incentives, illiberal governance practices remain entrenched. If this trajectory continues, the enlargement process risks becoming a purely technical

exercise, where governments adopt EU laws without embracing democratic principles in practice. Without genuine and systematic inclusion of civil society in EU-related policymaking, accession negotiations risk becoming a closed process dominated by government-driven narratives, rather than an inclusive effort that reflects the needs and concerns of society as a whole.

The Cost of Inaction: The failure to safeguard civic space has far-reaching consequences, not only for the Western Balkans and Türkiye but for the EU itself. A weak and fragmented civil society increases the risk of political instability, as public trust in institutions declines and dissatisfaction grows. In countries where ethnic divisions already strain governance structures, the exclusion of civil society from decision-making further deepens public disillusionment, increasing the potential for unrest. Where government control over civic engagement has tightened, opposition to EU integration is rising, as many view the accession process as failing to deliver tangible democratic progress.

The weakening of civic space also creates openings for external actors with anti-democratic agendas, including Russia and China, which provide alternative political and financial models that do not require democratic reforms. By failing to defend civic freedoms, the EU risks losing its influence in the region, allowing authoritarian forces to gain ground.

A Coherent EU Response Needed: The EU cannot afford to treat civic space as a peripheral concern in the enlargement process. A fragmented and reactive approach is no longer sufficient. Instead, civic space protections must be integrated into the core of EU conditionality, ensuring that restrictions on fundamental freedoms have direct consequences for accession progress.

The erosion of civil society is not just a problem for activists and journalists—it is a challenge to the very foundation of democratic governance and citizens' right in the Western Balkans and Türkiye. If the EU fails to act decisively, it risks overseeing an enlargement process where democratic standards exist in law but are absent in reality. Protecting civic space ensures that democracy delivers for citizens—through strong institutions, fair economies, and accountable governance. A truly democratic enlargement must be inclusive, participatory, and driven by the needs of society, not just political elites. Only by safeguarding civic space can the EU ensure that its enlargement project remains a credible force for democratic transformation and a better future for all.

CONCLUSIONS

If civic space in the Western Balkans and Türkiye continues to erode, freedoms will decline - restrictions on speech, assembly, and activism limit people's ability to hold leaders accountable, leading to unchecked power, higher corruption, and deepening distrust in institutions. Financial and political pressures will weaken CSOs defending rights and public interests. With fewer independent voices and media dominated with government-driven narratives, public participation in decision-making will shrink, and fear of retaliation will discourage citizens from engaging in activism, protests, and community initiatives, further reducing social cohesion. Without independent watchdogs, public funds are more easily misused, essential services decline, and policies increasingly serve political and private interests rather than the common good.

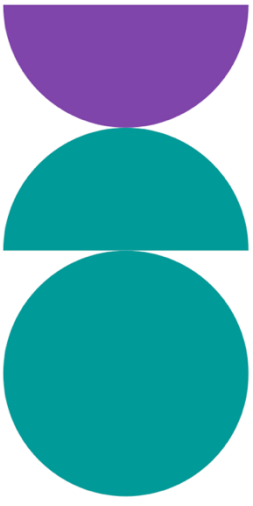
Without a decisive EU response, the region will drift further into illiberalism, where democratic principles exist in name but not in practice. Governments will maintain formal commitments to reform while systematically dismantling the very mechanisms that ensure accountability. This scenario will not only weaken democratic governance in the region but also threaten the EU's credibility as a champion of fundamental rights. If the EU allows candidate countries to advance toward accession while restricting civic freedoms, it sends a dangerous signal that democracy is optional, not essential, to the European project.

Success, by contrast, would mean an open civic space that empowers people to demand fair policies, challenge corruption, and hold leaders to their commitments. When civil society can operate freely, communities benefit from better services, stronger social protections, and policies that reflect their needs. Success would also mean an enlargement process in which civic space is treated as a pillar of democratic progress rather than an afterthought. A stronger and more structured EU approach would ensure that governments cannot sideline independent civil society without facing political and financial consequences. Open dialogue and public participation would become an integral part of policymaking, with civil society playing a recognized role in monitoring reforms. Media freedom would be safeguarded through legal protections that prevent political interference, and journalists would be able to report without fear of harassment or legal intimidation. A thriving civic space would mean a more informed and engaged public, capable of holding governments accountable and ensuring that EU-driven reforms translate into tangible improvements in governance and deliver real benefits for the people.

The key takeaway for policymakers is clear: **democratic backsliding in the Western Balkans and Türkiye is not just about institutions—it is about the people and organizations that ensure those institutions remain accountable.** Treating civic space as a secondary issue weakens the foundation of democracy and makes long-term reforms unlikely to succeed. This is why the EU must shift from a reactive to a proactive stance, integrating civic space protections into the core of its enlargement strategy. This approach is different because it recognizes that protecting civic space is not just about funding CSOs—it is about political leverage and enforcement. While financial support for civil society is crucial, it is insufficient if governments can continue to restrict fundamental freedoms without consequences. The EU must introduce binding civic space conditions with clear benchmarks.

