Monitoring Matrix on Enabling Environment for Civil Society Development

Regional Report
Western Balkans and Türkiye
2025

Balkan Civil Society
Development Network

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Regional Report: Western Balkans and Türkiye 2025

Simona Mladenovska, Anja Bosilkova-Antovska
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Balkan Civil Society Development Network

Address: Mitropolit Teodosij Gologanov 59-1/15, 1000 Skopje, Republic of North Macedonia

Phone: +389 2 6144 211

Email: executiveoffice@balkancsd.net

Website: www.balkancsd.net

www.monitoringmatrix.net

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About the publisher: Anja Bosilkova-Antovska, Executive Director

Author: Simona Mladenovska

Editor: Anja Bosilkova-Antovska

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List of Abbreviations

AML	Anti-Money Laundering
BCSDN	Balkan Civil Society Development Network
CFT	Countering the Financing of Terrorism
CSO	Civil Society Organisation
EC	European Commission
EU	European Union
FATF	Financial Action Task Force
FBiH	Federation of Bosnia and Herzegovina
FOI	Freedom of Information
GDPR	General Data Protection Regulation
GONGO	Government-Organized Non-Governmental Organisation
IPA	Instrument for Pre-Accession Assistance
LGBTI	Lesbian, Gay, Bisexual, Transgender and Intersex
M&E	Monitoring and Evaluation
MM	Monitoring Matrix
NGO	Non-Governmental Organisation
NPO	Non-Profit Organisation
OSCE	Organisation for Security and Co-operation in Europe
RS	Republika Srpska
SLAPP	Strategic Lawsuit Against Public Participation
UNDP	United Nations Development Programme
USAID	United States Agency for International Development
VAT	Value Added Tax
WBT	Western Balkans and Türkiye

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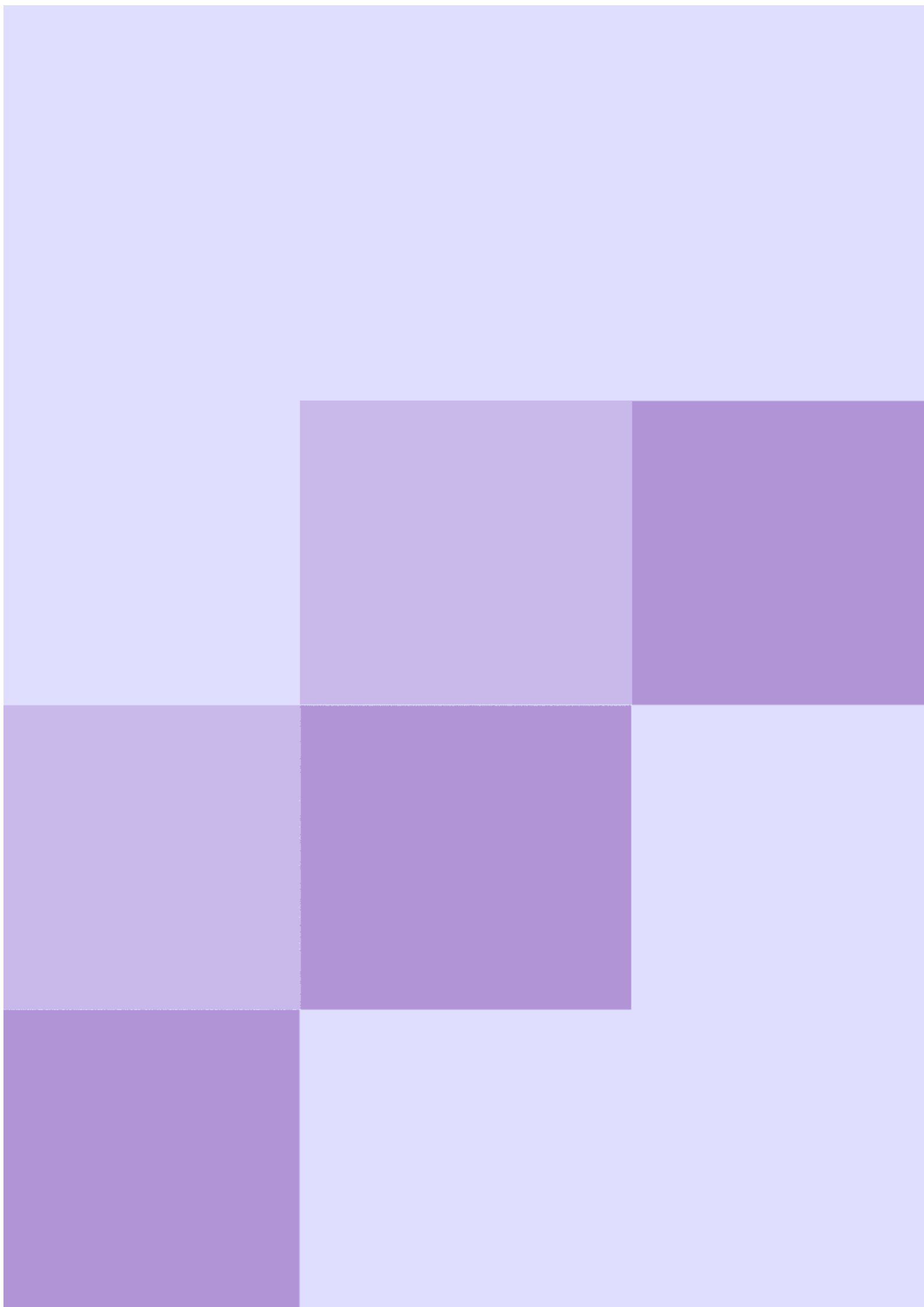


Executive summary

The 2025 Monitoring Matrix findings reveal a persistent and, in several countries, widening gap between the formal legal guarantees for civil society and the conditions in which civil society organisations (CSOs) operate. While basic freedoms, institutional mechanisms and legal provisions supporting civil society are largely in place across the Western Balkans and Türkiye, their implementation remains inconsistent, unpredictable and often subject to administrative or political discretion. The central challenge is therefore not simply the absence of enabling legislation, but the failure to translate existing rights and commitments into meaningful protections, accessible resources and effective participation.

Civic space remained highly uneven, with particularly serious deterioration in Serbia, Türkiye and Republika Srpska. Pressure on independent and critical civil society increasingly extended beyond direct legal restrictions to include hostile political rhetoric, smear campaigns, selective inspections, financial and banking obstacles, strategic lawsuits against public participation (SLAPPs), online harassment and surveillance concerns. Restrictions on **freedom of assembly and expression**, alongside institutional pressure and excessive policing, were particularly pronounced in Serbia and Türkiye. In Republika Srpska, the adoption and initial implementation of restrictive "foreign agents" legislation illustrated the speed with which legal measures can undermine civic freedoms, even when subsequently overturned by the judiciary. Across the region, narratives questioning the legitimacy of foreign-funded organisations gained further traction amid the disruption of US foreign assistance.

This report provides a timely, evidence-based assessment of civic freedoms and the enabling environment for civil society across the Western Balkans and Türkiye in 2025, a year marked by deepening democratic backsliding, increasing pressure on independent civil society and significant disruptions to its financial sustainability. While the nature and intensity of these developments varied across countries, the findings reveal a growing disconnect between formal commitments to fundamental freedoms and democratic participation and the realities faced by CSOs.

Drawing on over a hundred country-level data points, field research by national experts, verified incident reporting, and civil society consultations coordinated by the Balkan Civil Society Development Network, the analysis reflects both regional trends and country-specific developments. While the research prioritizes accuracy and triangulation of sources, some limitations persist, including incomplete data due to legal opacity and the underreporting of challenges faced by CSOs and activists working informally or in rural areas. This report maintains full editorial independence. Its aim is not only to inform but to offer credible, actionable insights for policymakers, donors, and civic actors committed to reversing civic space erosion in the region.

Financial sustainability emerged as a particularly acute vulnerability in 2025. Public funding remained fragmented, predominantly short-term and project-based, with limited institutional support, inconsistent procedures and insufficient transparency. Private philanthropy and domestic giving offered few viable alternatives, while disproportionate anti-money laundering and counter-terrorist financing (AML/CFT) requirements and restrictive banking practices created additional barriers to accessing resources, often without evidence of corresponding sectoral risk. The sudden disruption of international assistance in 2025 constituted a major financial shock in its own right, exposing the structural fragility of a sector heavily dependent on project-based funding and operating with limited organisational reserves. In parts of the region, this resulted in staffing reductions and the loss of specialised expertise, with consequences extending beyond individual organisations to the sector's longer-term capacity and resilience.

The **conditions supporting civil society's longer-term development** also remained weak. Employment in the sector continued to receive insufficient recognition in public policies and official statistics, while volunteering faced administrative obstacles and limited institutional support. Although CSOs were legally recognised as providers of essential social, educational, health and other services, public contracting and financing arrangements rarely offered the stability needed to sustain continuous service delivery. Short-term funding and compliance-oriented monitoring continued to prevail over predictable partnerships and assessments of service quality and impact.

Government–civil society cooperation continued to be characterised by a gap between formal participation and actual influence. Some positive developments were recorded, including the reactivation of cooperation councils in North Macedonia and Montenegro and the adoption of Bosnia and Herzegovina's first state-level strategy for creating an enabling environment for civil society. However, cooperation mechanisms elsewhere remained inactive, weak or largely symbolic. Public consultations generally provided opportunities to comment on already prepared proposals, but rarely ensured early involvement, adequate time for meaningful contributions, transparent feedback or demonstrable influence on final decisions. These shortcomings reinforce concerns that institutional recognition of civil society does not consistently translate into genuine partnership in policymaking.

Taken together, the findings point to a regional enabling environment in which **formal recognition of civil society is not matched by sufficient institutional accountability, financial security or meaningful political participation**. The deterioration of civic freedoms in several countries, combined with the 2025 funding shock and persistent implementation failures, threatens not only the sustainability of individual organisations but also civil society's collective capacity to act independently, hold institutions accountable and contribute to democratic reforms. Addressing these challenges requires moving beyond legislative and institutional commitments towards their consistent implementation, effective protection of fundamental freedoms, more predictable and diversified funding, and genuine recognition of civil society as an independent actor in democratic governance and EU integration.

Best of 2025

Albania	Albania showed what non-financial support can look like: following a public call, two NPOs were granted the use of confiscated properties to run a cultural and community space and centre providing reintegration services to vulnerable groups.
Bosnia and Herzegovina	The Constitutional Court of BiH annulled Republika Srpska's "foreign agents" law as incompatible with Article 11 of the European Convention on Human Rights, showing that judicial safeguards can still correct restrictive legislation.
Kosovo	Kosovo's Constitutional Court annulled the Law on the Independent Media Commission, which had raised concerns about media freedom and regulatory independence. Civic mobilisation on labour, gender equality, LGBTI rights and institutional accountability also proceeded largely without restriction.
Montenegro	A proposal to ban road blockades in Montenegro was withdrawn in July after strong opposition from civil society, domestic political actors and international organisations, a clear example that civic pushback works.
North Macedonia	The Council for Cooperation between the Government and Civil Society in North Macedonia resumed its work, while the Government adopted a new Strategy for cooperation with civil society for 2025–2028.
Serbia	Despite repression, citizens in Serbia sustained the largest demonstrations recorded in the region in two decades, with student-led, anti-corruption and environmental mobilisations showing the strength of civic resistance.
Türkiye	The Council of State in Türkiye annulled the risk-based audit rules for associations, finding that they violated the principles of legal certainty and foreseeability, although audits based on risk analysis remain possible.

Worst of 2025

Albania	Albania's electronic NPO registry, required by law since December 2023, was still not functional, and registration at the Tirana court took around 90 days on average, against a 15-day legal limit.
Bosnia and Herzegovina	BiH's Republika Srpska adopted a "foreign agents" law targeting foreign-funded organisations. Shortly after its adoption, tax inspections were reportedly sent to critical media and NGOs, showing how quickly restrictive legislation turns into practical pressure.
Kosovo	Kosovo went through 2025 without a strategy for cooperation with civil society, and the Council for cooperation did not meet once. Most organisations whose comments were rejected in consultations received no written explanation.
Montenegro	The July 2025 draft Law on NGOs in Montenegro, prepared partly to meet anti-money-laundering standards, would have allowed ministries to supervise NGOs in their fields, and went through a rushed public debate.
North Macedonia	The suspension of USAID funding led to widespread layoffs and non-renewed contracts in North Macedonia, while state support remained the lowest-scoring sub-area in the region. CSO employment fell by 6.7%.
Serbia	Civic space in Serbia deteriorated systemically, as police raided five organisations in a single day and more than 1,000 protest-related arrests were recorded since November 2024. Monitoring documented 189 violations of the right to peaceful assembly and 309 violations of freedom of expression, while the 15 March events and the alleged use of a sonic device against peaceful protesters remain unresolved.
Türkiye	In Türkiye, notification of assemblies worked as a de facto permission system: there were 126 days of bans on all demonstrations across 13 provinces, at least 8,477 people were detained, and for the first time in the history of Pride marches in Türkiye, participants in the İstanbul Pride March were arrested.

Key Country Recommendations for Action

Albania:

- Make the electronic NPO registry fully functional without further delay, with a published timeline and interim progress reporting.
- Adopt a successor strategy to the 2019–2023 Road Map for an enabling environment for civil society, and back achievement claims under the Roadmap for the Functioning of Democratic Institutions with published, transparent evidence.

Bosnia and Herzegovina:

- Ensure swift, funded and monitored implementation of the Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029 and its Action Plan, with meaningful CSO participation in its oversight.
- Establish a permanent legal safeguard against "foreign agent"-style legislation at all levels of government, and investigate and sanction politically motivated inspections and other pressure on CSOs and independent media.

Kosovo:

- Align AML/CFT policies with FATF Recommendation 8 and the sectoral risk assessment, remove the blanket treatment of NGOs as reporting entities, and ensure non-discriminatory access to banking services for CSOs.
- Fully implement the minimum standards for public consultation, including early engagement, timely and reasoned feedback on contributions, and routine publication of consultation reports.

Montenegro:

- Deliver the new Law on NGOs through an inclusive public debate that involves the wider public and results in a high-quality law.
- Fully implement the Strategy on cooperation between state authorities and NGOs, and start drafting the next strategy based on lessons learned.

North Macedonia:

- Transparently finalise the amendments to the Law on Associations and Foundations, incorporating the input collected through the ENER consultation and regional hearings.
- Move beyond partial solutions such as the guarantee fund towards a comprehensive, predictable and transparent state funding system, and adopt the amendments to the Law on Donations and Sponsorships to strengthen incentives for giving.

Serbia:

- Establish an effective external mechanism to control and sanction excessive use of force by the police, and conduct an independent investigation into the events of 15 March 2025.
- Establish a mechanism to protect human rights defenders and CSOs from targeting, attacks and the abuse of anti-money-laundering rules and other regulations.

Türkiye:

- Align the legal framework on assemblies with a genuine notification system, ending preemptive and blanket bans and the detention of peaceful protesters.
- Refrain from reintroducing the “agent of influence” draft law, and ensure that oversight of associations is proportionate, risk-based and in line with the Council of State ruling.

Introduction

The Balkan Civil Society Development Network (BCSDN) is pleased to present the eleventh edition of the Monitoring Matrix on Enabling Environment for Civil Society Development, covering developments in the Western Balkans and Türkiye in 2025.

The Regional Report summarizes the findings and recommendations from the country reports covering the six countries in the Western Balkans (Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro, and Serbia) and Türkiye. An interactive web platform offering access to monitoring data per country is available at https://monitoringmatrix.net.

The Monitoring Matrix, developed in 2013 by BCSDN with support of its members and partners, presents the main principles and standards that have been identified as crucial to exist for the environment to be considered enabling for the operations of CSOs. The Matrix is organized around three areas, each divided by sub-areas:

- Basic Legal Guarantees of Freedoms;
- Framework for CSOs' Financial Viability and Sustainability;
- Government – CSO Relationship.

The comprehensive methodology is based on international standards and best regulatory practices at the European Union level and in European countries. The Matrix aims to define the optimum conditions for civil society to function and develop effectively. At the same time, it aims to define a realistic framework that can be followed and implemented by public authorities. Having in mind that the main challenges lay in implementation, over 150 indicators are set to monitor both the existing legal framework and its practical application.

The Monitoring Matrix operates on an annual reporting cycle which ensures a systematic and comparable evaluation across the region and across years, helping stakeholders track progress or regression, identify gaps and emerging trends, and prioritize reforms. The research conducted aims to provide for shadow reporting on the enabling environment for CSDev and to influence EU Enlargement policy and funding support for sustainable and strategic development of the sector.

Background | Civil Society Overview

In 2025, civil society across the Western Balkans and Türkiye operated in an increasingly complex political and social environment, shaped by democratic backsliding, political polarisation, shifting international priorities and uncertainty over future external support. Although circumstances differed across countries, concerns over democratic accountability, institutional independence and the treatment of critical voices remained central to the region's development. Civil society continued to expose institutional failures, defend fundamental rights, mobilise citizens and demand greater transparency and accountability. At the same time, its role became increasingly contested, particularly where governments and ruling political actors portrayed independent scrutiny as political opposition rather than a legitimate part of democratic governance.

The relationship between civic mobilisation and political power was particularly visible in Serbia, where the student-led protest movement that emerged following the November 2024 collapse of the Novi Sad railway station canopy developed into sustained nationwide mobilisation throughout 2025. Students, citizens and civic initiatives organised protests, university occupations and blockades, demanding accountability, institutional responsibility and the rule of law. The mobilisation demonstrated citizens' capacity to organise collectively and challenge entrenched political practices, while exposing deep divisions between state institutions and those demanding democratic accountability. Serbia highlighted a wider regional tension: civic engagement and demands for accountability remained strong even as the political environment became less receptive to criticism and independent oversight.

Across the region, civil society continued to engage in public-interest issues, from anti-corruption and environmental protection to social justice, minority rights, gender equality and the protection of vulnerable groups. However, organisations and activists working on politically sensitive issues faced particular challenges in an increasingly polarised public discourse. Gender equality and LGBTQI+ rights became prominent targets of political and ideological contestation, with campaigns against feminist organisations, human rights defenders and minority rights advocates normalising hostile narratives. Digital platforms increasingly facilitated disinformation, political attacks and the targeting of individual activists. These developments illustrate how pressures on civic engagement intersect with wider debates over rights, identity and democratic values.

The international political environment also changed significantly in 2025. The abrupt suspension of US foreign assistance, including USAID programmes, affected both the resources available to civil society and political discourse surrounding its legitimacy. In several countries, political actors and aligned media used changes in US foreign assistance policy to reinforce narratives portraying internationally supported organisations as instruments of foreign influence. These narratives coincided with broader geopolitical

tensions and growing contestation over democratic values. Meanwhile, shifting donor priorities, including the increasing allocation of resources towards security, defence, migration and other geopolitical concerns, raised questions about the future of sustained support for democratic development and independent civil society.

The EU integration process remained central to democratic reform and civil society engagement in the Western Balkans, although progress and political commitment varied considerably. Albania advanced its accession negotiations by opening all six negotiating clusters by November 2025, while Montenegro provisionally closed six chapters during the year. These developments renewed attention to reforms concerning the rule of law, democratic institutions and fundamental rights. However, formal accession progress also raised questions about whether legislative alignment and institutional reforms were accompanied by substantive democratic change. Civil society continued to contribute independent analysis, public scrutiny and policy recommendations through accession-related dialogue, emphasising that progress towards EU membership must be assessed not only through formal benchmarks but also through the functioning of democratic institutions and protection of fundamental rights in practice.

Where political or institutional instability persisted, the relationship between EU integration and democratic reform remained particularly challenging. In Bosnia and Herzegovina, political tensions and institutional disputes complicated reforms, while in Kosovo, prolonged institutional uncertainty affected public institutions and the reform agenda. North Macedonia continued to face obstacles in advancing EU accession, alongside challenges related to institutional trust and reform implementation. Türkiye remained in a distinct position, with accession negotiations effectively stalled and longstanding concerns over democratic governance, fundamental freedoms and civil society independence continuing to shape its political environment.

Despite these challenges, civil society remained an important source of democratic resilience. Grassroots movements, independent organisations, journalists, informal initiatives and human rights defenders continued to mobilise communities, document abuses, challenge institutional decisions and advocate for reforms. Their engagement demonstrated that democratic participation extends beyond formal consultation mechanisms, encompassing citizen-led initiatives, solidarity networks and collective action. Yet the experiences of 2025 showed that this resilience cannot be taken for granted, particularly amid polarised public debate, challenges to civic actors' legitimacy and uncertainty over resources needed to sustain their work.

Against this background, assessing the enabling environment for civil society requires looking beyond formal rights and institutional arrangements to understand the conditions enabling civic actors to fulfil their democratic role. The following Monitoring Matrix findings examine how these broader developments were reflected in the legal frameworks, institutional practices and practical conditions affecting civil society across the Western Balkans and Türkiye in 2025.

Civil Society Overview

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye (2024 data)
Number of registered organisations	13,300	27,432 (24,432 active)	12,907 local NGOs 491 international NGOs	approx. 7,500	13,158	38,919 associations, 1,173 endowments and foundations	101,388 associations, 6,094 foundations
Main civil society law(s)	Civil Code of Albania. Law No. 8788/2001 "For non-profit organisation". Law No. 8989/2001 and Law No. 80/2021 "For the registration of non-profit organisation"	Laws on Associations and Foundations on state, entity and Brčko District (BD) levels;	Law No. 06/L-043 on Freedom of Association in Non-Governmental Organisations (2019) Law No. 08/L-244 on Amending and Supplementing the Law No. 06/L-043	Law on Non-Governmental Organisations	Laws on Associations and Foundations	Law on Associations, Law on Endowments and Foundations	Turkish Civil Code Law on Associations, Law on Foundations, Law on Collection of Aid
Relevant changes in legal frameworks	1. Law No. 80/2021 "For the registration of non-profit organisations" amended 2. Instruction No. 6 of 24.02.2025 amending Instruction No. 6 of 30.01.2015 "On Value Added Tax in the Republic of Albania"	1. New state-level Law on Personal Data Protection 2. FBiH Criminal Code amendments 3. Peaceful assembly legislation harmonised in West Herzegovina, Central Bosnia, Posavina 4. Brčko District FOI Law 5. RS Strategy for the Improvement and Develop-ment of Volunteering	Amended: Administrative Instruc-tion (GRK) No. 02/2025 Amending and Supplementing the Administrative Instruction (GRK) No. 12/2022 on the Registration and Operation of Non-Governmental Organisations	Draft Law on NGOs put up for public debate	1. Law on Associations and Foundations 2. Law on Civil liability for insult and defamation	No relevant changes in the legal framework were adopted in 2025.	Annulment of certain articles of Law on Associations and Law on Collection of Aid by the Constitutional Court.
State funding*	Agency for the Support of Civil Society: 107 million ALL (approx. 1.12 million EUR)	No consolidated data available for 2025. Partial figures: RS Ministry of Administration and Local Self-Government 330,000 BAM; FBiH Ministry of Labour and Social Policy 1,000,000 BAM	Total reported: €16.54 million (KCSF adjusted estimate: €16.06 million) Direct to CSOs (excl. sport): €13.88 million Central gov: €9.16 million Local gov: €6.90 million	Ministries in the Government: €1,901,762.79 budgeted	845,991,595 MKD (approx. €13.7 million), 8.8% of total CSO income (central and local level)	11,689,889,000 RSD (approx. €99.9 million) under budget line 481, which also includes churches and sports associations	No aggregated data on state funding
Human resources (employees and volunteers)	No data on employees No data on volunteers	6,456 employees in FBiH (FIA) Approx. 5,000 in RS (estimate) No data for Brčko District	5,585 employees paid contributions continuously for 12 months, 2,386 CSOs declared employees, 1,420 CSOs paid contributions for their employees	1,856 employees	1,681 employees No data on volunteers	7,867 persons employed in associations and 1,090 in foundations (SBRA) No data on volunteers	22,324 employees and 411,945 volunteers in foundations. No data for associations.
CSO-Government Cooperation (relevant body/ consultation mechanism)	National Council for Civil Society, National Council for European Integration, Partnership Platform for European Integration	Advisory Body of Council of Ministers BiH for Cooperation with Civil Society, Sector for Legal Aid and Civil Society Develop-ment, Ministry of Justice	Council for Government – Civil Society Cooperation, Office of Good Governance Local Government, Consultative Forum of the Ministry of Local Government Administration, National Council for EU Integration	Council for Cooperation of state administration and NGOs	Council for Cooperation with Civil Society and Government	Ministry for Human and Minority Rights and Social Dialogue, Council for Creating an Enabling Environment CSDev**, Contact points for CSO cooperation, National Convention on the EU	Directorate General for Relations with Civil Society

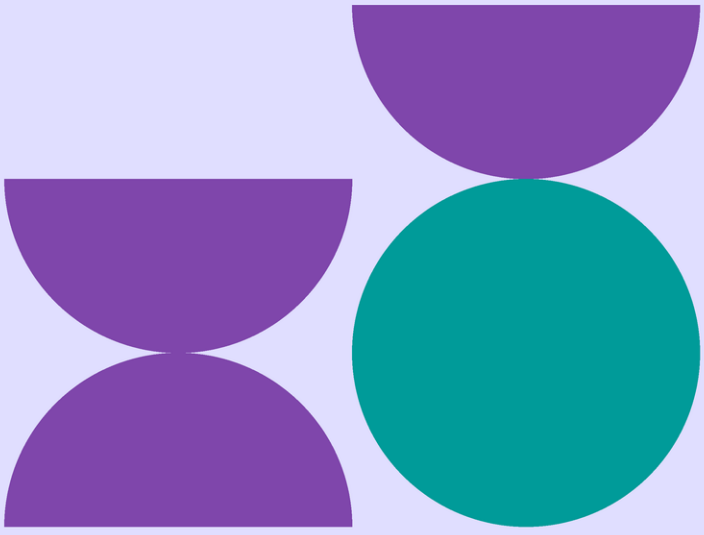
*State funding figures are not directly comparable: they reflect the data available in each country, ranging from a single agency (Albania) and budgeted amounts (Montenegro) to whole budget lines that also cover entities other than CSOs (Serbia).

** Due to violations of citizens' rights and continuous pressure by the authorities on CSOs, all CSO members of the Council froze their membership beginning of 2025, and the Council did not function during the year.

Findings

Area 1: Basic Legal Guarantees of Freedoms

1.1 Freedom of Association



1.1.1. Establishment of and Participation in CSOs

Legal frameworks across the region generally guarantee freedom to establish, join and participate in CSOs, although important nuances remain regarding administrative requirements. An enabling legal framework burdened by administrative procedures—whose existence is often explained by the need for alignment and harmonisation with other laws and bylaws—would be the broadest definition of the current state of affairs in this area. In practice, these arrangements produce recurring patterns of prolonged registration procedures and requirements to submit extensive documentation.

In most countries, 2025 was a year in which **legislative amendments** were either adopted or initiated, although the direction and pace of reform varied considerably. Albania demonstrated a pattern of delayed reform: two years after the relevant Constitutional Court decisions,[1] the Law on the Registration of Non-Profit Organisations was amended in December 2025 to reflect their provisions. In Türkiye**,** previously proposed amendments to the legal framework remained shelved in 2025, while the framework governing associations and foundations otherwise remained largely unchanged.

Montenegro's Law on NGOs entered the amendment and consultation phase, during which several problematic provisions became apparent, particularly those intended to fulfil AML/CFT standards. Provisions related to FATF Recommendation 8 risked introducing overly restrictive requirements rather than proportionate measures. Although adoption by the end of 2025 was the stated objective—and the justification for a rushed public debate—the redrafting process continued into 2026. In North Macedonia, the long-stalled reform of the Law on Associations and Foundations resumed in 2025 through a multi-stakeholder working group and public consultation,[2] although the final draft remained pending at the end of the reporting period.

The amendments introduced in Kosovo were likewise not assessed as entirely positive. The 2025 Administrative Instruction[3] aligned the secondary registration framework with the 2024 amendments to the NGO Law,[4] including the extension of the period within which the Department for NGOs must decide on a registration application from 30 to 45 days. This gave the Department an additional 15 days to process requests, reversing part of the progress achieved through the 2019 Law, which had reduced the deadline from 60 to 30 days.

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[1] Constitutional Court of Albania, Decision of 20 November 2023, Official Gazette 5/2024. https://qbz.gov.al/eli/vendim/2023/11/20/62/54732040-bf13-412e-8d47-09b1736264d6

[2] MCIC, MCIC Contributed to the Creation of the New Law on Associations and Foundations, 30 January 2026. https://mcms.mk/en/news-and-publicity/news/2794-mcms-pridonese-vo-kreiranjeto-na-noviot-zakon-za-zdruzhenija-i-fondacii.html

[3] Administrative Instruction (GRK) No. 12/2022 on the Registration, Operation and Deregistration of NGOs, as amended by Administrative Instruction (GRK) No. 02/2025. https://gzk.rks-gov.net/ActDetail.aspx?ActID=66914

[4] Law No. 08/L-244 on Amending and Supplementing Law No. 06/L-043 on Freedom of Association in Non-Governmental Organisations, Official Gazette No. 1/2024. https://gzk.rks-gov.net/ActDetail.aspx?ActID=85110

In Bosnia and Herzegovina, the principal development did not concern the registration procedure itself but represented a direct legislative challenge to the broader framework of associational freedom. While the laws governing associations and foundations remained unchanged, Republika Srpska adopted the Law on the Special Registry and Transparency of the Work of Non-Profit Organisations,[5] commonly referred to as the "foreign agents" law, in February 2025. On 30 May 2025, the Constitutional Court of Bosnia and Herzegovina[6] invalidated the Law as unconstitutional, finding it incompatible with Article 11 of the European Convention on Human Rights. The Court's decision reaffirmed the constitutional protection of freedom of association, but the episode demonstrated how directly and rapidly this freedom can be placed at risk before judicial correction.

In Türkiye, the legal framework formally guarantees freedom of association, but administrative and legal restrictions continue to affect the establishment and participation of CSOs. While associations can be established without prior permission, vague legal provisions allow for administrative discretion, particularly regarding organisations' purposes, while burdensome requirements concerning office space and the establishment of federations and confederations create additional practical barriers. Associations also cannot currently be registered through an online registration procedure, requiring applicants to complete the excessively formalistic establishment process through the administrative authorities. Since October 2021, associations have also been required to report changes in their membership to the authorities within 45 days. This requirement has been observed as a factor contributing to reluctance to join associations and declining membership rates, a trend that continued in 2025. The establishment of foundations remains more demanding, requiring a minimum asset threshold of TRY 2 million as of 2025 and court approval, while foreign CSOs face additional hurdles in establishing branches or representative offices, including prior permission from the Ministry of Interior.

Freedom to form and participate in domestic and international **networks and coalitions** also remained broadly unrestricted across the region, with no significant new barriers reported in 2025. Informal organizing also remained generally operational, with no country introducing mandatory registration of informal groups. Some restrictions nevertheless affected specific forms of informal civic participation. In North Macedonia, amendments to the Electoral Code introduced new requirements restricting the participation of citizens' initiatives in elections. In practice, however, significant pressure was recorded in Serbia, where informal groups working on issues including elections, corruption and local civic concerns[7] faced attacks,[8] threats, arrests and other forms of pressure, while cooperation with public authorities remained extremely limited.

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[5] National Assembly of Republika Srpska, Law on the Special Registry and Transparency of the Work of Non-Profit Organisations, Official Gazette of Republika Srpska 19/25.
[6] Constitutional Court of Bosnia and Herzegovina, Decision No. U-6/25, 30 May 2025. https://www.ustavnisud.ba/en/158th-plenary-session-the-course-of-the-session-so-far
[7] Danas, Huligani upali u šator inicijative Most ostaje, 4 March 2025. https://www.danas.rs/vesti/drustvo/huligani-upali-u-sator-inicijative-most-ostaje/
[8] N1, Zborovi građana tvrde da su njihovi članovi noćas napadnuti ispred Skupštine Srbije, 26 November 2025. https://n1info.rs/vesti/zborovi-gradjana-tvrde-da-su-njihovi-clanovi-nocas-napadnuti-ispred-skupstine-srbije-u-beogradu/

Legal amendments have not necessarily removed the **practical burdens associated with registration**. Albania has recorded excessive delays with the average registration time reaching around 90 days against a 15-day statutory limit, while delays and inconsistent administrative practice were also reported in Bosnia and Herzegovina and Montenegro. In Bosnia and Herzegovina, although 83% of recently registered surveyed CSOs completed registration within the 30-day legal deadline, one organisation waited more than ten months for a state-level registration decision and lost significant project opportunities in the meantime. In Kosovo, the statutory decision-making period was extended to 45 days, creating a potential risk of slower registration, although no comparable pattern of delays was documented in practice. The regional challenge is therefore no longer simply whether organisations are legally free to register, but whether administrative systems allow them to exercise that freedom within reasonable and predictable timeframes.

1.1.2. State Interference

National legal frameworks generally guarantee the autonomy and independent functioning of CSOs. Organisations are formally free to establish their internal governing structures and operate without state involvement in appointment or decision-making procedures. Several developments in 2025 nevertheless demonstrated how legislative initiatives, regulatory oversight and administrative practice can place these guarantees under pressure.

In Republika Srpska, the guarantee of autonomy was directly challenged through the adoption of the Law on the Special Registry and Transparency of the Work of Non-Profit Organisations, which primarily targeted organisations receiving foreign funding. In Montenegro, the draft Law on NGOs opened for public debate in July 2025 introduced a new form of oversight that would allow each ministry to supervise NGOs operating within its respective field.

A recurring regional concern remained the **disproportionate treatment of CSOs under AML/CFT and banking compliance frameworks**. In several countries, risk assessments or available evidence indicated low levels of terrorist-financing risk, while regulatory requirements and banking practices continued to impose additional scrutiny and administrative burdens. In Albania, the Financial Intelligence Agency reported no suspicious activity reports linking NPOs to suspected terrorist financing, no restrictions on access to foreign funding through banking or non-banking institutions, and no temporary freezing orders affecting NPO accounts or transactions during the year. Nevertheless, a draft AML/CFT amendment introduced the category of NPOs "considered high-risk"[9] without clearly defining the criteria for such classification, raising concerns about disproportionate and discretionary application. In Kosovo, the first Sectoral Risk Assessment on terrorist financing for the NGO sector was completed and validated at

[9] Ministry of Finance of Albania, Draft Law amending Law No. 9917/2008 on the Prevention of Money Laundering and Financing of Terrorism, public consultation. https://www.konsultimipublik.gov.al/Konsultime/Detaje/888

working-group level, finding the overall level of terrorist-financing risk in the sector to be relatively low, although the assessment has not yet been formally approved. In Bosnia and Herzegovina, CSOs remain excluded as obliged entities under the AML/CFT law, while a formal risk assessment disaggregating CSOs by risk level is planned for 2026.

Serbia faces a similar contradiction. The banking sector classifies 20% of non-profit organisations as high-risk, although joint inspections conducted in 2013, 2018, 2021 and 2024 covered 64 associations and 10 foundations and endowments and identified only several minor financial irregularities and violations.[10] These most commonly concerned unauthorised cash withdrawals, expenditures made without appropriate documentation and activities that were not aligned with the organisations' statutory objectives.

The clearest **discrepancy between formal guarantees and institutional practice** was recorded in Serbia. Surveyed organisations reported unannounced financial control of projects, targeting through tabloids and television channels with national frequencies, an investigation by the Criminal Police Directorate at an organisation's premises, suspension of funding by the responsible ministry, prolonged freezing of accounts,[11] and restriction in access to banking services. Combined with public targeting of critical organisations, these practices demonstrate how administrative, financial and regulatory mechanisms can be used to restrict CSO operations.

The most severe deterioration, however, was recorded in the Republika Srpska entity of Bosnia and Herzegovina, where 2025 was defined by the practical fallout of the **"foreign agents" law**. Immediately after its adoption on 27 February 2025, tax inspections were reportedly dispatched to independent media outlets and NGOs critical of the Republika Srpska authorities, while CSOs described some inspections as formally regular but politically motivated in substance. The subsequent annulment of the Law removed its formal legal basis, but it did not erase the pressure already exercised through its adoption and immediate implementation.

In Türkiye, **extensive administrative oversight and excessive regulatory requirements**, arising from multiple sources of law and administrative practices, continue to create pressure on their independent functioning. The draft legislation known as the 'agent of influence' law, a Turkish equivalent to the foreign agent laws, remained shelved in 2025, but may still be reintroduced to the parliament in the future.[12] In May 2025, the Council of State annulled the risk-based audit rules for associations,[13] introduced under Law No. 7262

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[10] Working Group for the National Risk Assessment, Risk Assessment of the Abuse of Non-Profit Organisations for Terrorist Financing (2024). https://www.apml.gov.rs/uploads/useruploads/Documents/04%20Procena%20rizika%20od%20zloupotrebe%20neprofitnih%20organizacija%202024.pdf

[11] Radar, Računi kritičara režima na meti mašinerije vlasti, 6 February 2025. https://radar.nova.rs/drustvo/uprava-za-sprecavanje-pranja-novca-kriticari/

[12] ICNL, Civic Freedom Monitor: Türkiye. https://www.icnl.org/resources/civic-freedom-monitor/turkiye

[13] TÜSEV, Council of State Annuls Risk-Based Audit Rules for Associations (Council of State, 10th Chamber, Case No. 2021/6971, Decision No. 2025/2774, 28 May 2025). https://tusev.org.tr/?p=2437

as part of Türkiye's AML/CFT framework , finding that the relevant provisions lacked a sufficient legal basis and violated the principles of legal certainty and foreseeability.[14] The decision nevertheless maintained the possibility of conducting audits based on risk analysis. CSOs working on human rights and advocacy and those receiving foreign funding, have continued to report repetitive and invasive audits and heightened scrutiny of their activities and funding sources. Throughout 2025, CSOs also continued to face investigations, public targeting and judicial proceedings related to their activities, including cases involving proceedings for the dissolution of organisations.

Other elements of the formal framework remained broadly stable: **sanctions and dissolution procedures** generally continued to be regulated by law (with Albania's Law No. 80/2021 lacking an explicit appeal provision for dissolution decisions, although deregistration following court-ordered dissolution requires a final court decision), while no regional pattern of arbitrary termination of organisations was identified. **Financial reporting requirements**, however, were not consistently adapted to the size and non-profit nature of CSOs. A new burden emerged in the Federation of Bosnia and Herzegovina, where tax authorities markedly stepped up taxation of project participant costs such as meals, travel and accommodation, calculated according to each participant's municipality of residence. Several CSOs in Tuzla were fined for non-payment, and the practice adds considerable administrative and financial pressure on organisations delivering trainings, consultations and field activities.

Overall, direct state interference in the internal governance of CSOs remained limited in most countries, but this did not mean that organisations were able to operate without institutional pressure. Threats by officials, selective inspections, excessive financial controls and restrictions on banking services were reported in several countries, with the strongest patterns recorded in Serbia and Republika Srpska. Elsewhere, the more persistent constraints arose from compliance and banking requirements rather than direct government interference.

1.1.3. Seeking and Securing Financial Resources

CSOs throughout the region remained formally free to seek and secure financial resources from domestic and foreign sources. The legal framework is largely enabling in this respect, but practical barriers continue to constrain the use of foreign funding, private giving, economic activities and banking services. Legal frameworks remained largely unchanged in 2025. Reform discussions in some countries, such as the laws on donations and sponsorships[15] in both Albania and North Macedonia, nevertheless highlighted persistent weaknesses in domestic fundraising and tax incentives, issues examined further under Area 2.

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[14] STGM, Critical Council of State ruling for CSOs. https://www.stgm.org.tr/en/critical-council-state-ruling-csos-risk-classification-associations-annulled

[15] Draft Law On Donations and Sponsorships in the Republic of Albania, February 2026. https://www.konsultimipublik.gov.al/Konsultime/Detaje/920

Although receiving foreign financial support is legal in every country covered by the report, the **administrative, bureaucratic and banking conditions** attached to it vary considerably. Yet when public funding ranges from negligible to non-existent, access to foreign donors is not simply one financing option among many: for a significant part of civil society, it is a condition for survival. The same is true of the opportunities and incentives available to CSOs seeking to diversify their income beyond conventional grant schemes. Domestic private fundraising was legally possible throughout the region, but remained underdeveloped and uneven in practice, particularly for online and alternative fundraising methods, where fees, unclear regulation and administrative requirements continued to limit wider use.

In Bosnia and Herzegovina, no relevant legal changes were recorded during the year, but the ability of associations and foundations to seek and secure financial resources continues to depend heavily on the level of government at which an organisation is registered. This reflects the broader fragmentation of the country's legal and institutional framework. For CSOs in North Macedonia, foreign funding continues to be hindered by protracted and centralised administrative protocols, as organisations must register donor-funded projects to qualify for statutory VAT exemptions - a process characterised by extensive delays, manual submission requirements available only in the capital and a pervasive lack of institutional clarity.