Who should pay attention? **EU policymakers, Member States, and WBT governments all have a stake in this issue.** For EU institutions, failing to act now means jeopardizing the integrity of the enlargement process. For Member States, overlooking democratic backsliding in candidate countries risks creating future EU members that undermine the Union's core values from within. And for Western Balkan governments, maintaining a restrictive approach to civil society will only deepen public distrust, making long-term political stability harder to achieve.

The time for action is now. If the EU is serious about democratic transformation in the Western Balkans and Türkiye, it must recognize that an **open and independent civic space is not a negotiable condition of accession—it is a prerequisite.**



RECOMMENDATIONS

A structured and strategic response is needed to ensure that civil society in the Western Balkans can thrive as an essential force for democratic reform. This requires coordinated action from the EU institutions, national governments in the region, civil society itself, and international donors. The EU's Civil Society Strategy is a chance to embed civic space protections into enlargement. The following recommendations outline immediate and long-term steps to ensure that enlargement remains a democratic and participatory process.

IN THE NEXT 12 MONTHS...

The EC should introduce civic space benchmarks in Enlargement Reports

The European Commission should establish clear, measurable indicators on civic space as part of its annual enlargement assessments, covering legal protections for civil society, financial viability of CSOs, and civil society participation in decision-making. These benchmarks should be developed in consultation with independent CSOs and networks in the region, ensuring an accurate reflection of on-the-ground realities. The benchmarks for assessing candidate countries in the EU enlargement process should be directly linked to the announced European Civil Society Strategy, ensuring that WB governments are held to the same democratic standards as EU Member States.

The EC should institutionalize civil society's participation in accession reforms

To ensure that civil society plays a meaningful role in shaping and monitoring accession-related reforms, the European Commission should establish formalized consultation mechanisms that require regular, structured engagement with CSOs at both national and EU levels. This can be achieved by mandating that candidate countries create and maintain permanent civil society consultation platforms, linked to reform processes. These platforms should feed directly into EU accession reporting, ensuring that CSO perspectives are integrated into progress assessments.

The EU Delegations should establish a formal mechanism to report violations on civic space

EU Delegations should set up an independent civic space reporting mechanism that enables CSOs, independent journalists, and human rights defenders to directly report restrictions on civic freedoms. A formal mechanism within the EU Delegations should be integrated into EU

enlargement monitoring and trigger diplomatic responses such as demarches or formal dialogues with national governments. The mechanism should also facilitate emergency support, including legal aid and rapid response funding for at-risk civil society actors.

IN THE NEXT 2-3 YEARS....

The EC should strengthen direct funding for independent civil society

The European Commission should restructure the IPA funding mechanism and modalities to prioritize flexible, institutional support for CSOs, rather than short-term project funding. This means providing multi-year operational grants or framework partnerships that allow CSOs to sustain their mission-driven work and deliver essential services without relying on unstable donor cycles. Instead of outsourcing support through external-led technical assistance (e.g. consultancies or multilateral institutions), the EU should prioritize direct funding for locally owned and locally led civil society initiatives, ensuring long-term impact and sustainability.

IN THE NEXT 3-5 YEARS....

The EC and the EP should integrate civic space protections into a structured, gradual enlargement process

The European Parliament should pass a resolution ensuring that civic space protections are systematically embedded in the EU accession process without misused to stall negotiations. By 2027, the European Commission should establish a binding framework that reinforces democratic safeguards and accountability as countries advance toward membership. This should include clear monitoring frameworks, financial incentives, and structured responses to serious civic space violations, ensuring that integration progresses while reinforcing democratic resilience. These safeguards should be tailored to country-specific risks, distinguishing between systemic violations and isolated setbacks.

Civil society actors should be formally integrated into the monitoring frameworks, ensuring that democratic benchmarks reflect on-the-ground realities rather than being dictated solely by governments. This approach would align with existing EU rule-of-law mechanisms and post-accession monitoring, ensuring that enlargement remains a dynamic and inclusive process, not a rigid barrier.

Moving Forward: A Shared Responsibility

The future of EU enlargement—and the credibility of its democratic values—depends on how civic space is protected in the Western Balkans and Türkiye. This is not just a responsibility of civil society, but a collective effort requiring political will from the EU, national governments, and international donors. For the **European Union**, this means integrating civic space into enlargement conditionality and ensuring financial support translates into real protections for civil society. For **WBT governments**, it requires moving beyond performative reforms and genuinely engaging with and financially supporting independent civic actors. And for **international donors,** it means reshaping funding models to prioritize long-term sustainability over short-term projects.

Failure to act will not only weaken democracy in the region but also undermine the EU's role as a force for democratic transformation. The EU must recognize that indefinite delays in enlargement do not strengthen democracy—they weaken it, leaving civic actors more vulnerable to state repression and external influences. Instead of relying on outdated conditionality tools that delay progress, the EU should institutionalize a structured, gradual integration process that holds governments accountable while ensuring that citizens do not bear the cost of political stalemates. The time to build a structured, strategic, and enforceable framework for civic space is now.

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