In Türkiye, administrative requirements related to receiving foreign funding continued to place excessive burdens on CSOs. The notification requirements applicable to foreign funding remained complex and insufficiently clear, while CSOs receiving foreign funding continued to face heightened administrative scrutiny and intrusive oversight in practice. Access to public funding remained limited and uneven, with public support concentrated among a relatively small number of organisations and subject to limited transparency and foreseeability. The Law on Collection of Aid remained a particular constraint on fundraising, as certain donation and fundraising activities remained subject to burdensome permission requirements and administrative procedures. Serbia represented the clearest deterioration in practice. Although foreign funding remained legally permitted, CSOs reported banking and administrative obstacles while senior officials repeatedly portrayed foreign-funded organisations as acting against national interests and called for restrictions on foreign financing.[16] The formal right to seek resources therefore coexists with conditions that can make their acquisition or practical use considerably more difficult.

CSOs were also generally permitted to **engage in economic activities**, although their practical use remained limited and the level of regulatory burden varied. Survey findings in Kosovo, Bosnia and Herzegovina, and Montenegro showed that only a small share of organisations generated income through economic activity, while administrative, reporting and licensing requirements created difficulties for some organisations. In Albania, access to finance remained a key challenge for CSOs engaging in economic

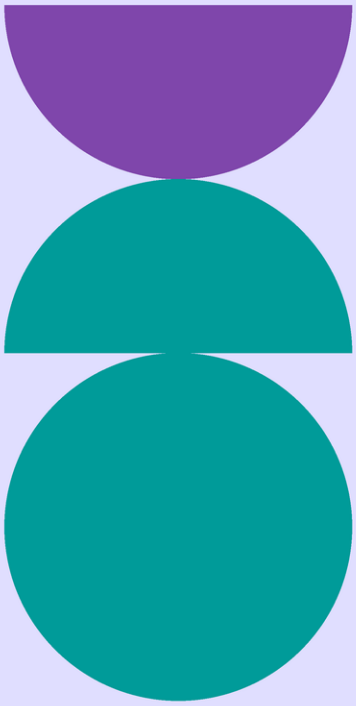
[16] N1, Čas su milijarde, čas stotine miliona evra, 22 February 2025. https://n1info.rs/vesti/cas-su-milijarde-cas-stotine-miliona-evra-koliko-kosta-navodno-rusenje-vucica-zavisi-od-toga-kakav-mu-je-dan/

activities, alongside limited fiscal incentives and legal and administrative burdens that constrained their sustainability and growth. In Türkiye, CSOs were legally permitted to engage in income generating economic activities, but these remained a limited source of funding in practice, with administrative and economic constraints restricting their wider use. In Serbia, some organisations engaged in economic activity reported practical obstacles, including lack of suitable premises and pressure on external collaborators not to cooperate with particular associations.

Access to banking and financial services emerged as a more consistent regional constraint. In several countries, CSOs continued to face additional documentation requirements, higher costs, delayed transactions or restricted services, often linked to banks treating non-profit organisations as higher-risk clients. These practices did not generally prevent organisations from operating, but they increased the cost and administrative burden of receiving and managing funds.

The formal freedom to seek and receive funding has consequently not produced genuine financial diversification nor it always translates into easy and non-discriminatory access in practice. CSOs continue to depend heavily on foreign grants, while administrative barriers, fragmented systems, weak incentives for domestic giving and limited opportunities for economic activity constrain meaningful diversification of its funding base. The principal regional challenge is therefore not the legal right to raise funds, which remains broadly protected, but the practical conditions under which different sources of financing can be accessed and used.

1.2 Related Freedoms



1.2.1. Freedom of Peaceful Assembly

The right to peaceful assembly is constitutionally guaranteed throughout the region, while specific laws and secondary legislation determine the conditions under which it may be exercised. These provisions regulate where assemblies may take place, whether and within which timeframe they must be notified, the grounds on which they may be restricted or prohibited, the responsibilities of organisers, and the legal consequences when an assembly escalates and can no longer be considered peaceful.

Legal frameworks are broadly aligned with international standards, generally requiring notification rather than authorisation, although recognition and protection of spontaneous, simultaneous and counter-assemblies remain uneven. North Macedonia imposes excessive liability on organisers through high fines and maintains discriminatory provisions requiring foreign nationals to obtain explicit state approval before exercising their right to assemble. Montenegro restricts assemblies near certain government buildings, [17] while Albania and Serbia lack explicit provisions regulating counter-assemblies, creating ambiguities when simultaneous gatherings bring groups with opposing positions into direct contact. Digitally mediated assemblies remain unrecognised by specific legislation throughout the region, leaving this form of civic mobilisation without tailored legal safeguards. In Türkiye, although the law formally provides for a notification based system, local authorities have broad discretion to prohibit assemblies pre-emptively, for renewable periods and on vague and arbitrary grounds, which in practice turned the notification requirement into a de facto authorization regime.

Bosnia and Herzegovina continues to meet international standards only partially because freedom of assembly is regulated through a patchwork of laws at cantonal level, in Republika Srpska and in Brčko District, without a state-level law. Incremental progress was recorded in 2025, as three cantons adopted legislation aimed at closer alignment with European standards, particularly regarding the grounds for restricting assemblies and the responsibilities of organisers. Legal guarantees nevertheless remain uneven, and the principal urban centres—including Sarajevo, Banja Luka, Tuzla and Mostar—remain within jurisdictions whose legislation is not fully aligned with European standards. Available remedies against politically motivated prohibitions also remain limited in parts of the Federation. Both the UN Special Rapporteur[18] and the European Commission[19] concluded in 2025 that freedom of assembly is not sufficiently or equally guaranteed across the country's jurisdictions, and in February 2025 the Sarajevo Canton Ministry of Interior banned a peaceful protest by entrepreneurs in front of the FBiH Parliament, citing a "real danger" to people and property. An important positive precedent came from Prijedor, where the Basic Court acquitted a participant in a spontaneous protest against an illegal

[17] Law on Public Assemblies and Public Performances of Montenegro, Official Gazette 52/16. https://www.katalogpropisa.me/propisi-crne-gore/zakon-o-javnim-okupljanjima-i-javnim-priredbama-2/
[18] UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, Report on the visit to Bosnia and Herzegovina, A/HRC/59/44/Add.1. https://bosniaherzegovina.un.org/en/316760-report-special-rapporteur-rights-freedom-peaceful-assembly-and-association-his-visit-bosnia
[19] European Commission, Bosnia and Herzegovina 2025 Report, SWD(2025) 751 final. https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2025_en

mine, recognising spontaneous peaceful protest as protected under Article 11 of the European Convention on Human Rights even though domestic law does not explicitly regulate it.

The formal framework came under renewed pressure in 2025 through legislative initiatives directly responding to protest tactics in Montenegro and Serbia. In Montenegro, members of the parliamentary majority proposed amendments to the Law on Public Assemblies that would have prohibited road blockades. The proposal targeted methods used during student-led mobilisations and protests organised by the families of victims of the Cetinje mass shooting, with authorities portraying the blockades as harmful to tourism and the economy. Introduced through irregular parliamentary procedure and without government endorsement, the amendments prompted strong opposition from civil society,[20] domestic political actors and international organisations,[21] which warned that they violated the principles of necessity and proportionality under international human rights standards. The proposal was withdrawn in late July,[22] but the attempt established a troubling precedent for using legislation to constrain specific forms of protest.

In Serbia, the Ministry of Justice proposed amendments to the Criminal Code that would allow blockades to be punished with imprisonment of up to one year.[23] Presented as a response to the "needs of practice," the proposal risked criminalising peaceful street blockades even where they posed no actual threat to public safety.[24] Its political context was unmistakable: blockades had become one of the principal methods used during the student-led protests. Rather than strengthening the protection of participants, the proposed amendments risked further exposing them, including in situations where individuals drove vehicles into peaceful gatherings.

Implementation was broadly consistent with legal guarantees in Albania, Kosovo and North Macedonia, although differences emerged in how authorities and political actors responded to civic mobilisation. Albania showed little **discrepancy between law and practice**: 22 CSO-organised assemblies were notified in 2025, and none was refused, no

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[20] Human Rights Action, Women's Rights Centre and Institute Alternative, joint statement, 2 July 2025. https://www.hraction.org/2025/07/02/non-governmental-organisations-warn-proposed-amendments-to-the-law-on-public-gatherings-represent-a-serious-violation-of-human-rights-and-a-circumvention-of-democratic-procedures/?lang=en

[21] Council of Europe Commissioner for Human Rights, Montenegro: Parliament should not adopt legislative amendments that excessively restrict freedom of peaceful assembly, 24 July 2025. https://www.coe.int/et/web/commissioner/-/montenegro-parliament-should-refrain-from-adopting-legislative-amendments-that-excessively-restrict-freedom-of-assembly

[22] MINA, Milatovic: Withdrawal of Draft Law on Public Assemblies is encouraging step. https://new.mina.news/en/article/milatovic-withdrawal-of-draft-law-on-public-assemblies-is-encouraging-step

[23] Position Paper of the Serbian Civil Society on the proposed amendments to criminal legislation in Serbia, October 2025. https://sharefoundation.info/wp-content/uploads/2025/10/Position-Paper-of-the-Serbian-Civil-Society-on-the-proposed-amendments-to-criminal-legislation-in-Serbia.pdf

[24] N1, Civic Initiatives warns of dangerous proposal to amend criminal code, 16 September 2025. https://n1info.rs/english/news/civic-initiatives-warns-of-dangerous-proposal-to-amend-criminal-code-every-road-blockade-to-be-a-criminal-offense

violence or related Ombudsperson complaints were reported. Kosovo saw sustained civic mobilisation across labour, gender equality, LGBTI rights and institutional accountability, with the large majority of gatherings proceeding without restriction, although isolated prohibitions and police interventions were recorded. In North Macedonia, protests concerning air pollution, the Kochani nightclub fire and the subsequent trial were not formally banned or obstructed by the authorities. Nevertheless, delegitimising rhetoric repeatedly portrayed the demonstrations as politically orchestrated,[25] challenging the legitimacy and independence of those participating in civic mobilisation.

This distance between formal respect and active delegitimisation resulted in a complete breakdown of relations between authorities and civil society in Serbia. In a year marked by the **largest demonstrations recorded in the region in the past two decades**, police used excessive force against peaceful demonstrators, detained environmental and anti-corruption protesters and deployed officers in plain clothes without visible identification. Tear gas was used against protesters, while counter-gatherings supporting the governing Serbian Progressive Party received police protection even when participants reportedly threw liquids and bricks at peaceful demonstrators. More than 1,000 arrests connected to protests were recorded from November 2024 onwards, accompanied by reports of intimidation, verbal abuse and physical violence by police and pro-government groups.[26]

The events of 15 March 2025 became emblematic of this deterioration. During one of the largest gatherings in Serbia's recent history, an unexplained disturbance caused panic in the crowd, followed by allegations that a sonic crowd-control device had been deployed against peaceful demonstrators. Serbian authorities denied this, while CSOs have documented over 3000 protesters areported physical symptoms and demanded an independent investigation.[27] The European Court of Human Rights subsequently issued an interim measure indicating that Serbia should prevent any use of sonic devices for crowd control, but the circumstances of the incident remain unresolved, and no accountability has been established.[28] The incident was part of a wider pattern: monitoring documented 189 violations of the right to peaceful assembly in 2025,[29] including excessive force, failures to protect demonstrators and efforts to criminalise blockades, resulting in an assessment of a fully disabling environment.

Serbia was not the only country in which **police conduct** raised concern. In Bosnia and Herzegovina, 10% of surveyed CSOs that organised assemblies reported excessive use of

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[25] 360 Degrees, Stop for Vardarishte vs. Acting Mayor of Aerodrom, 23 September 2025. https://360stepeni.mk/stop-za-vardarishte-kontra-v-d-gradonachalnikot-na-aerodrom-protestite-se-iskluchivo-graganski-i-ne-se-povrzani-so-politichka-partija/

[26] Council of Europe Commissioner for Human Rights, Serbia: the authorities should refrain from excessive use of force and arbitrary arrests, 4 July 2025. https://www.coe.int/en/web/commissioner/-/serbia-the-authorities-should-refrain-from-excessive-use-of-force-and-arbitrary-arrests

[27] Civic Initiatives, Saopštenje organizacija civilnog društva: Više od 3.000 svedočenja građana i građanki Srbije, 17 March 2025. https://www.gradjanske.org/saopstenje-organizacija-civilnog-drustva-vise-od-3-000-svedocenja-gradjana-i-gradjanki-srbije/

[28] European Court of Human Rights, Interim measure granted concerning Serbia (Đorović and Others v. Serbia), 30 April 2025. https://www.echr.coe.int/w/interim-measure-granted-concerning-serbia

[29] Civic Initiatives, Three Freedoms Under the Magnifying Glass. https://www.gradjanske.org/en/category/news/three-freedoms-under-the-magnifying-glass/

police force, with more forceful interventions reported during politically sensitive events in Republika Srpska. In 2025, courts acquitted the activists who had been charged with misdemeanours for disturbing public order during the May 2024 "Funeral of Democracy" performance against the "foreign agents" bill in front of the National Assembly of Republika Srpska. Surveillance concerns further shadowed assemblies in Serbia, including the potential use of facial-recognition technologies and drones. Media access also varied sharply. No restrictions were identified in Albania, while in Serbia journalists covering protests faced repeated obstruction, attacks and, in some cases, police detention. Concerns about journalists' safety were also reported in Bosnia and Herzegovina.

In Türkiye, the gap between formal guarantees and practice remained pronounced throughout 2025, as authorities repeatedly imposed **blanket or broad restrictions on assemblies** and used administrative and criminal measures against protesters. The legal framework governing freedom of assembly remained unchanged in 2025, while restrictions and interventions in practice continued. Authorities imposed broad restrictions on assemblies and demonstrations, including the February protests in Van, the March 8 Feminist Night March, the demonstrations following the detention of Istanbul Mayor Ekrem İmamoğlu, May Day demonstrations, and Pride and Trans Pride marches. Notably, for the first time in the history of Pride marches in Türkiye, three people were arrested for their participation in the İstanbul Pride March. According to reports by human rights organisations, in 2025, provincial authorities in 13 provinces imposed bans on all forms of demonstrations and events through 19 separate decisions, amounting to 126 days of restrictions. Law enforcement intervened in at least 268 demonstrations, during which 131 people were injured and at least 8,477 people were detained.[30] The exercise of the right was further constrained by practices extending beyond the immediate policing of demonstrations, including preemptive house raids, the use of surveillance and facial recognition technologies, and restrictions on digital communications used for protest coordination.

The regional comparison leaves little ambiguity. Albania and Kosovo demonstrated that notification requirements and public-order responsibilities can coexist with peaceful, unrestricted and sometimes creative civic mobilisation. North Macedonia showed that assemblies may proceed without formal obstruction while still being undermined through delegitimising rhetoric. Gradual legal harmonisation in parts of Bosnia and Herzegovina offered limited progress against an otherwise fragmented framework, reinforced by a Prijedor court ruling recognising spontaneous protest as protected under Article 11 of the European Convention on Human Rights. Serbia, however, demonstrated how a constitutionally guaranteed freedom can be hollowed out through criminalisation initiatives, excessive policing, selective protection and the absence of accountability. Türkiye reflected this dynamic as well, with a legal framework permitting preemptive restrictions on assemblies, coupled with province wide bans and mass detentions, significantly constrained the practical exercise of freedom of assembly. The true measure

[30] Human Rights Foundation of Turkey and Human Rights Association, 2025 fact sheet. https://tihv.org.tr/wp-content/uploads/2025/12/Verilerle-2025-yili-İnsan-Hakki-İhlalleri.pdf

of freedom of assembly is not whether it appears in constitutional and legislative provisions, but whether people can gather, protest and challenge those in power without facing violence, retaliation or criminal sanction.

1.2.2. Freedom of Expression

Freedom of expression is another area that falls within the scope of constitutionally guaranteed freedoms throughout the region. At the same time, despite generally solid legal frameworks and their broad alignment with international standards, this is the freedom for which some of the greatest discrepancies between regulation and implementation were recorded in 2025.

Defamation remains a criminal offence in Albania and in the Republika Srpska entity of Bosnia and Herzegovina, despite attempts to move towards decriminalisation. In Albania, legislative initiatives during 2025 fell short of fully removing criminal defamation provisions, while in Republika Srpska the offence and its chilling potential remained in place although the overall number of defamation reports decreased in 2025, the District Prosecutor's Office in Trebinje recorded a continuous increase in reports against media, and at least 11 criminal cases against media have been recorded since recriminalisation in 2023. Türkiye illustrates a similar pattern as defamation-related offences, including insult, insulting the President, publicly degrading the Turkish nation, and publicly degrading the religious values of a section of the public, continue to be enforced in practice.

Serbia faced a different form of **legislative pressure** through proposed amendments to the Law on Public Order and Peace and the Criminal Code that would extend public-order offences to conduct on social media, allowing online insults, threats and broadly defined "indecent and insolent behaviour" to be treated as misdemeanours. The proposals raised particular concern in light of arrests and detentions linked to social-media activity during recent environmental and student protests. A comparable practice had already materialised at local level in Bosnia and Herzegovina, where a Kakanj municipal decision adopted in March 2025 allowed insults, threats and hate speech on social media to be sanctioned;[31] 11 misdemeanour orders for online comments were issued within a year,[32] prompting concerns from the OSCE and journalists' associations about a chilling effect on legitimate criticism.

Kosovo recorded a different legal development in 2025. The Constitutional Court annulled the 2024 Law on the Independent Media Commission[33] after finding several provisions unconstitutional, including provisions concerning the composition and powers of the

[31] BH Journalists Association, Kakanj Municipality and Local Police Are Stifling Freedom of Expression, 27 August 2025. https://bhnovinari.ba/en/2025/08/27/bh-journalists-kakanj-municipality-and-local-police-are-stifling-freedom-of-expression/

[32] BH Journalists Association, Call for the Removal of a Disputed Provision from the Public Order Decision of the Municipality of Kakanj, 27 November 2025. https://bhnovinari.ba/en/2025/11/27/bh-journalists-call-for-the-removal-of-a-disputed-provision-from-the-public-order-decision-of-the-municipality-of-kakanj/

[33] Constitutional Court of Kosovo, Judgment in Cases No. KO152/24 and KO158/24, 19 May 2025. https://gzk.rks-gov.net/ActDetail.aspx?ActID=105942

regulator, licensing and sanctions. The Law had previously raised concerns among journalists and civil society regarding media freedom and regulatory independence.

SLAPPs continue to represent one of the most persistent shared threats to the otherwise generally enabling legal environment. Without formal legal recognition or adequate safeguards against abusive proceedings, activists, CSO representatives, journalists and citizens speaking on matters of public interest remain exposed to litigation intended to intimidate, exhaust or silence them. Cases or growing concerns were documented in Albania, Montenegro, North Macedonia and Serbia, particularly affecting journalists,[34] investigative media, environmental activists[35] and other public-interest actors.[36] pointing in the same direction: legal proceedings are increasingly being used not only to resolve disputes but to raise the personal and financial cost of public criticism.

Practice varied considerably between countries. In much of the region, the environment remained generally enabling but marked by persistent challenges, isolated **incidents and growing pressure on journalists, activists and organisations** addressing politically sensitive issues. Threats of legal action were the dominant form of pressure reported against civil society in Montenegro. In North Macedonia, the physical and digital safety of media workers came under pressure through coordinated public targeting[37] and smear campaigns[38] focused particularly on investigative and independent outlets, representing a wider deterioration in the environment for independent reporting and critical expression. A disabling environment persisted in Bosnia and Herzegovina, illustrated by a physical attack on journalist that resulted only in a misdemeanour order, and by more than 50 lawsuits filed against one investigative outlet, and the arrest in Trebinje of journalist Nataša Miljanović Zubac,[39] suspected of disclosing classified information in connection with her investigative reporting, despite the legal exemption for public-interest disclosures. In Republika Srpska, the announced establishment of a government department for combating "disinformation and lies", without clear safeguards or independent oversight, raised further concern. In Türkiye, the physical safety of journalists remained a critical concern, characterized by physical assaults, detentions, and various barriers encountered during reporting. These cases demonstrate how physical attacks, limited institutional

[34] The Daphne Caruana Galizia Foundation on behalf of CASE, A 2025 Report on SLAPPs in Europe: Democracy in the Dock. https://www.the-case.eu/wp-content/uploads/2026/01/CASE-2025-Report-layoutted-vf.pdf
[35] Civil Rights Defenders, Human Rights Defender Report for Albania – 2025. https://acqj.al/wp-content/uploads/2026/05/HRD-Albania-2025-updated.pdf
[36] SLAPP database. https://slapp.rs/en/slapp-db/
[37] Association of Journalists of Macedonia and Independent Union of Journalists and Media Workers, Condemnation of Malicious Targeting of Journalists and Media, 26 February 2025. https://znm.org.mk/en/ajm-and-ssnm-condemnation-of-malicious-targeting-of-journalists-and-media-by-dragan-pavlovich-latas/
[38] SafeJournalists Network, Condemnation of Social Media Smear Campaign, 27 February 2025. https://safejournalists.net/alert/safejournalists-condemnation-of-social-media-smear-campaign-sexist-attacks-and-threats-to-journalists-safety-in-north-macedonia/
[39] Media Freedom Rapid Response, Bosnia and Herzegovina: We demand immediate release and charges to be dropped for journalist Nataša Miljanović Zubac, 8 August 2025. https://www.mfrr.eu/bosnia-and-herzegovina-we-demand-immediate-release-and-charges-to-be-dropped-for-journalist-natasa-miljanovic-zubac/

responses and repeated litigation can operate together to narrow the space for investigative reporting and public-interest criticism.

In Türkiye, existing criminal and administrative mechanisms continued to be extensively used against journalists and people expressing critical views. According to human rights organisations, at least 303 journalists were subjected to judicial harassment during the year, with 42 journalists detained and 28 remaining in detention at the end of 2025. At least 507 people were detained and 109 arrested in connection with the expression of their views, while hundreds more faced investigations or criminal proceedings. Charges relating to membership of or propaganda for an organisation, insulting the President, spreading allegedly misleading information, and incitement to hatred or hostility were among those most frequently used against journalists and other individuals. The broadcasting regulator authority imposed 99 sanctions on media outlets, resulting in approximately TRY 146.7 million in fines.

The most **severe and systematic deterioration** was once again recorded in Serbia, where monitoring documented 309 violations of the right to freedom of expression during 2025.[40] The national monitoring found that 45% of surveyed organisations had faced some form of pressure for critical speech against public authorities or individuals, including intimidation, threats of persecution and censorship. Organisations were exposed to pressure because of advocacy aimed at changing public policies, persecuted for critical speech, or faced sanctions, including fines or imprisonment, for speaking against state policies. Around 35% of the organisations surveyed reported self-censoring their activities or public statements because they feared further pressure.

These figures sit within a public discourse dominated by narratives portraying civil society organisations as “foreign mercenaries,” “Soros operatives” and “enemies of the state.” Crucially, these labels are not confined to marginal or anonymous actors but are promoted by the highest-ranking government officials and amplified through media with national reach. The result is not only direct pressure on individual organisations but an environment in which smear campaigns, institutional measures, legal sanctions and the threat of persecution gradually make self-censorship appear rational.

Self-censorship consequently emerged as an important indicator of the wider chilling effect in several countries: even where organisations were not formally prevented from speaking, the prospect of litigation, institutional retaliation, public targeting or personal attacks influenced whether and how critical views were expressed.

The defining contradiction of 2025 is therefore that freedom of expression remains legally guaranteed while becoming increasingly costly to exercise. In the more severe cases, the pressure no longer consists of isolated hostile statements or individual lawsuits. Criminal and misdemeanour provisions, SLAPPs, coordinated smear campaigns, physical attacks, financial pressure and public labelling reinforce one another. The damage is visible not only

[40] Civic Initiatives, Three Freedoms Under the Magnifying Glass. https://www.gradjanske.org/en/category/news/three-freedoms-under-the-magnifying-glass/

in the number of violations but in the organisations and individuals who begin to speak less, avoid certain subjects or withdraw from public debate because the personal and institutional consequences have become too high.

1.2.3. Open, Safe and Secure Civic Spaces

Civic space and its safety varied considerably across countries. While legal frameworks provide general, but inconsistent, protections for online and offline civic activity, the principal challenges emerged in practice through threats and harassment, hostile political and media narratives, digital insecurity and, in the most serious cases, surveillance and direct institutional pressure. A defining deterioration of 2025 was the withdrawal and suspension of United States foreign assistance which became a major catalyst for reinforcing existing narratives portraying foreign supported CSOs, journalists and activists as politically motivated or hostile to national interests in several countries.

Legal frameworks provide **general protections** related to physical safety, privacy, personal data and cyber security, but rarely contain safeguards tailored to the threats faced by CSO representatives, activists and human rights defenders. In Albania, the framework does not specifically address online and offline threats, harassment and attacks against civic actors, although the adoption of the National Cyber Security Strategy 2025–2030 and its Action Plan[41] strengthened the broader framework for digital protection. Bosnia and Herzegovina also strengthened its legal framework in 2025 through a new Personal Data Protection Law,[42] bringing privacy protections closer to EU and GDPR standards and recognising the need to balance data protection with freedom of expression and access to information. Its practical effect remains uncertain, however, and gaps persist in the regulation of artificial intelligence, digital services and cybersecurity. Overall, recent reforms have improved general protections without yet providing comprehensive safeguards tailored to the risks faced by civil society online and offline. In Türkiye, the framework provides general safeguards for personal data, privacy and cybersecurity, but does not provide comprehensive protections for the specific risks faced by civil society actors. In March 2025, legislators adopted a new Cyber Security Law, Law No. 7545, whose broadly and vaguely defined provisions have raised concerns among civil society about their potential use to further curtail free expression and privacy online.[43]

Against this largely unchanged legal background, the **withdrawal and suspension of United States foreign assistance** at the beginning of 2025 became a turning point in practice, with its consequences going far beyond the loss of funding. In Albania, this

[41] National Authority for Cyber Security, National Cyber Security Strategy 2025–2030 and Action Plan 2025–2027. https://aksk.gov.al/en/the-national-cyber-security-strategy-2025-2030-and-action-plan-are-approved/
[42] Law on Personal Data Protection of Bosnia and Herzegovina, Official Gazette of BiH No. 12/25.
[43] Freedom House, Freedom on the Net 2025: Turkey. https://freedomhouse.org/country/turkey/freedom-net/2025

translated into an unprecedented campaign of disinformation, defamation and politically inspired attacks against civil society. **Smear campaigns** particularly targeted organisations working on human rights, gender equality and LGBTI rights.[44] Although no internet shutdowns, platform bans or state-imposed restrictions on online platforms were recorded, the absence of formal digital restrictions did not prevent online spaces from becoming channels for harassment, hate speech and reputational attacks.

A similar narrative intensified in Bosnia and Herzegovina, where CSOs and activists receiving foreign support were increasingly described as "foreign mercenaries" or actors serving outside interests. Right-wing political actors used the withdrawal of USAID support to strengthen an already familiar "foreign agents" narrative. The scale of the rhetoric was strikingly disconnected from the facts: only around 3% of surveyed organisations had received USAID funding directly, while most USAID support in the country had been directed towards institutions rather than CSOs. **Inspections of foreign-funded organisations** conducted during the year found no irregularities. Neither fact prevented the funding withdrawal from being used to cast suspicion over a much wider segment of civil society. In North Macedonia, similar delegitimising narratives extended to independent journalists and media organisations, including through coordinated social-media targeting and the misuse of private photographs to discredit journalists and investigative outlets.[45] Kosovo also recorded a serious case of **media-led targeting** involving NGO Aktiv and its Executive Director. Reporting linked the Executive Director to a Croatian espionage investigation[46] and combined this with Aktiv's research on the Kosovo Police,[47] placing the organisation within a wider espionage narrative without presenting evidence for the allegations. The resulting narrative raised concerns about staff safety and disrupted the organisation's work, illustrating how civic activity on politically sensitive issues can be reframed through narratives of foreign influence, ethnic disloyalty or security risk. A comparable narrative was observed in Türkiye, where civil society organisations relying on international funding continued to be portrayed as foreign agents. Civil society actors publicly raised concerns that such unsubstantiated allegations risked **damaging the reputation of legitimate institutions**, noting that funding options available to CSOs already remained scarce and insufficiently diversified.

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[44] European Commission, Albania 2025 Report, SWD(2025) 750 final. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en?filename=albania-report-2025.pdf

[45] Association of Journalists of Macedonia and Independent Union of Journalists and Media Workers, Condemnation of Malicious Targeting of Journalists and Media, 26 February 2025. https://znm.org.mk/en/ajm-and-ssnm-condemnation-of-malicious-targeting-of-journalists-and-media-by-dragan-pavlovich-latas/

[46] Večernji list, Partnerica hrvatskog pilota radila u međunarodnim misijama na Kosovu, 27 August 2025. https://www.vecernji.hr/vijesti/partnerica-hrvatskog-pilota-radila-u-medunarodnim-misijama-na-kosovu-imala-bliske-veze-s-mnogim-eulex-sucima-i-tuziteljima-1886710

[47] NGO Aktiv et al., Ethnization of Kosovo Police, December 2024. https://ngoaktiv.org/wp-content/uploads/2024/12/Ethnization-of-Kosovo-Police-ENG-1_compressed-1.pdf

In Serbia, this narrative escalated into direct institutional action. On 25 February 2025, police raided the premises of five organisations[48] as part of an investigation into alleged misuse of USAID funding. The raids targeted organisations openly documenting democratic backsliding, rule-of-law failures and declining media freedom, [49] demonstrating how hostile narratives around foreign funding could translate into direct state pressure.

Available evidence also points **to heightened risks for organisations and defenders working on gender equality, women's rights and LGBTI rights**. In Albania, for example, half of 22 surveyed women human rights defenders reported harassment or threats.[50] The study also documented smear campaigns and derogatory labelling of defenders as "anti-family", "foreign agents" or "Soros-funded". The findings illustrate how political delegitimisation can intersect with misogyny, homophobia and hostility towards foreign support, creating compounded risks for already exposed civic actors. In Türkiye, the government's "Year of the Family" then expanded into the "Decade of the Family" initiative for 2025 similarly framed gender equality and LGBTI rights defenders as a threat to "public morality" and "traditional family values." Throughout 2025, the government leaked multiple anti-LGBTI draft bills to the media, specifically targeting the LGBTI community, human rights defenders, and civil society organisations (CSOs) advocating for gender equality. The proposed legislative amendments pose significant threats to the fundamental rights of the LGBTI community and CSOs, especially those providing essential services like counselling, healthcare access support, and legal assistance to LGBTI people, may face severe restrictions or potential dissolution cases under these amendments. Although the draft amendment was not adopted in parliament, this environment exposed women's and LGBTI rights defenders and CSOs to significantly heightened pressure, including public targeting, administrative restrictions and judicial harassment.[51]

Digital insecurity was also evident across several countries. CSOs reported online threats and harassment, blocking or hacking of communication channels and other forms of disruption in Bosnia and Herzegovina, North Macedonia, Türkiye, and Montenegro. These developments rarely amounted to systematic state restrictions on internet access or online platforms, but they demonstrate that formal access to digital civic space does not necessarily make that space safe or secure. However, Türkiye stands out for the scale and intensity of these restrictions, with authorities repeatedly disrupting access to social media platforms during periods of heightened political activity and imposing blocking orders.

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[48] N1, Tužilaštvo proverava rad pojedinih NVO, policija ušla u nekoliko kancelarija, 25 February 2025. https://n1info.rs/vesti/tuzilastvo-proverava-rad-pojedinih-nvo-policija-usla-u-nekoliko-kancelarija/
[49] Balkan Civil Society Development Network, BCSDN Condemns Targeted Institutional Pressure on Civic Initiatives and Civil Society in Serbia, 26 February 2025. https://balkancsd.net/bcsdn-condemns-targeted-institutional-pressure-on-civic-initiatives-and-civil-society-in-serbia/
[50] Albanian Women Empowerment Network (AWEN), Women as Human Rights Defenders in Albania, 2025. https://awenetwork.org/media/682f2843bb7b1.pdf
[51] ICNL, Civic Freedom Monitor: Türkiye. https://www.icnl.org/resources/civic-freedom-monitor/turkiye

Amongst other examples of this situation taking place, in March 2025, major platforms and messaging services were throttled for approximately 42 hours, [52] while hundreds of accounts were subsequently subjected to blocking orders. The restrictions followed the arrest of Istanbul Mayor Ekrem İmamoğlu and other opposition figures, which triggered mass protests. Around 700 accounts on X, including those of journalists, media outlets and CSOs, were blocked at the request of the authorities, [53] while at least 329 people were subsequently detained over social media posts related to the protests. [54]

Surveillance represented a particularly serious concern in Serbia. Cases documented during 2025 included the installation of spyware on activists' devices, [55] attempted targeting of journalists with Pegasus[56] and extraction of data from the phones of detained protesters. [57] No comparable pattern of unjustified state surveillance was documented elsewhere in the region, although concerns about the adequacy of safeguards surrounding surveillance and emerging technologies persisted in several countries. More broadly, legal safeguards governing AI, biometric identification and other emerging surveillance technologies remained incomplete across much of the region, leaving important gaps in transparency, rights-impact assessment and effective redress.

The central development of 2025 was therefore not the adoption of legislation explicitly closing civic space. It was the creation of a political and social environment in which existing legal protections became less meaningful. Once foreign support was reframed as evidence of illegitimacy, attacks on civil society could be presented as **scrutiny, harassment as public criticism and institutional pressure** as accountability. Political rhetoric, media amplification, digital harassment, gendered attacks and, in the most serious cases, direct state action increasingly reinforced one another, weakening the safety and legitimacy of independent civic actors. A recurring weakness was the response after threats or attacks occurred: available evidence points to gaps in reporting, protection, investigation and accountability, meaning that general criminal-law and institutional remedies did not consistently translate into effective protection for civic actors. This directly creates a **chilling effect**: where civic actors can be portrayed as foreign-controlled, socially dangerous or politically illegitimate, harassment can be normalised as criticism and institutional pressure presented as accountability.

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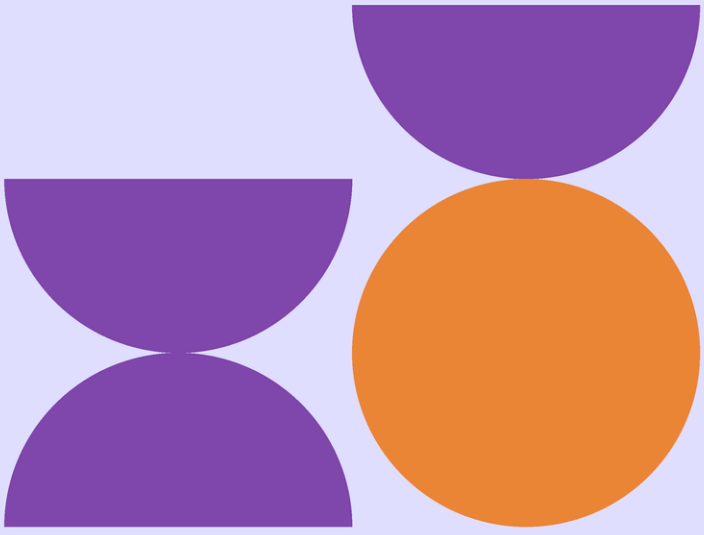
[52] Bianet, Turkey lifts social media restrictions after Istanbul mayor's arrest. https://bianet.org/haber/turkey-lifts-social-media-restrictions-after-istanbul-mayors-arrest-while-dozens-detained-over-posts-305666
[53] International Press Institute, IPI condemns social media restrictions following Istanbul mayor's detention. https://turkiye.ipi.media/?p=2064
[54] ICNL, Civic Freedom Monitor: Türkiye. https://www.icnl.org/resources/civic-freedom-monitor/turkiye
[55] BIRN, I seljaci pod nadzorom: BIA ubacivala špijunski softver u telefone poljoprivrednika, 4 December 2025. https://birn.rs/bia-spijunirala-poljoprivrednike-novispy/
[56] Amnesty International Security Lab, Serbia: Journalists targeted with Pegasus spyware, March 2025. https://securitylab.amnesty.org/latest/2025/03/journalists-targeted-with-pegasus-spyware/
[57] BIRN, Nova žrtva špijunskog nadzora: Student priveden na šest sati, telefon mu hakovan, 28 February 2025. https://birn.rs/student-spijunski-nadzor-hakovan-telefon/

Area 2: Framework for CSO Financial Viability and Sustainability

2.1 Tax/Fiscal Treatment for CSOs and Donors



2.1.1. Tax benefits

Tax benefits for CSOs exist across the region, particularly for grants, donations and other traditional non-profit income, although their scope and conditions differ considerably. Fiscal treatment of income from economic activities is less favourable and often subject to thresholds, eligibility conditions or general taxation.

Tax rules applying to CSO income and economic activities remained largely unchanged across the region in 2025. Available exemptions continued to differ between countries and were often conditional on the source and use of income, the organisation's status or the limits placed on its economic activities. Albania recorded a positive procedural development, as clearer procedures introduced in February made VAT exemption certificates for grant agreements funded through bilateral agreements between the Albanian government and foreign governments and ratified by Parliament, addressing a long-standing implementation problem for civil society.

Yet, in most of the countries, tax treatment of economic activities remains considerably less enabling, as exemptions or favourable treatment are limited, with administrative requirements, eligibility thresholds and uncertainty reducing their value as a source of sustainable CSO income. While CSOs are generally legally permitted to receive grants, and no hidden taxation was reported in most countries, the practical financial conditions attached to such funding can create additional burdens, particularly through taxation. Serbia was a notable exception in practice, where some CSOs reported special or higher charges on foreign funds, although other banking and administrative restrictions affecting donor funds fall outside taxation in the strict sense. In Türkiye, tax benefits remained tied to public benefit or tax exempt status, held by only a small group of associations and foundations, leaving the vast majority of CSOs without access to any tax advantages. Even the benefits available to associations and foundations holding these statuses remained limited, providing insufficient support for CSOs' financial viability.

The wider challenge is the distance between the formal availability of tax benefits and the **ability of CSOs to understand, access and use them**. In Kosovo, 43.3% of surveyed CSOs considered the relevant procedures very or somewhat complicated, while in North Macedonia, almost 30% of surveyed CSOs were unaware of the tax benefits available to them use was heavily concentrated on VAT exemptions for donor-funded projects. These findings suggest that formal availability does not necessarily translate into accessible or widely used fiscal support.

Even Albania's positive procedural development regarding **VAT exemptions** revealed the importance of effective implementation. Some CSOs reported that private service providers sometimes were reluctant or refused to apply the exemptions because of limited awareness or understanding of applicable requirements. CSOs consequently had to explain these requirements and assist providers in navigating the process. These findings highlight the need for consistent application of the exemption procedure and clearer guidance for private service providers to ensure that CSOs can access the benefit without having to explain and facilitate the process themselves.

2.1.2 Incentives for individual and corporate giving

Incentives for individual and corporate giving remained limited and largely unchanged across the region in 2025. Existing frameworks generally favour corporate giving, restrict deductions to selected areas of public interest and provide little or no support for donations by individual citizens. Unlike the rest of the countries, Albania and Serbia do not recognise individual donations for tax deduction purposes, while in Bosnia and Herzegovina such relief is available only to self-employed individuals rather than citizens generally. Corporate incentives are more widely available across the region, but their scope differs and often excludes relevant areas of civil society activity. In Albania, for example, eligible activities do not include democracy and human rights,[58] while in Serbia the lack of clear indicators for determining deductions in individual cases reduces the framework's stimulating effect on corporate donors. In Türkiye, tax benefits apply only to individual or corporate donations made to associations and foundations with specific status, yet less than 1% of all such organisations hold that status.

The practical value of the available incentives was further constrained in several countries by **procedural uncertainty and insufficient policy support** for cooperation between civil society and the private sector. Bosnia and Herzegovina continued to lack a functional, simplified procedure for claiming deductions, while Montenegro's framework remained unclear on the treatment of institutional grants to CSOs. Albania still lacked a dedicated policy framework for structured cooperation between NPOs and the private sector, while Serbia did not recognise public-benefit organisation status.

These limitations were not uniform across the region: Kosovo maintained a clearly regulated procedure for sponsorship certificates, while in North Macedonia proposed reforms to its underused framework remained stalled throughout 2025. In North Macedonia, the framework formally provides incentives across a relatively broad range of public-benefit activities, but their use remains constrained by burdensome procedures requiring administrative confirmation of the public-interest character of donations.[59] Amendments to its underutilised tax framework aim to clarify procedures, strengthen transparency and accountability, and reduce corruption risks associated with granting tax incentives. At the same time, proposed changes to the Law on Associations and Foundations[60] would replace public-benefit organisation status with defined areas of public interest, potentially allowing organisations operating in those areas to benefit equally.

In Türkiye, although procedures for donors are clearer, burdensome documentation to claim deduction is still a challenge especially for individual donors. Exclusion of individuals

[58] Draft Law On Donations and Sponsorships in the Republic of Albania, February 2026. https://www.konsultimipublik.gov.al/Konsultime/Detaje/920

[59] State Commission for Prevention of Corruption, Opinion No. 11-955/2, 16 September 2024. https://dksk.mk/wp-content/uploads/2024/09/11-955-2-2.pdf

[60] Ministry of Justice of North Macedonia, Law Amending and Supplementing the Law on Associations and Foundations (ENER). https://ener.gov.mk/default.aspx?item=pub_regulation&subitem=view_reg&itemid=Ph7497peuuifPGSWtM7xZw==

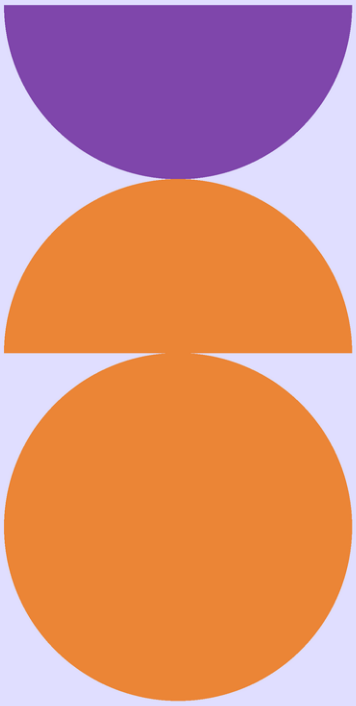
who are unable to file income tax returns are from the tax benefit system, severely limiting accessibility. Additionally, both the fact that these statuses are granted following a politically biased, bureaucratic, and time-consuming process, and the fact that tax incentives are provided only for donations made to organisations holding these statuses, prevent watchdog organisations from benefiting from state support through these donations and also limit the donors' autonomy by directing their donations to specific entities. The fact that tax incentives are available only for donations made to a very small number of CSOs authorized by the government not only excludes watchdog organisations from this system but also interferes with donors' will by directing them exclusively toward certain CSOs.

In Kosovo, the sponsorship framework provides tax incentives in sport, culture and youth,[61] and reported use of these incentives continued to grow in 2025.[62] However, the absence of information on recipient organisations and the distribution of support across eligible fields prevents a fuller assessment of how far these incentives benefit civil society. More broadly, across the region, systematic state policies promoting cooperation between civil society and the private sector remained weak or absent, meaning that tax incentives were rarely complemented by broader measures to stimulate philanthropy and cross-sector partnerships.

Overall, the regional frameworks remain **insufficient to stimulate diversified philanthropy**. Individual giving receives especially limited recognition, while corporate incentives are narrowly defined and weakened by unclear criteria, complicated procedures and inadequate support for cross-sectoral cooperation. Kosovo provides an example of a sponsorship framework with growing reported use, but the broader regional environment has yet to become an effective instrument for systematically encouraging private support to civil society.

[61] Regulation (MCYS) No. 01/2024 on the Criteria, Procedures and Form of Sponsorship Certificate in the Field of Culture, Youth and Sport. https://gzk.rks-gov.net/ActDetail.aspx?ActID=91777
[62] Tax Administration of Kosovo, Tax Benefits Realised through the Implementation of the Law on Sponsorships, 1 July 2026. https://www.instagram.com/p/DaP7e-HjvEv/?img_index=2

2.2 State Support



2.2.1. Availability of public funding

Public funding is not entirely absent from the region, but it does not function as a predictable or needs-based system of support for civil society. In 2025, it remained fragmented, distributed by numerous institutions and levels of government, and largely project-based. Budget classifications frequently combine CSOs with churches, sports associations, public institutions and other legal entities, making it impossible to identify how much funding is genuinely available to civil society. In Bosnia and Herzegovina, no aggregate figure on public funding to CSOs for 2025 could be established at all, as consolidated data across levels of government do not exist The result is a system in which formal allocations exist, but their scale, reach and contribution to CSO sustainability remain difficult to assess.

Available mechanisms also respond poorly to the sector's operational and institutional needs. **Funding priorities** are commonly aligned with government-defined objectives, while institutional support and co-financing opportunities remain limited or absent. In Albania, support is available through central and local institutions but remains insufficient, particularly for organisations providing services to marginalised groups. Survey findings elsewhere reveal the same mismatch between formal availability and actual reach. In Serbia, only six of the 31 surveyed organisations received state funding for projects or activities, and none reported that it covered a significant share of their budget. In Kosovo, 22.4% of surveyed CSOs received public funding, while 20.4% applied unsuccessfully. In North Macedonia, 60% of surveyed CSOs received no state support during 2025. In Bosnia and Herzegovina, 53% of surveyed CSOs received some form of state support, predominantly project-based, while only three organisations received institutional grants.

CSO involvement in determining funding priorities also remained limited. Although consultation is formally envisaged in some funding systems, priorities continued to be predominantly defined by public authorities, with weak or inconsistent participation of civil society in identifying sectoral funding needs.

Some developments demonstrated greater recognition of the **need for reform** without yet resolving the underlying structural problems. Bosnia and Herzegovina's first Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029 includes measures to improve the framework and practice for allocating public funds.[63] North Macedonia also planned a state-backed guarantee fund to support the co-financing requirements of projects funded by the European Union and other international donors.[64] While this could improve access to international funding, its narrow focus cannot substitute for comprehensive reform of public financing for civil society. In Bosnia and Herzegovina, some municipalities, including Jablanica, Novo Sarajevo and Centar

[63] Council of Ministers of BiH, Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029. https://mpr.gov.ba/en/strategy-of-the-council-of-ministers-of-bih-for-creating-an-enabling-environment-for-the-development-of-civil-society-2025-2029

[64] MakPress, Mickoski: Professional and Sustainable Civil Sector as a True Partner, 27 November 2025. https://makpress.mk/2025/11/27/miczkoski-profesionalen-i-odrzhliv-graganski-sektor-koj-e-vistinski-partner-vo-kreiraneto-i-realizaczijata-na-drzhavnite-politiki/

Sarajevo, planned budget lines for co-financing EU and other donor-funded projects, but these remain isolated local examples rather than a systematic mechanism. Montenegro provided a limited positive exception in 2025, introducing a two-year programme supporting an NGO Resource Centre and, for the first time, grants that functioned in practice as institutional support for professional associations, although core funding is not formally recognised as a distinct funding category.

Even where the volume of funding increased, **predictability** did not necessarily improve. Kosovo reported growth in public funding between 2024 and 2025, but almost half of surveyed CSOs considered allocations partly or fully unpredictable based on the previous year. Late publication of calls, delays in contracting and disbursement, extensive documentation requirements and the concentration of grant agreements towards the end of the year continued to prevent organisations from planning their work with confidence. At the same time, 2025 saw some movement towards longer-term funding: the Ministry of Culture, Youth and Sports repeated its three-year institutional support scheme for arts and culture organisations for a second year, while the Ministry of Health introduced multi-year support for 11 public-health projects.[65] However, these arrangements remained concentrated in specific fields and institutions. In Albania, financial support to CSOs increased by 11.5% in 2025 compared with 2024, benefiting 75 organisations out of 160 applicants.[66] Despite this increase, the overall level of funding remains insufficient to meet the needs of the sector. In Montenegro, the late conclusion of contracts meant that projects funded in one year were frequently implemented primarily during the next. Funding that arrives too late or cannot be anticipated may be formally available, but it provides a weak foundation for organisational stability.

The most serious **discrepancy between formal availability and access in practice** was recorded in Serbia. Although the Law on Associations provides for the financing of programmes of public interest, no special mechanism has been established for allocating these funds. The principal budget line used for grants to non-governmental organisations also covers churches and sports associations, while funds are transferred to other legal entities without applying the regulation governing the financing of associations. CSOs may additionally receive support through several other budget lines, making it impossible to determine either the precise amount available to civil society or the number and scope of funding opportunities.

Similarly, Türkiye has no comprehensive document regulating state support. Since there is no specific budget line allocated solely to the civil society sector in the budgets of the central government and local administrations, it is not possible to accurately ascertain the exact amount of the public resources planned to be transferred to CSOs. Thus the lack of a comprehensive and transparent public funding mechanism leads to selective support,

[65] Ministry of Health of Kosovo, Ministry of Health Supports 11 NGOs for Public Health Projects in 2025, 1 July 2025. https://msh.rks-gov.net/Publications/Details/3445
[66] Agency for the Support of Civil Society, Annual Report 2025. https://amshc.gov.al/wp-content/uploads/2026/02/raporti-Vjetor-i-veprimtarise-AMSHC-per-vitin-2025_compressed.pdf

favoring CSOs aligned with the government while neglecting the sector's broader and diverse needs.

Focus group participants and interviewed experts in several countries confirmed that many independent CSOs have consequently **withdrawn from public funding processes** and no longer apply to calls issued by ministries. Delayed calls, requirements for formally certified documentation, delays in signing contracts and disbursing funds, and inconsistent implementation of regulations further restrict access and undermine organisational sustainability. The principal challenge is therefore not the formal existence of public funding but whether independent organisations can access it through procedures that are transparent, consistent and fair.

2.2.2. Distribution and Transparency of Public funding

The distribution of public funding is formally one of the more regulated aspects of state support. Laws, bylaws and grant-specific rules prescribe procedures, while open calls serve as the dominant allocation mechanism. This formal architecture, however, continues to conceal a much less orderly reality. Funding systems remain decentralised, rules differ between institutions and levels of government, and little progress was made in 2025 towards resolving previously identified problems with transparency, consistency and accountability.

Even basic **procedural compliance** remains uneven. For example, in Montenegro, the ministries that published calls included the legally required information, but none of the calls was published before the statutory deadline of 1 March. In Albania, none of the principal funding institutions examined disclosed all essential information on awarded grants. The Agency for the Support of Civil Society published the names of beneficiaries and awarded amounts but not sufficient information on project objectives and activities.[67] In Türkiye, the sole public financing program for supporting CSOs is implemented by the Directorate General for Relations with Civil Society under the Ministry of Interior. It is distributed by public call, and the total amount of assistance is annually declared, yet selection criteria and evaluation procedures, the list of funded projects, amounts per projects, beneficiaries or project goals are not publicly disclosed. Other ministries and public institutions also provide financial support to CSOs, but these processes are often conducted in a completely opaque manner, and it is not possible to obtain sufficient information about the amount of the allocated grants, beneficiaries and the purpose of support.

Mechanisms for challenging decisions also appear to provide limited redress. Two complaints concerning Albania's 2025 funding procedure did not result in the re-evaluation of either application. Similar uncertainty was recorded elsewhere, as some institutions reported complaints without providing sufficient information on whether or

[67] Agency for the Support of Civil Society, Annual Report 2025. https://amshc.gov.al/wp-content/uploads/2026/02/raporti-Vjetor-i-veprimtarise-AMSHC-per-vitin-2025_compressed.pdf

how they had been resolved. The right to complain has limited corrective value when the procedure provides no clear indication that decisions will be meaningfully reconsidered.

Application requirements constitute another widespread barrier, remaining burdensome or exclusionary in some systems. Calls in Bosnia and Herzegovina sometimes restrict eligibility to organisations formally registered in a particular municipality, excluding CSOs registered elsewhere even when they work with local beneficiaries or partners. Requirements for certified copies, original documents, municipal certifications, signed and stamped declarations, financial statements and previous reports place a disproportionate burden on smaller organisations. Half of surveyed recipients in Bosnia and Herzegovina considered the requirements difficult.

Kosovo presents a comparatively more positive picture, with 66.6% of surveyed CSOs considering the selection criteria clear and publicly accessible and 72.1% considering the application requirements manageable. Qualitative research nevertheless found that standardised procedures placed a heavier burden on smaller and newer organisations, as well as women's rights, LGBTI and minority-led organisations. Formally standardised requirements can therefore produce unequal effects when organisations enter the process with vastly different capacities and resources.

The most serious concerns were recorded in Serbia, where three public calls revealed systemic weaknesses and potential misuse of nearly 90 million dinars, approximately €770,000, in a single open call.[68] Problems were not isolated procedural errors but included insufficient transparency, questionable eligibility checks and funding of politically connected groups. Assessment criteria also gave very limited weight to relevant experience and expertise, allowing organisations without a track record in specialised fields to receive funding, a particular concern in sensitive areas such as support for victims of violence.

Perceptions of fairness remain fragile even where procedures appear clearer and **conflict of interest safeguards** are inconsistently implemented. Kosovo has comparatively clear formal rules on declaration and recusal, yet surveyed organisations remained almost evenly divided over whether final decisions were fair and free from conflicts of interest. In Bosnia and Herzegovina, where safeguards and procedures vary across levels of government, only 34% of surveyed funding recipients considered decisions unbiased. Voluntary transparency guidelines developed by the Agency for Prevention of Corruption and Coordination of the Fight Against Corruption and Transparency International BiH represent a positive tool, but their application produced no notable early results. In Türkiye, eligibility criteria are not challenging and application procedures are not burdensome. However, the fact that the distribution procedure is left to the discretion of public institutions results in CSOs that are critical of the government to be reluctant to apply as interviews indicate.

[68] BIRN, Lažirane isplate, fiktivna predavanja: Kako su milioni evra za ugrožene završili u tuđim džepovima, 21 November 2025. https://birn.rs/milioni-evra-izvuceni-na-javnim-konkursima-za-mlade-i-decu/

The **credibility of public funding systems** is increasingly affected by the behaviour they produce among CSOs. In Albania, interviews and focus groups indicated that some organisations refrain from applying because they doubt the fairness and effectiveness of the procedures. In Montenegro, the decentralised allocation model has encouraged the emergence of "catch-all" organisations that apply across multiple policy areas and receive funding while specialised CSOs are left unsupported. The withdrawal from public calls is most severe in Serbia, where long-standing concerns about funding directed towards organisations close to the government, including GONGOs and so-called phantom organisations, have discouraged independent CSOs from participating.

Beyond this structural opacity, CSOs have for years reported non-transparent calls through which funds are directed towards organisations close to the government, including GONGOs and so-called phantom organisations. Cases have been documented in which grants and subsidies appeared to be concentrated among a limited number of organisations, including some that reportedly did not meet formal eligibility requirements. Criminal complaints have been filed in some instances, but many cases have not received a final judicial resolution.

The existence of open calls and procedural rules cannot, by itself, **guarantee transparent or equitable distribution**. Late calls, incomplete disclosure, burdensome or exclusionary requirements, weak complaint mechanisms, inconsistent conflict-of-interest safeguards and questionable selection criteria continue to undermine trust. Where these weaknesses repeatedly favour politically connected or insufficiently qualified organisations, limited public resources are diverted away from experienced and independent CSOs, while the organisations most likely to question the process are gradually discouraged from entering it at all.

2.2.3. Accountability, M&E of public funding

Across the region, accountability mechanisms are considerably more developed at the level of individual grants than at the level of the public funding system as a whole, except Türkiye in which there are fragmented regulations that fail to develop a common approach among public institutions and ensure transparency and accountability for both central and local governments. CSOs receiving public funds are generally required to document expenditures, submit financial and narrative reports and demonstrate compliance with approved activities and budgets. The principal weakness lies further along the accountability chain: monitoring of implementation varies considerably between institutions, while regular evaluation of the broader effectiveness and impact of public funding remains exceptional.

Legal frameworks also generally prescribe **sanctions for misuse of public funds**, although their proportionality and the availability of corrective remedies are not equally clear across all systems. No evidence from 2025 suggests that sanctions themselves constituted the principal regional obstacle; the larger weakness remained the inconsistent monitoring and evaluation needed to identify problems and assess results.

Project-level monitoring is carried out across the region, but its consistency and depth differ substantially. Kosovo has one of the clearest formal frameworks: funding institutions are required to monitor projects through submitted reports and on-site visits, while beneficiaries must report both on expenditure and progress towards project objectives.[69] Albania also provides evidence of comparatively regular grant-level monitoring by the Agency for the Support of Civil Society, including field monitoring, written feedback and generally positive experiences reported by funded CSOs.[70] However, publicly available information is insufficient to determine the share of projects receiving on-site monitoring under each funding call. Monitoring generally assesses compliance with approved proposals, budgets and contractual obligations, rather than the overall effectiveness and impact of public funding programmes.

Elsewhere, **monitoring practice** is more fragmented and depends heavily on the institution providing the funding. In Montenegro, for example, ministries reported using different approaches: from monitoring visits and standard forms and guidelines, to arrangements based exclusively on individual grant contracts. The late contracting further weakens meaningful oversight. Most grant contracts for 2025 were signed only in the final quarter of the year, while most projects funded in 2024 were implemented primarily during 2025. When contracting and implementation consistently spill into the following year, monitoring becomes another reactive administrative task rather than part of a coherent funding cycle. Türkiye only initiates monitoring in response to allegations, and no systemic evaluations of the effectiveness of public funding exist.

Serbia presents a clear discrepancy between the formal framework and its implementation. Survey findings indicate that monitoring is conducted only sporadically and is not consistently based on predetermined and objective indicators, while only five ministries confirmed that they had monitored projects financed by their institutions. Evaluation of the effects and impact of public funding is even weaker, remaining an occasional administrative exercise rather than systemic practice. Bosnia and Herzegovina shows a similar picture: among surveyed recipients of public funding, only 45% reported that implementation was monitored and 39% that monitoring followed predetermined criteria. The Federation's minimum standards for budget transfers require evaluation of effects and impact, but remain an isolated example, while public evaluation is limited to a few sectoral cases.

Weaknesses in **consolidated reporting** further limit accountability. In Kosovo, institutions published preliminary and final beneficiary lists, sometimes including scores or awarded amounts, but provided little information about the goals and activities of supported projects. Public access deteriorated further when the central platform for public financial support to NGOs stopped functioning in August 2025. The consolidated annual report was subsequently published later than required, excluded data from some responsible

[69] Regulation MF No. 04/2017 on the Criteria, Standards and Procedures for Public Financing of NGOs. https://gzk.rks-gov.net/ActDetail.aspx?ActID=14831
[70] Agency for the Support of Civil Society, Annual Report 2025. https://amshc.gov.al/wp-content/uploads/2026/02/raporti-Vjetor-i-veprimtarise-AMSHC-per-vitin-2025_compressed.pdf

institutions and acknowledged late, incomplete reporting and non-harmonised submissions. Once access to the platform was restored in 2026, the available 2025 data appeared more complete and consistent than the 2024 dataset, although gaps remained. Individual award notices therefore did not translate into a complete, timely and reliable public record of state support.

The imbalance is difficult to overlook: CSOs face established and often detailed obligations to prove financial and contractual compliance, while public authorities rarely demonstrate whether funding priorities were appropriate, results were achieved or public benefit was produced. Without systematic monitoring based on objective criteria, functioning public databases, timely consolidated reporting and regular impact assessments, accountability remains limited to checking documentation rather than learning whether the system works.

2.2.4. Non-financial support to CSOs

Public authorities throughout the region generally have some legal basis to provide CSOs with premises, equipment, logistical assistance, training and other institutional resources. What is largely missing is a system that turns this possibility into support available through clear criteria and predictable procedures. Non-financial assistance consequently remains one of the **least developed and most discretionary forms of state support**, dependent on the institution involved, the availability of public property and, particularly at the local level, political will.

The gap between legal possibility and institutional practice is especially visible in Serbia and Montenegro. Serbian legislation contains no separate procedure for allocating non-financial support to CSOs beyond the general provisions of the Law on Public Property,[71] and only one surveyed organisation reported receiving such assistance from a state authority. Montenegro formally allows state property to be made available to CSOs and permits ministries to provide other forms of support, but criteria and procedures remain inconsistent, particularly at local level, and responding ministries reported that they had not provided such assistance during 2025. Similarly, Türkiye has no regulation in place to ensure the transparent and objective allocation of in-kind support. Its distribution without public monitoring and the absence of objective criteria in determining the supported CSOs results in unequal provision of in-kind support under the political influence. In addition, throughout 2025 judicial interventions targeting municipalities run by the opposition party led to cuts in the logistical support—such as providing offices and meeting rooms—these municipalities provided to civil society.

Where support is available, it is most often provided locally and through institution-specific decisions rather than predictable public opportunities. In Bosnia and Herzegovina, municipal premises, youth spaces and logistical assistance continued to be made available to associations, including through rent-free or symbolically priced arrangements. Access,

[71] Law on Public Property of Serbia. https://www.paragraf.rs/propisi/zakon_o_javnoj_svojini.html

however, depended strongly on local political will, available property and the perceived status of the requesting organisation, with critical organisations in some locations reporting less favourable treatment.

Kosovo displayed a similar pattern. Although institutions and municipalities are authorised to provide public property and other resources, only 16.2% of surveyed CSOs received non-financial support in 2025, representing a decline from the two preceding years. Support was considerably more likely to be obtained through direct contact with institutions than through open calls, indicating that formal availability does not necessarily translate into equal access through transparent and competitive procedures.

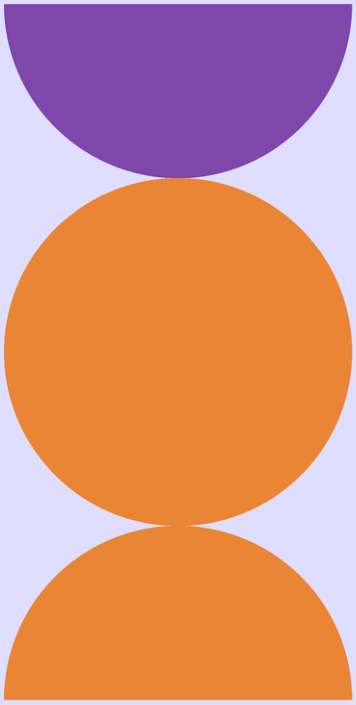
North Macedonia illustrates a broader structural problem. Although legislation allows public property to be allocated to CSOs, there are no standardised and transparent criteria for doing so and no comprehensive central register showing what state property is available. CSOs' repeated proposal to establish a permanent "Civil Society House" using state-owned premises was not taken forward in 2025, further illustrating the absence of a strategic approach to civic infrastructure.[72] Non-financial support was thus treated as an occasional concession rather than as part of a broader policy for civil society development.

Albania offers a notable positive example through the social reuse of confiscated assets. Following a public call in 2025, two NPOs were granted the use of confiscated properties to establish a cultural and community space and a centre providing reintegration services to vulnerable groups. [73] Nevertheless, the wider framework remains fragmented, with different forms of support deriving from sector-specific legislation and institutional practices rather than from a single set of transparent and objective criteria.

What emerges is not a functioning system of non-financial support, but a collection of **isolated legal possibilities and local practices**. Access is limited, inconsistent and frequently dependent on direct institutional contact, while strategic proposals for stable civic infrastructure remain unanswered. Without clear allocation procedures, public information on available resources and equal access through transparent mechanisms, non-financial support cannot develop into a reliable instrument for strengthening CSO sustainability.

[72] Government of North Macedonia, Department for Cooperation with NGOs, Proposals from the Civil Sector: Opening a Civil Society House. https://portal.nvosorabotka.gov.mk/post-body-files/predlozi-od-gragjanski-sektor-file-DNr1.pdf
[73] Agency for the Administration of Seized and Confiscated Assets, Annual Report 2025, p. 29. https://aapsk.gov.al/wp-content/uploads/2026/02/Raporti-2025-Final.pdf

2.3 Human Capital



2.3.1. Employment in CSOs

The defining employment development for civil society in 2025 was the disruption caused by the reduction and suspension of major international funding streams. Its effects were not documented equally across all countries, and the absence of comparable employment data prevents a precise regional calculation of jobs lost or created. Where evidence is available, however, it shows that sudden changes in donor funding translated directly into **staffing reductions, shorter contracts and the loss of specialised personnel**. This development should nevertheless be understood against a broader regional picture in which CSOs are generally treated equally under labour legislation, but access to employment incentives and reliable sector-specific employment data remains uneven.

The impact was particularly severe in North Macedonia, where the sharp reduction in USAID funding from the beginning of 2025 destabilised organisations implementing multi-year programmes in democratic governance, anti-corruption and youth engagement. An analytical assessment conducted by MCIC documented widespread layoffs, non-renewal of expert contracts and a significant reduction in employment as organisations lacked the reserves needed to maintain their payrolls.[74]

Interviews in Albania revealed a similar, although less extensively quantified, response to the temporary suspension of United States foreign assistance and shifting priorities among other donors, with some CSOs, particularly social service providers, reducing staff or shortened employment. The available evidence therefore demonstrates an employment shock in parts of the region, rather than a region-wide contraction that can be quantified consistently.

Montenegro stands out against this contraction. The number of people employed by CSOs reached 1,856 in 2025, an increase of 17% compared with the 1,590 employees recorded in 2023. The increase indicates employment growth over the two-year period, but cannot be interpreted as evidence of a 2025 counter-trend because comparable data for 2024 are unavailable.

Bosnia and Herzegovina also improved the precision of its employment data, recording 6,456 employees in associations and foundations in the Federation. However, a verified aggregate figure for the country as a whole remains unavailable: data for Republika Srpska are based on estimates and no comparable figure was obtained for Brčko District. The absence of regularly verified and comparable statistics for the country as a whole still prevents a reliable assessment of sectoral employment trends. Similarly, in Türkiye, the only publicly available data as of 2025 covers foundation employees (23,203), with no figures for associations. Regular and comparable statistics on employment in the non-profit sector are not consistently available across the six countries. This limits not only

[74] MCIC, The Impact of the Termination of USAID Financial Support on Macedonian Civil Society, April 2025. https://mcms.mk/images/docs/2025/Vlijanieto_od_prekinot_na_finansiskata_poddrshkata_na_USAID_vrz_makedonskoto_gragjansko_opshtestvo.pdf

comparison between countries but also governments' ability to design employment policies based on the actual structure of the sector.

Although there was a minimal increase in the number of employees at foundations compared to the previous year, Türkiye's economic conditions—which have been deteriorating for years—along with funding cuts and changes in donor policies have led to a significant reduction in the pool of paid staff at CSOs, particularly those working in the fields of humanitarian aid and refugee rights or watchdog organisations focus on gender equality, and human rights. Yet, the government has refrained from implementing any measures or incentives targeting the employment shortfall in the sector.

The **legal position of CSOs as employers** remained largely unchanged. Across most of the region, CSOs can employ staff under the same general labour rules as other employers, without additional registration requirements specific to the non-profit sector. Serbia, Albania, Kosovo and Montenegro formally apply the same general labour rules to CSOs as to other employers, without separate registration requirements or a distinct employment regime, while Bosnia and Herzegovina also broadly meets this formal standard. Formal equality, however, does not address the operational reality of organisations dependent on short-term and project-based funding.

In North Macedonia, general labour legislation applies to CSOs, but the sector remains excluded from certain state-backed employment benefits available to commercial entities. The sector is also unrepresented in national employers' unions, leaving uncertainty over the collective agreement applicable to CSO employees and limiting its representation in employment-policy discussions. A similar gap was visible in Bosnia and Herzegovina, where CSOs were not represented as non-profit employers in the working group preparing the new Labour Law in the Federation and had to advocate separately for inclusion in subsidy measures introduced in response to minimum-wage reform.

Employment-support programmes formally include CSOs in several countries, but their reach remains limited and cannot substitute for stable organisational funding. In Montenegro, 111 graduates were placed in CSOs through the state-funded Vocational Training Programme, although smaller organisations often lack the resources to retain interns after the nine-month placement. Albania also provides evidence of comparatively accessible employment support: 35 of 43 NPO applicants were approved for relevant schemes in 2025, and interviewed organisations did not report differential treatment compared with other employers. In Kosovo, by contrast, the proportion of surveyed CSOs benefiting from government employment programmes declined from 10.9% in 2023 to 7.4% in 2024 and 6.4% in 2025. These differences show that formal eligibility does not necessarily result in substantial or consistent use of employment incentives across the sector. The regional picture therefore combines generally equal treatment in labour law with weaker equality in access to employment support and a persistent lack of reliable sector-specific employment data. Two interconnected stories emerge from the available evidence: an employment shock linked to the disruption of international funding in parts of the region, and public employment policies that remain poorly adapted to the project-dependent nature of civil society work. Without regular employment data and policies

recognising CSOs as employers with distinct operational constraints, the full scale of the contraction documented in parts of the region—and its longer-term effect on civil society capacity—will remain only partially visible.

2.3.2. Volunteering in CSOs

Volunteering policy moved in two different directions in 2025. Several governments adopted new laws, strategies or support measures, signalling greater recognition of volunteering as a component of civil society development. At the same time, long-standing reforms remained stalled elsewhere, existing legal frameworks continued to create administrative burdens in several countries, and newly adopted frameworks had yet to produce visible changes in practice. Across the region, volunteering generally remained possible in practice, but legal frameworks and public policies did not consistently make it simple, protected and actively supported.

In Türkiye, as a result of the work carried out in 2024 under the UNDP-led project, public institutions continued to work on a draft law on volunteering in 2025. However, the final version of the draft has still not been shared with the CSOs involved in the public-CSO working group which had been working throughout 2024 for developing white paper that covers policy and legal recommendations on advancing volunteering.

The most substantial **legislative development** occurred in Albania, where Parliament adopted a new Law on Volunteering in December 2025.[75] The Law regulates both short- and long-term volunteering, establishes basic rights and protections, and creates a legal basis for subsidising costs related to volunteers, supervision and programme management. CSOs nevertheless raised concerns during the legislative process regarding volunteer-registration requirements, the sanctions regime and the need for a clearer distinction between volunteering and employment,[76] and not all recommendations were reflected in the adopted law. As it had not yet entered into force during the reporting period and required secondary legislation for implementation, no operational state-supported programme was available in 2025. Volunteering therefore continued independently of state support through organised and informal engagement.

Progress elsewhere was driven primarily by strategic and policy measures rather than comprehensive legislative reform. Republika Srpska adopted a Strategy for the Improvement and Development of Volunteering 2025–2031, [77] including responsible institutions and budgeted activities,[78] while additional policies and support measures were

[75] Law No. 94/2025 On Volunteering, Official Gazette 15/2026. http://qbz.gov.al/eli/ligj/2025/12/18/94
[76] Partners Albania, Comments and Recommendations on the Draft Law On Volunteerism, 17 November 2025. https://www.partnersalbania.org/News/comments-and-recommendations-on-the-draft-law-on-volunteering/
[77] Government of Republika Srpska, Decision on the Adoption of the Strategy for the Improvement and Development of Volunteering in Republika Srpska (2025–2031). Reported at: https://www.paragraf.ba/dnevne-vijesti/20122024/20122024-vijest1.html
[78] Action Plan 2025–2027. Reported at: https://www.paragraf.ba/dnevne-vijesti/14042025/14042025-vijest2.html

developed in Brčko District and Banja Luka. These measures strengthened the policy basis for volunteering in parts of Bosnia and Herzegovina, but support remained fragmented and was not harmonised or equally available across the country.

Montenegro adopted its **first dedicated Strategy for the Development of Volunteering** 2025–2029, focusing on institutional infrastructure and the broader promotion of volunteering. For the first time, the responsible ministry also issued a dedicated call supporting 13 CSO projects in this area. These were important practical developments, but they did not resolve weaknesses in the underlying Law on Voluntary Work. The Law continues to impose formal requirements for organised volunteering,[79] while 45% of surveyed CSOs considered administrative procedures for engaging volunteers complicated.

North Macedonia continued to operate under its existing volunteering framework, including provisions for tax-exempt reimbursement of volunteer-related expenses, but the long-planned reform of the Law on Volunteerism remained stalled. Amendments prepared through an earlier reform process had still not been adopted in 2025. Practice also pointed to continuing administrative obstacles: a substantial number of surveyed organisations described procedures for engaging volunteers as difficult, while some reported that volunteers had to be registered with a state institution.

Kosovo entered the first year of implementation[80] of updated the governing youth volunteering, strengthening protections related to non-discrimination, reimbursement of expenses, recognition of volunteering hours and other elements of organised youth volunteering,[81] but volunteers aged 30 and above remained outside a specific framework regulating their rights, responsibilities, insurance, liability and recognition of experience. Work on a long-discussed comprehensive Concept Document continued, but the draft had still not entered public consultation by the end of 2025. Serbia's legislation provides minimum protections and does not prevent spontaneous volunteering, but it does not explicitly regulate spontaneous practices and remains insufficiently aligned with standards for stimulating volunteering.[82] Recommendations developed through a working group established in 2020 had still not resulted in the required reform.

Practice reveals that the **burden created by existing rules** varies significantly. In Serbia, survey findings appear positive, with none of the surveyed organisations reporting registration requirements, high costs, administrative burdens or sanctions. However, qualitative findings suggest this partly reflects the limited use of volunteering due to an insufficiently regulated framework and the absence of a responsible body maintaining records. In Bosnia and Herzegovina, however, 16% of surveyed CSOs working with volunteers had to register them, while 26% considered the administrative procedures

[79] Law on Volunteer Work of Montenegro. https://www.zzzcg.me/wp-content/uploads/2015/05/Zakon-o-volonterskom-radu.pdf
[80] Law No. 08/L-264 on Youth. https://gzk.rks-gov.net/ActDetail.aspx?ActID=95847
[81] Administrative Instruction (MCYS) No. 08/2024 on Youth Volunteering. https://gzk.rks-gov.net/ActDetail.aspx?ActID=100109
[82] Law on Volunteering of Serbia. https://www.paragraf.rs/propisi/zakon_o_volontiranju.html

complicated. Only 2% reported sanctions for engaging unregistered volunteers, but interviews pointed to wider difficulties. Requirements in Republika Srpska favour institutionally supported rather than project-based volunteering, limiting organisational flexibility, while visa and residence requirements complicate the engagement of foreign volunteers. Administrative burdens were also evident in Montenegro and North Macedonia, where sizeable shares of surveyed organisations reported complicated procedures and some organisations were required to register volunteers. Across these countries, severe sanctions were uncommon, indicating that the main practical problem is administrative complexity rather than outright prohibition of volunteering.

Limited awareness and weak access to state support remain equally important obstacles. Montenegro provided the clearest positive development in 2025 through its first dedicated public call for volunteering projects. In Kosovo, 75.3% of surveyed CSOs were unaware of any state programme supporting volunteer engagement. The proportion assessing the legal and policy framework as stimulating or somewhat stimulating fell from 57.4% in 2024 to 44.4% in 2025. The updated youth-volunteering rules therefore produced little visible change in the support experienced by CSOs during their first year of implementation. Albania's new framework likewise could not yet be assessed in practice because its support mechanisms were not operational during the reporting period. In Serbia, planned measures had not yet translated into identifiable support programmes during 2025.

The year brought **more policy activity than practical transformation**. New laws, strategies and the first dedicated funding initiatives created openings for stronger volunteering systems, particularly in Albania, Montenegro and parts of Bosnia and Herzegovina. Yet incomplete coverage, delayed implementation, stalled reforms and low awareness continue to leave volunteering dependent primarily on the initiative and resources of CSOs themselves. The principal regional weakness is therefore not that CSOs are generally prevented from engaging volunteers, but that volunteering is still insufficiently supported by simple procedures, comprehensive protections and functioning public incentives.

2.3.3. Civic engagement and education

Civic education is present in policies and curricula throughout the region, but the connection between learning about citizenship and practising it remains strikingly weak. Educational systems introduce pupils and students to democratic values, social responsibility and participation to varying degrees, yet rarely provide structured pathways through which they can apply this knowledge by volunteering, undertaking internships or participating in community activities with CSOs. The main regional gap against the standard is therefore not the complete absence of civic education, but the weak integration of practical engagement with civil society into the educational system.

Formal inclusion in the curriculum does not necessarily guarantee consistent or democratically grounded civic education. In North Macedonia, independent monitoring has identified outdated, exclusionary and discriminatory content in state-approved

textbooks, while interventions promoting "national identity" and increasing state control over textbook publishing [83] have raised similar concerns in Serbia. In Bosnia and Herzegovina, the principal challenge is the fragmentation of education across jurisdictions, which results in civic engagement being promoted unevenly despite its recognition in the newly adopted Strategy for Creating an Enabling Environment for Civil Society Development. Curricula also moved in opposite directions: Central Bosnia Canton adopted a cross-curricular civic education curriculum, while Republika Srpska removed "Democracy and Human Rights" as a standalone subject, integrating its outcomes into other subjects. The challenge is therefore not simply whether civic education exists, but what values it conveys and whether pupils receive comparable opportunities to develop democratic knowledge and skills.

Recognition of CSOs as providers of non-formal education is more developed than their integration into formal learning. Montenegro's legislation and adult-education policies[84] acknowledge the role of CSOs in education for civic democracy, gender equality, environmental protection, sustainable development and media literacy. This provides a basis for civil society participation in non-formal education but does not demonstrate that schools and universities systematically connect pupils and students with CSOs. The distinction is important: access to adult training and project-based educational activities cannot substitute for civic engagement embedded throughout formal education.

In practice, cooperation between educational institutions and CSOs remains largely dependent on individual initiatives. Albania reported partnerships enabling students to participate in civic, social and community activities, but these were predominantly project-based, while lengthy approval procedures limited their accessibility and regularity. In Türkiye, access of CSOs to schools is tightly restricted by Ministry approvals and protocol requirements, resulting in civic education partnerships remaining strictly limited, highly bureaucratic, and dependent on state vetting. A similar barrier emerged in Bosnia and Herzegovina, where organisations reported newly needing approval from ministries or pedagogical institutes to work with schools, while school-based civic engagement continues largely through CSO-led programmes such as CIVITAS' "Project Citizen". In Serbia, some faculties provide opportunities for professional practice in CSOs, but each institution decides independently whether to offer them. Many organisations also provide volunteering opportunities to pupils, yet these are not necessarily coordinated with schools. North Macedonia presents an even clearer disconnect, as internships, fellowships and structured volunteering with CSOs remain entirely absent from curricula at all levels of education.

CSO-led initiatives in Kosovo demonstrate both the potential and the limitations of this model. Organisations worked with schools on solidarity, human rights, gender equality, violence prevention and civic participation, creating opportunities for pupils to translate

[83] Civic Initiatives, Zakon o udžbenicima cementira političku kontrolu nad obrazovanjem, 22 July 2025. https://www.gradjanske.org/zakon-o-udzbenicima-cementira-politicku-kontrolu-nad-obrazovanjem/
[84] Law on Education of Adults of Montenegro. https://www.gov.me/dokumenta/439c7ed8-b8b6-4c79-9cbc-1988c42551e4

civic learning into collective action. Nevertheless, the youth-policy framework, school curriculum and CSO-led activities remained loosely connected, with no system enabling pupils and students to move regularly from civic education into volunteering, community work or civil society engagement. Positive individual initiatives therefore continued to compensate for, rather than form part of, a structured educational pathway.

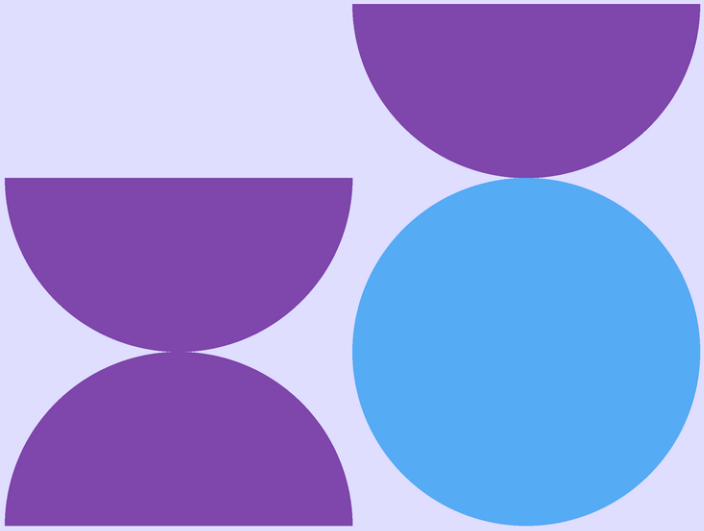
Reliance on institutional discretion can also determine which forms of civic education are permitted. In Kosovo, an LGBTI organisation reported difficulties accessing secondary schools across several municipalities, including a case in which a school principal threatened to penalise participating pupils. A women's rights organisation reported that it was permitted to conduct research on gender norms only on the condition that its findings would not be published.[85] These reported experiences show that cooperation may be available for broadly accepted community activities while becoming restricted when civic education addresses gender equality, minority rights or other issues challenging dominant social norms.

Educational systems therefore teach civic engagement more readily than they enable it. CSOs continue to fill the gap through projects, volunteering opportunities and community initiatives, but access remains irregular, dependent on individual institutions and vulnerable to administrative or ideological restrictions. Turning civic education into active citizenship requires more than curriculum content: it requires structured and inclusive partnerships through which pupils and students can engage with civil society as a regular part of their education.

[85] Kosovar Civil Society Foundation, Research in Focus: Monitoring the Enabling Environment for Organisations Working on Gender Equality and Women's Rights (draft, 2025; interviews with CSO representatives).

Area 3: State-CSO Relationship

3.1 Frameworks and Practices for Cooperation



3.1.1. State Policies and Strategies for Development of and Cooperation with Civil Society

The regional strategic landscape changed visibly in 2025, but not necessarily decisively. Bosnia and Herzegovina and North Macedonia adopted new strategies for cooperation with civil society, Serbia adopted a new action plan under its existing strategy, and Montenegro continued implementing its current strategic framework. At the same time, Albania and Kosovo entered another year without an operative document specifically setting out current objectives, responsibilities and commitments for civil society development. These different positions nevertheless lead to a common conclusion: the adoption or continued existence of a strategic document remains a poor measure of the priority governments assign to civil society unless it is accompanied by implementation, funding, monitoring and sustained institutional ownership. Across the region, a recurring weakness is the limited availability and use of reliable sector data to inform strategic planning and assess results.

The clearest formal progress was recorded in Bosnia and Herzegovina, where the Council of Ministers adopted the country's first state-level Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029,[86] together with an Action Plan for 2025–2026. [87] The Strategy complements the existing Agreement on Cooperation between the Council of Ministers and NGOs and, for the first time, provides a strategic framework at state level. North Macedonia similarly adopted a new Strategy for Cooperation with and Development of Civil Society[88] and an accompanying Action Plan for 2025–2028.[89] The document addresses the legal, institutional and financial environment for CSOs, public funding, volunteering, civic engagement and access to domestic and international resources. Yet it represents more of a continuation than a new strategic direction, repeating many measures from the 2022–2024 Action Plan that had not been fully implemented. [90] Long-awaited improvements to public funding, including clearer responsibilities for the competent ministries and the formalisation and operationalisation of public co-financing for CSOs seeking IPA funds, remained unrealised despite continued efforts by civil society to advance these reforms. Its adoption therefore renews the

[86] Council of Ministers of BiH, Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029. https://mpr.gov.ba/en/strategy-of-the-council-of-ministers-of-bih-for-creating-an-enabling-environment-for-the-development-of-civil-society-2025-2029
[87] Council of Ministers of BiH, press release on the adoption of the Strategy. https://vijeceministara.gov.ba/en/portal/post/council-of-ministers-of-bosnia-and-herzegovina-holds-its-84th-session-638875643520000000
[88] Government of North Macedonia, Strategy for Cooperation with and Development of Civil Society 2025–2028. https://portal.nvosorabotka.gov.mk/post-body-files/strategii-po-godini-file-j75B.pdf
[89] Action Plan 2025–2028. https://portal.nvosorabotka.gov.mk/post-body-files/strategii-po-godini-file-YyeA.xlsx
[90] MCIC and Civil Society Resource Centre, Report on the Implementation of Activities under the Action Plan, March 2025. https://rcgo.mk/wp-content/uploads/2025/05/14-1-izvestaj-za-sproveduvanje-na-strategija-za-sorabotka.pdf

Government's formal commitments without resolving the implementation deficit inherited from the previous cycle.

Participation in developing the new frameworks took different forms and did not always extend to early-stage co-creation. In Bosnia and Herzegovina, CSOs participated through a one-month online consultation and meetings held in four cities, reportedly involving a substantial number of organisations. However, wider civil society was not directly represented in the working group responsible for drafting the Strategy, with participation channelled instead through the Advisory Body for Cooperation with NGOs. In North Macedonia, the Civil Society Resource Center supported the development process,[91] while the draft was discussed and approved by the Council for Cooperation with Civil Society before its adoption. It was also published on ENER, [92] although no comments were submitted through the platform. These examples demonstrate that consultation opportunities were provided, but also that the existence of a public consultation cannot by itself establish whether the sector shaped the priorities from the earliest stages or whether participation was sufficiently broad.

The absence of an operative strategy was most evident in Albania, Kosovo and Türkiye. Albania's second Roadmap expired in 2023 with a low level of achievement, and by the end of 2025 no successor had been adopted. Measures relevant to civil society remain included in the broader Roadmap for the Functioning of Democratic Institutions, but implementation remains weak and does not yet amount to a comprehensive strategic approach to civil society development. Interviews indicate that cooperation continues to be concentrated in consultation phases rather than early policy design and is sometimes experienced as formalistic, selective and only partially reflected in final decisions.

Kosovo spent a second consecutive year without an operative national strategy following the expiry of the 2019–2023 framework. Unlike Albania, however, preparation of the successor was active throughout 2025: ten CSOs participated in the inter-institutional working group, consultations were held in five locations across Kosovo, and the draft entered preliminary consultation with public institutions in November.[93] The proposed framework included objectives, responsibilities, indicators and planned financing, but remained unadopted at year-end. The weak implementation record of the previous Strategy — only 17 of 48 activities were fully implemented by the end of 2023 [94] — underscores that adoption alone will not resolve the implementation gap.

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[91] Civil Society Resource Centre, Consultations conducted on the Government's draft Strategy, 16 June 2025. https://rcgo.mk/vesti/sprovedeni-konsultacii-za-predlog-strategijata-na-vladata-za-sorabotka-so-i-razvoj-na-graganskoto-opshtestvo-i-akciskiot-plan-2025-2028/

[92] ENER. https://ener.gov.mk/Default.aspx?item=newdocumentdetails&detalisId=84

[93] Draft Government Strategy for Cooperation with Civil Society 2026–2031. https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=42961

[94] Office of the Prime Minister of Kosovo, Evaluation Report on the Implementation of the Government Strategy for Cooperation with Civil Society 2019–2023, February 2024. https://kryeministri.rks-gov.net/wp-content/uploads/2024/03/Raporti-i-vleresimit-te-Strategjise-2024.pdf

While Türkiye's 12th Development Plan[95] emphasizes the importance of CSOs actively participating in policy- and decision-making processes, strengthening their capacities, and enhancing cooperation among public institutions, the private sector, and CSOs, it lacks sufficiently concrete steps and an operational strategy document or an action plan for implementing these objectives. The Directorate General for Relations with Civil Society published a Draft Civil Society Strategy Document and Action Plan 2023–2027 on its website in August 2022, inviting feedback from CSOs, relevant experts, academics, and the general public – however, as of the end of 2025, this policy document had not entered into force.

Where strategies and action plans remained formally operational, implementation continued to expose their limitations. Montenegro's Strategy 2022–2026 and its budgeted Action Plan [96] contain defined objectives, activities, responsible authorities and implementation deadlines. Reported implementation improved in 2025, with 60% of activities completed, 13% partially completed and 27% not completed. This represents visible progress compared with earlier years, particularly 2023, when 59% of activities were not completed. Nevertheless, more than one-quarter of the planned activities remained unrealised, showing that even the region's more structured and regularly reported framework has not yet secured full institutional delivery.

Serbia demonstrates the sharpest rupture between the continued production of strategic documents and the political conditions required for cooperation. The Government adopted an Action Plan for 2025–2026 under the Strategy for Creating an Enabling Environment for the Development of Civil Society 2022–2030. The Action Plan itself acknowledged[97] that only five of the 17 measures from the previous cycle had been fully implemented and that the Strategy's specific objectives had not been fully achieved. Ten days after its adoption, CSO representatives froze their membership in the Council for Cooperation in response to sustained pressure and repression against civil society.[98] No CSOs were subsequently involved in monitoring and evaluating the Strategy during 2025 or in preparing the implementation report for 2022–2024. Under these conditions, the Action Plan remained formally valid while the cooperative relationship on which its implementation depends had effectively broken down.

The experience of 2025 shows that strategic continuity can conceal very different realities. Bosnia and Herzegovina created a long-awaited state-level framework, North Macedonia renewed commitments left unfinished under the previous cycle, Montenegro demonstrated measurable but incomplete implementation, and Kosovo conducted a

[95] Presidency of Strategy and Budget, Twelfth Development Plan (2024–2028). https://www.sbb.gov.tr/?p=60946
[96] Strategy for Cooperation between State Authorities and NGOs 2022–2026. https://wapi.gov.me/download-preview/cc6fef07-782f-4b78-8b15-fa851ccc3abf?version=1.0
[97] Action Plan for 2025–2026 for the implementation of the Strategy for Creating an Enabling Environment for the Development of Civil Society 2022–2030, Official Gazette of RS 6/2025. http://demo.paragraf.rs/demo/combined/Old/t/t2025_01/SG_006_2025_003.htm
[98] Civic Initiatives, Members of the Council freeze membership, 26 January 2025. https://www.gradjanske.org/clanovi-i-clanice-saveta-za-stvaranje-podsticajnog-okruzenja-za-razvoj-civilnog-drustva-zamrzavaju-clanstvo-zbog-ugrozavanja-rada-ocd/

participatory drafting process without completing adoption. Albania remained without a dedicated successor to an under implemented Roadmap, while Serbia preserved its strategic architecture after the CSO representatives in its principal cooperation mechanism froze their participation. The decisive question is therefore no longer whether governments possess strategies for cooperation, but whether those strategies carry sufficient political ownership to survive beyond their adoption. Where previous measures are repeatedly transferred into new plans, implementation reports remain incomplete, or CSOs withdraw from monitoring because cooperation itself has become untenable, the strategy risks documenting commitments that state practice is simultaneously undermining.

3.1.2. Institutions and Mechanisms for Development of and Cooperation with Civil Society

Institutional cooperation in 2025 was defined by two opposing developments. North Macedonia and Montenegro re-established councils that had been inactive for several years, reopening formal channels for dialogue between governments and civil society. Elsewhere, however, principal cooperation mechanisms remained inactive, weakly influential or largely ceremonial. Kosovo's Council did not meet, Bosnia and Herzegovina's Advisory Body operated without confirmed membership for a significant part of the year, Albania's Council exercised little visible influence, Serbia's CSO representatives froze their participation in response to the wider deterioration of civic space, and Türkiye still lack of meaningful cooperation mechanisms. The region therefore did not lack cooperation mechanisms in formal terms; it lacked mechanisms consistently capable of carrying civil society positions into government decisions. Resources and institutional leverage were an additional weakness in several countries, limiting the ability of formally established bodies to translate recommendations into government action.

North Macedonia and Montenegro both restored cooperation councils that had previously been inactive, but their development during 2025 differed considerably. North Macedonia's newly constituted Council began its mandate in April, held seven regular sessions,[99] adopted its Work Programme for 2025–2026[100] and provided input on the new Strategy for Cooperation with and Development of Civil Society. Although limited competition during the selection process[101] and the absence of candidates representing marginalised groups raised questions about the breadth and diversity of participation, the

[99] Report on the work of the Council for Cooperation for 2025. https://portal.nvosorabotka.gov.mk/post-body-files/9-ta-sednica-na-sovetot-za-sorabotka-megju-vladata-i-gragjanskoto-opstestvo-file-tPci.pdf
[100] Council Work Programme 2025–2026. https://portal.nvosorabotka.gov.mk/post-body-files/dokumenti-file-vvy1.pdf
[101] Government of North Macedonia, List of candidates for members of the Council for Cooperation. https://portal.nvosorabotka.gov.mk/post-body-files/lista-na-kandidati-spored-brojot-na-dobieni-glasovi-za-clenovi-i-zamenici-clenovi-na-sovetot-za-sorabotka-megju-vladata-i-gragjanskoto-opstestvo-file-ePSG.pdf

Council nevertheless moved beyond formal re-establishment and resumed substantive work on policies affecting the sector.

Montenegro's Council was reconstituted with equal representation from institutions and civil society, but held its first meeting only in December, leaving insufficient practice to assess its influence. Survey findings also revealed limited sectoral engagement in Montenegro: fewer than half of responding CSOs were aware of its work, while only around one-fifth considered the selection of NGO representatives transparent. The two cases demonstrate that institutional reactivation is a necessary improvement, but does not by itself ensure representative participation, sectoral confidence or meaningful influence over government decisions.

The opposite pattern was visible in Kosovo and Bosnia and Herzegovina, where designated institutions remained in place, but the principal joint mechanisms were not operational. Kosovo's Office for Good Governance continued to serve as the government focal point and cooperated with CSOs during preparation of the successor Strategy. However, the Council for Government Cooperation with Civil Society did not meet at all in 2025 because the mandates of its members had expired and a new composition was not appointed.[102] Civil society consequently had no functioning permanent forum through which it could raise sector-wide concerns. This was particularly significant because the Council's existing framework provided civil society with majority representation and required CSO initiatives to be considered; these participatory safeguards could not operate while the body remained inactive.

In Bosnia and Herzegovina, responsibility for cooperation remained with the Ministry of Justice and its Sector for Legal Aid and Civil Society Development, which continued to operate with limited human resources relative to the scale of its mandate. The Advisory Body of the Council of Ministers for Cooperation with NGOs existed formally but was not fully operational. After the Council of Ministers failed to appoint new members in June, the public call had to be republished in September, leaving the principal state-level consultation mechanism without confirmed membership for a substantial part of the year. The combination of an under-resourced coordinating unit and an incompletely constituted advisory mechanism substantially limited the institutional capacity for regular government–CSO dialogue.

Survey evidence also points to limited confidence in the influence of these mechanisms. In Bosnia and Herzegovina, 67% of responding CSOs were aware that the Advisory Body existed, but only 23% believed its decisions were based on CSO recommendations. Similarly, in North Macedonia, awareness of the reactivated Council was stronger than confidence that its decisions reflected civil society contributions. These findings suggest

[102] ECORYS Consortium, Support to the Implementation of Kosovo's Government Strategy for Civil Society: Draft Inception Report, 19 February 2026 (unpublished).

that visibility of a mechanism does not necessarily translate into perceived influence over its decisions.

Albania's National Council for Civil Society remained the main formal channel for dialogue between the Government and NPOs,[103] but its practical relevance continued to fall short of its statutory mandate. The Council provided an institutional space in which CSO representatives could contribute views and formulate recommendations. Yet low activity, weak follow-up, limited continuity and insufficient consolidation of civil society positions meant that it exercised little visible influence over public policy or decision-making in 2025. Its continued operation therefore demonstrates institutional continuity, but not an effective mechanism capable of articulating and advancing sector-wide priorities.

Serbia presents a more fundamental breakdown. CSO representatives froze their membership in the Council for Creating an Enabling Environment for the Development of Civil Society in January 2025 because of incidents demonstrating the continued deterioration of civil society's position. In September, they submitted a proposal to the Government and the responsible ministry[104] outlining a possible way out of the crisis, but received no response during the year. As a result, there were no activities related to monitoring or implementing the Strategy.

In a separate development in February 2025, 29 organisations announced that they were suspending cooperation with the legislative and executive authorities, arguing that government conduct increasingly departed from democratic standards and the rule of law.[105] Survey and focus-group evidence described cooperation as pro forma and lacking any genuine intention to consider civil society expertise. In this context, inactivity was not caused simply by expired mandates, administrative delay or insufficient resources, but by the collapse of the minimum trust required for cooperation to continue.

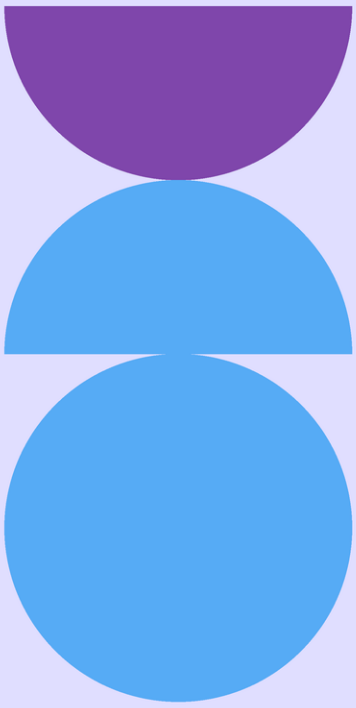
Türkiye has not yet established an institution or effective mechanisms for development of and cooperation with civil society at the national level. The Civil Society Advisory Board operating under the Directorate General of Relations with Civil Society is far from functioning as a regular, effective, and inclusive mechanism. The board does not meet regularly; its meetings and their outcomes are not publicly announced; and its members are appointed by the Minister of the Interior and are not disclosed to the public. The Civil Society Advisory Board does not adequately represent the diversity of civil society and fails to fulfil the necessary missions of consultation and collaboration required for the civil society development. Additionally, at local level, the judicial proceedings targeting

[103] Law No. 119/2015 On the Establishment and Functioning of the National Council for Civil Society. https://qbz.gov.al/alfresco/webdav/FZ/2015/200/fz-2015-200.pdf
[104] Center for Democracy Foundation, Open letter of the CSO members of the Council, 4 September 2025. https://centaronline.org/otvoreno-pismo-clanova-saveta-za-stvaranje-podsticajnog-okruzenja-za-razvoj-civilnog-drustva-iz-redova-ocd/
[105] Mašina, Obustava saradnje 29 organizacija civilnog društva sa zakonodavnom i izvršnom vlašću u Srbiji, 6 February 2025. https://www.masina.rs/obustava-saradnje-29-organizacija-civilnog-drustva-sa-zakonodavnom-i-izvrsnom-vlascu-u-srbiji/

municipalities run by the opposition party have increasingly restricted the conditions under which civil society can collaborate with these municipalities.

Taken together, the developments of 2025 underline that the existence or reactivation of formal cooperation mechanisms is only a starting point. Their effectiveness depends on continuity, representative participation, institutional responsiveness and, critically, sufficient trust for civil society to engage with them. Across the region, weaknesses in one or more of these elements continued to limit the ability of cooperation mechanisms to translate civil society input into government decisions. The key challenge therefore remains not simply maintaining formal structures, but ensuring that they provide credible and functioning channels through which civil society can influence policy and decision-making.

3.2 Involvement in Policy- and Decision-Making Process



3.2.1. Standards for CSO Involvement

The legal foundations for civil society participation in policymaking are broadly established across the region, but remain considerably stronger than their implementation. Laws, government rules and consultation regulations across the region generally require draft acts to be published, establish minimum consultation periods and provide opportunities for CSOs and other interested parties to submit comments. Some frameworks also envisage early involvement, participation in working groups and institutional reporting on consultation outcomes. Yet the central weakness recorded in 2025 was not the absence of consultation rules. It was the ease with which institutions could postpone participation until the essential policy choices had already been made, shorten or bypass procedures, selectively invite organisations and proceed without demonstrating how civil society contributions affected the final decision.

The applicable **consultation periods** vary, but generally provide a formal basis for meaningful participation, from 15 working days[106] in Kosovo and Türkiye to 30 days in North Macedonia, although the exact rules and stages covered differ between systems. Montenegro regulates both the participation of CSO representatives in public debates during the preparation of laws and strategies, while Bosnia and Herzegovina maintains consultation standards at different administrative levels. Serbia's Rules of Procedure prescribe public hearings for systemic laws, previously unregulated areas and substantial legislative amendments. Some formal guarantees nevertheless weakened during the year: at the end of 2025, Serbia broadened the Government's discretion to decide that a public hearing would not be held, while Montenegro's framework continues to exclude the defence sector and state budget.[107] In Albania, formal consultation standards[108] require public authorities to publish draft acts, review stakeholder input and provide reasons for rejecting recommendations, supporting CSO participation in policymaking. Formal guarantees are therefore relatively well established, although their scope and implementation vary considerably.

Institutional capacity to implement the rules remains uneven and insufficiently embedded in public administration. Requirements for designated officials and training vary considerably: Bosnia and Herzegovina requires responsible consultation persons at state level and Kosovo retains designated consultation coordinators, while Montenegro, Türkiye and Serbia lack comprehensive requirements for dedicated units or officers across institutions. Training exists to varying degrees, but available evidence points to uneven capacity to facilitate meaningful CSO involvement. In Bosnia and Herzegovina, procedural training on the **eKonsultacije** platform is offered to civil servants, but training for CSOs on consultation processes has not been held since 2017–2018. The regional framework is thus

[106] Regulation (GRK) No. 05/2016 on Minimum Standards for the Public Consultation Process. https://gzk.rks-gov.net/ActDetail.aspx?ActID=15036
[107] Regulation on the election of NGO representatives to working bodies and the conduct of public debates, Official Gazette of Montenegro 41/18. https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04
[108] Law No. 146/2014 On Notification and Public Consultation. https://financa.gov.al/wp-content/uploads/2024/09/ligj-1462014.pdf

considerably stronger in prescribing that consultation should happen than in ensuring that each institution has trained personnel clearly responsible for making it work.

In practice, the gap between formal consultation opportunities and **timely and adequately informed involvement** remained pronounced. Across the region, CSOs continued to be involved more reliably once draft texts or policy directions had already been developed than at the stage when fundamental choices were still open. Even where consultations took place, insufficient preparation time, incomplete documentation and failure to use mandatory procedures reduced their practical value. The scale of the problem varied. In Bosnia and Herzegovina, 68% of surveyed CSOs that had participated in consultations reported early-stage involvement, although interviews described consultations as frequently beginning only after drafts were prepared and cooperation as formal rather than genuinely influential. In Kosovo, fewer than half of participating organisations reported involvement at the initial stage. Although around 86% of monitored written consultations respected the minimum 15-working-day-period, only 34.1% of participating survey respondents considered that they had sufficient time to prepare comments, a percentage similar to Montenegro (32%), although only 25% Montenegrin CSOs reported early involvement. The continued use of urgent procedures in Bosnia and Herzegovina and Albania similarly limited opportunities for timely participation.

Concerns also extended beyond timing to **who is able to participate**. Formal openness did not always translate into transparent or non-discriminatory access to working groups and other forms of direct involvement. In Albania, CSOs participate in EU-integration consultation structures,[109] although practices for recording discussions, following up on recommendations and demonstrating how input informs decisions remain uneven. Kosovo CSOs likewise reported that access to working groups often depended on previously established relationships with institutions, while qualitative research found less consistent access for organisations representing marginalised communities, including those working on LGBTI rights, facing particular difficulties in some cases. Serbia represented the most serious manifestation of this problem. Independent experts and CSOs were excluded from significant legislative processes, while working groups on media legislation included GONGOs instead of relevant independent journalistic organisations[110] and other processes were affected by politically connected or phantom organisations. While the legislation in Türkiye grants discretion of the relevant public administration whether CSOs will be effectively involved, public institutions mostly tend to bypass the procedures or selectively invite organisations. Thus, CSO participation in decision-making remains rare, largely one-sided and is not guaranteed independently of CSOs' political orientations. These cases demonstrate that consultation can be formally open while access to the stages with the greatest potential for influence remains selective.

[109] Prime Minister's Order No. 113/2019 on the Partnership Platform for European Integration. https://www.kryeministria.al/platforma-e-partneritetit-per-integrimin-evropian/
[110] National Convention on the European Union, Working group for amending media laws and the new Media Strategy, 28 November 2025. https://eukonvent.org/radna-grupa-za-izmenu-medijskih-zakona-i-novu-medijsku-strategiju-zatvoren-proces-bez-garancija-integriteta-i-stvarnih-reformi/

The weakest part of the regional consultation cycle remains **what happens after contributions are submitted**. Available findings provide little evidence of systematic public feedback explaining why recommendations were accepted or rejected, while perceptions that CSO input affected final decisions remain low. In Bosnia and Herzegovina, for example, only 16% of participating CSOs reported that their contributions were fully taken into account, while 13% received no information on what happened to their proposals. In Kosovo, 81% of surveyed organisations that had comments fully or partially rejected reported receiving no written explanation, and similar weaknesses in publishing consultation results and explaining decisions were recorded in Albania. The use of CSO research and evidence in policy documents, impact assessments and final legislative proposals is even less visible. This absence of a clear feedback loop transforms participation into a one-way process: institutions request contributions but assume limited responsibility for demonstrating how those contributions informed the result.

Digital consultation platforms, available in all countries, have expanded access in principle, but their practical effectiveness has also been undermined by inconsistent use, fragmented systems and technical interruptions, including significant outages of Kosovo's central platform during 2025. Republika Srpska launched its own eKonsultacije portal in 2025, while the Federation of Bosnia and Herzegovina and Brčko District still lack a unified consultation platform. In North Macedonia, the increasing number of laws initiated by Members of Parliament, combined with the persistently low level of institutional responses to comments submitted through ENER,[111] further reduced the reach and practical value of the established consultation system.

The number of meetings, published drafts or participating organisations cannot therefore serve as the principal measure of meaningful involvement. In 2025, consultation opportunities were available across the region, and some organisations were involved early and provided with adequate documentation. Yet late invitations, expedited procedures, inconsistent use of consultation platforms, weak administrative capacity, selective access and limited institutional responses continued to separate formal participation from influence. In the most serious cases, particularly in Serbia, selective participation and the inclusion of government-aligned organisations risked turning formal consultation into a means of legitimising decisions rather than enabling independent civil society influence.

3.2.2. Public Access to Draft Policies and Laws

The legal right to access draft regulations and public information is well established throughout the region. Public institutions are generally required to publish draft and adopted legislation, while freedom-of-information laws prescribe procedures, deadlines, appeal mechanisms and sanctions for non-compliance. Some positive legal developments

[111] MCIC and Civil Society Resource Centre, Government Mirror: Annual Report from Monitoring ENER 2025. https://rcgo.mk/wp-content/uploads/2026/07/government-mirror-2025-csrc.pdf

were recorded in 2025. Brčko District adopted a new Law on Freedom of Access to Information, filling an important gap in Bosnia and Herzegovina's fragmented framework[112], while Albania adopted new transparency-programme models for public authorities[113] and local government.[114] Their practical effects could not yet be assessed, however, as Albania's models were not due to be implemented until March 2026, while the effectiveness of the Brčko District framework will depend on the interpretation of its exceptions and the accessibility of its remedies. In several countries, including Serbia, the underlying legal framework for publication, access to information, appeals and sanctions remains relatively comprehensive; the more persistent weakness lies in implementation.

The more serious limitation was not whether draft policies and laws eventually became publicly available, but whether they were accessible early enough, through predictable and functioning channels, to support meaningful public scrutiny and participation. Digital consultation platforms and institutional websites provide established channels for accessing drafts across the region, but their existence did not ensure consistent access. Fragmented systems, irregular publication practices, technical interruptions and the need to monitor several institutional sources continued to reduce their practical value.

In North Macedonia, only 25 of the 67 government and ministerial draft laws legally required to undergo regulatory impact assessment and prior publication appeared on ENER before being submitted to Parliament – recording the clearest compliance gap.[115] In Bosnia and Herzegovina, the Reform Agenda under the EU Growth Plan became publicly available only after the European Commission published it in December 2025, when the opportunity for early domestic participation had already passed. Kosovo's central consultation platform was unavailable for two extended periods, forcing institutions to publish several drafts on their own websites and requiring CSOs to monitor multiple sources. Participation through the platform also fell to its lowest level since its launch in 2017. In Türkiye, while parliamentary draft laws are generally accessible, secondary legislation—such as bylaws and directives—is rarely published or opened for consultation, limiting transparency. These examples illustrate a broader distinction between the eventual availability of a document and access at the point when it can still inform participation.

The same distinction between formal and effective access emerged from **freedom-of-information practice**. Across the region, CSOs continued to report delayed responses, institutional non-response, incomplete information and insufficient explanations when

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[112] Law on Freedom of Access to Information of Brčko District, Official Gazette of Brčko District 38/2025.
[113] Commissioner for the Right to Information and Protection of Personal Data, Order No. 280/2025 on the model transparency programme for public authorities. https://idp.al/wp-content/uploads/2026/01/Urdher-nr.-280-miratimi-Programi-model-i-transparences-per-autoritetet-publike.pdf
[114] Order No. 281/2025 on the model transparency programme for local self-government units. https://idp.al/wp-content/uploads/2026/01/Urdher-nr.-281-miratimi-Programi-model-i-transparences-per-Njesite-e-Veteqeverisjes-Vendore.pdf
[115] MCIC and Civil Society Resource Centre, Government Mirror: Annual Report from Monitoring ENER 2025. https://rcgo.mk/wp-content/uploads/2026/07/government-mirror-2025-csrc.pdf

access was refused. The form and scale of these problems varied considerably. North Macedonia illustrates the distinction between procedural compliance and substantive access: nearly 70% of surveyed organisations reported receiving responses within the legal deadline and approximately the same proportion received information in a clear and machine-readable format. At the same time, 47.5% reported that the response did not actually provide the specific information requested, while clear justifications for refusals remained rare.[116] In Bosnia and Herzegovina, independent monitoring found that 37.6% of examined FOI requests went unanswered, while 43% of surveyed organisations that received responses considered the information unclear and 29% reported refusals without explanation. Montenegro showed similar implementation weaknesses, with only 42% of surveyed organisations receiving requested information within the prescribed period. In Türkiye, official statistics shows that 83% of FoI requests were positively answered, when it comes to requests by CSOs, this rate drops drastically. According to preliminary findings of the survey, 10% of the responses provide requested information partially, due to the exceptions and broad discretion provided to public officials to reject information requests by legislation. These findings show that compliance with a formal deadline does not necessarily provide the clear and complete information required for public scrutiny.

Appeal and sanction mechanisms remained available but did not consistently prevent recurring violations, producing some of the sharpest contrasts across the region. Kosovo's Information and Privacy Agency received 927 complaints, including 238 from NGOs, and imposed 18 fines,[117] while Montenegro reported no fines under its FOI law. In Bosnia and Herzegovina, breaches were more often addressed through appeals, administrative disputes or repeated decision-making than through fines or personal accountability. The practical weakness therefore lies not only in obtaining information, but also in the limited consequences when institutions fail to comply with their legal obligations.

In Albania, the Commissioner identified 87 complaints submitted by CSOs in 2025, with information disclosed in 69 cases following intervention. Two formal decisions ordered disclosure, while one rejected a complaint. The Commissioner's intervention helped CSOs obtain the requested information, but the available data do not indicate whether sanctions were imposed in response to their complaints.

Serbia represents the most extreme case: the Commissioner received 8,802 new appeals in 2025 and carried over another 12,302, resulting in 21,104 appeals under consideration - the highest number since the institution was established.[118] At the same time, 502 misdemeanour warrants were issued because public authorities failed to act within the prescribed deadline, and fines were paid in 405 cases. The Serbian case demonstrates that

[116] Prizma (BIRN Macedonia), Doubled Number of Complaints for Free Access to Public Information, 4 May 2026. https://prizma.mk/udvoen-brojot-na-zhalbi-za-sloboden-pristap-do-informatsii/
[117] Information and Privacy Agency of Kosovo, Annual Performance Report 2025. https://aip.rks-gov.net/download/raporti-vjetor-i-performances-se-agjencise-2026-sqarim-raporti-nuk-eshte-aprovuar-akoma-nga-kuvendi-i-republikes-se-kosoves/
[118] Annual Report of the Commissioner for Information of Public Importance and Personal Data Protection for 2025)

an active oversight and sanctioning system can coexist with persistent institutional non-compliance.

In Türkiye, applicants whose information requests are rejected or who do not receive a response within the legal timeframe have the right to appeal to the administrative court or the Board of Review for Access to Information. In 2025, 2,525 appeal applications were made to the Board, a total of 2,525 applications, including the applications made in previous years, were decided, but there is no segregated data on the percentage of CSO application. Out of these decisions, 1,278 were rejections, 511 were rejections on procedural grounds, 370 were partial approvals and partial rejections, 272 were approvals, 16 were approvals on procedural grounds, 51 were decisions for further examination and 27 were redirected to relevant institutions. Disciplinary penalties are stipulated for violations of legislation, but there is no available data on its implementation.

The regional weakness is consequently not a complete absence of information but the gradual loss of its practical value through delay, fragmentation and inconsistent implementation. Documents are frequently published, requests are often eventually answered, and appeal mechanisms remain available. Yet drafts released only after the direction of a policy has been decided, information dispersed across institutional websites, unclear or incomplete responses and remedies delivered only after lengthy proceedings cannot support meaningful participation. Effective access requires information to be available at the point when it can still influence public decisions, in a format that can be used, and through an enforcement system capable of corrections before the relevant process is complete.

3.2.3. CSOs' Representation in Cross-Sector Bodies

Participation in cross-sector bodies remained one of the clearest examples of the difference between civil society being present and being treated as an equal partner. Legal and institutional frameworks provide opportunities for CSO representatives to sit in advisory, consultative and working bodies, but in practice they do not consistently ensure transparent selection, balanced representation or influence over decisions.

Legal guarantees vary considerably. Montenegro provides the clearest format model, as public authorities are required to include at least one CSO representative in working and advisory bodies through public calls with predefined criteria.[119] Elsewhere, participation is more fragmented or dependent on institutional discretion or sector-specific arrangements. North Macedonia has provisions requiring CSO participation in certain bodies, such as the Council for Cooperation between the Government and Civil Society, but lacks a standardised mechanism for selecting representatives across institutions. Albania provides structured channels for participation in EU-accession and other sectoral

[119] Regulation on the election of NGO representatives to working bodies and the conduct of public debates, Official Gazette of Montenegro 41/18. https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04

bodies, but lacks a standardised transparent procedure for selecting representatives across these mechanisms. Bosnia and Herzegovina has no general obligation or harmonised guidelines ensuring CSO representation across its different levels of government. Similarly Türkiye lacks standardized and transparent mechanisms and has partial legislative mandates allowing CSO participation, but decisions remain at the discretion of ministries. The regional framework consequently ranges from mandatory inclusion with defined procedures to institutional discretion.

The transparency of selection remains a more significant regional concern. In Albania, an application procedure exists for CSO membership in EU-integration consultation tables and requires refusals to be justified, but does not specify detailed evaluation criteria. Reported variations in institutional practice, including direct invitations based on previous cooperation or institutional preference, raise concerns about transparency and equal opportunities for participation. In Kosovo, only a small share of surveyed organisations reported being selected through publicly announced procedures, while direct invitation or appointment remained at similarly low levels. Serbia presents the most serious concern, as the increasing inclusion of GONGOs and phantom organisations in working groups raised questions about whether formal representation reflected independent civil society or was used to legitimise predetermined positions. Since Türkiye has no measures or guarantees in place to ensure enabling conditions for CSO representatives to involve and freely express their views in advisory boards, ministries often bypass open calls in favor of directly inviting politically aligned organisations, undermining representation, particularly in sensitive advocacy areas.

Once included, CSO representatives were generally able to present critical positions without direct sanctions arising from their participation in cross-sector bodies. Albania reported no evidence of state control, harassment or sanctions resulting from positions expressed in advisory or working-group settings. Serbia likewise recorded no cases of excessive state control specifically linked to critical positions taken within working groups. However, this should be viewed against the broader context in Serbia, where a significant number of CSOs withdrew from cooperation with the executive and legislative authorities amid deteriorating conditions for civil society, while organisations publicly expressing critical positions continued to report pressure and harassment. This suggests that the stronger regional weakness lies in access and selection rather than in formal restrictions on representatives' ability to speak once they are included. It does not, however, establish that CSO representatives consistently exercise equal influence over decisions.

Participation in cross-sector bodies also generally did not prevent CSOs from pursuing alternative advocacy when institutional engagement proved ineffective. Organisations continued to use public communication, petitions, coalition-building, protests and other forms of advocacy alongside participation in formal bodies. In some cases, organisations deliberately preferred such channels where participation in working bodies was considered ineffective or risked legitimising decisions they could not influence.

Overall, cross-sector bodies remained an established mechanism for civil society participation in 2025, but the regional standard was met unevenly. The principal weakness

lies less in the formal possibility for CSOs to participate than in whether participation is systematic, based on transparent and predetermined selection criteria, and sufficiently open to independent and relevant organisations. Once selected, representatives were generally able to defend their positions and continue using other advocacy channels, but weaknesses in selection and uneven access continued to limit the inclusiveness and legitimacy of cross-sector representation.

3.3 Collaboration in Service Provision

3.3.1. CSO Engagement in Service Provision and Competition for State Contracts

CSOs are legally allowed to provide services across the region, including in social protection, education, healthcare, legal aid, child protection, support for victims of violence, research and training. They generally have to meet the same service-quality and licensing requirements as public or commercial providers. The main regional gap lies between this formal eligibility and CSOs' actual ability to enter service-contracting procedures on an equal and predictable basis. However, Türkiye has no general regulation or incentive regarding the participation of CSOs in these processes. Although there are some examples in practice, the instances where services are provided by CSOs are limited and depend on the discretion of public institutions. The practice of licensing before providing services to CSOs, as seen in various countries, is not present in Türkiye.

The legal position of CSOs as service providers remained broadly enabling, with one notable expansion recorded in Albania. The new Law on Alternative Family Care [120] explicitly recognises licensed NPOs with relevant experience as partners of municipalities in supporting children and families, training foster families and strengthening local capacities. Its practical effect will depend on secondary legislation that had not yet been adopted during the reporting period. Elsewhere, the existing legal position remained largely unchanged. North Macedonia maintained a registry of licensed social-service providers and recorded ten newly licensed or renewed civic providers in 2025, while Kosovo placed NGOs, private entities and public institutions within the same licensing system.[121] In Bosnia and Herzegovina and Serbia, CSOs may provide services across a range of sectors, although recognition and applicable requirements remain more uneven in some areas.

Being allowed to provide services did not translate into broad **access to state contracts**. Across the available survey evidence, most CSOs did not compete for public-service contracts at all. In Kosovo, only two of 97 surveyed organisations competed for a service contract through public procurement, although this does not capture services financed through state NGO grants, while in North Macedonia 9% of surveyed organisations received a public-service contract and 87% did not apply. In Bosnia and Herzegovina, only 3% of surveyed CSOs received a service contract, 6% applied unsuccessfully and 92% did not apply. In Serbia, all three surveyed organisations that applied were awarded contracts, but only two of the 15 ministries responding to information requests had concluded a service contract with a CSO. The main regional finding is therefore not that most applicants were rejected, but that most organisations did not enter service-contracting procedures at all.

Licensing and registration requirements create another barrier, even where they formally apply equally to all providers. Organisations in Montenegro reported complicated

[120] Law No. 92/2025 On Alternative Family Care in the Republic of Albania, Official Gazette 9/2026. https://www.sherbimisocial.gov.al/wp-content/uploads/2026/02/Ligji-92-2025.pdf
[121] Administrative Instruction (MLSW) No. 02/2020 on Licensing NGOs and Private Legal Entities Providing Social and Family Services. https://gzk.rks-gov.net/ActDetail.aspx?ActID=36039

procedures and long waiting periods, including cases in which delays in licence renewal left an organisation temporarily classified as unlicensed and unable to apply for service funding. Serbian service providers similarly described extensive documentation requirements and prolonged administrative processing: one organisation providing an SOS telephone service for victims of violence reported waiting four years for an official response Bosnia and Herzegovina presents a different version of the same problem: CSOs are not necessarily subjected to stricter requirements, but some sectoral laws and regulations do not clearly recognise them as service providers.

Transparency and fairness remain difficult to assess because consolidated information on service tenders, applicants and awarded contracts is frequently unavailable. Albania publishes procurement procedures and successful operators, but does not maintain complete data showing the participation of NPOs, the budgets involved or the use of procedures reserved for non-profit providers. The similar is reported in Kosovo, where only 24% of surveyed CSOs considered state service contracts fair and transparent, while 38% disagreed. Although the available evidence does not establish widespread conflict of interest across the region, limited data and low participation make it difficult to determine whether CSOs are competing with other providers on genuinely equal terms.

Examples of functioning cooperation remained visible, particularly in social services, support for survivors of violence, disability services, education and professional training. Municipalities in Albania reported several partnerships with NPOs, while organisations in Bosnia and Herzegovina described gradual improvement in cooperation within particular service sectors. These examples confirm that CSOs possess the expertise and capacity to provide specialised services. They do not, however, amount to a predictable regional system and remain dependent on the municipality, ministry, sector or funding instrument involved.

The central discrepancy is therefore between what CSOs are permitted to do and the opportunities they receive in practice. CSOs may legally provide services, but opportunities are commonly offered through short-term project calls, licensing procedures can interrupt rather than protect service continuity, and information is too fragmented to demonstrate fair competition. A supportive system would distinguish service contracts from ordinary project grants, apply proportionate licensing requirements, recognise professional experience, publish complete information on applicants and awards, and ensure that selection criteria give sufficient weight to quality and continuity. Until these conditions are met, CSOs will remain a small and irregular part of publicly funded service delivery despite their recognised expertise and legal right to participate.

3.3.2. State Funding and M&E of CSO-Provided Services

The main threat to CSO-provided services is not the absence of legal funding mechanisms, but the short-term and project-based way in which those mechanisms are used. CSOs can generally receive public funding through procurement, grants, budget transfers or other

contracting arrangements. However, these mechanisms do not consistently distinguish between financing a temporary CSO project and purchasing a continuous public service. Organisations providing shelter, counselling, legal aid, social protection or support to vulnerable groups are consequently expected to meet long-term public needs through funding designed for temporary projects.

The legal possibility of concluding longer contracts differs between countries, but practice produces similar uncertainty. North Macedonia's framework does not allow CSOs to secure multi-year funding commitments for service provision, while Serbian legislation permits multi-year contracts but public authorities conclude them only for the current year. Serbian providers must therefore resubmit extensive documentation and repeat the administrative procedure whenever a contract expires. Kosovo's principal call financed services for 12 months, while a later call for providers in northern municipalities covered only five months,[122] without guaranteed renewal or interim funding between calls. In Bosnia and Herzegovina, support for service providers also remained annual and dependent on budgets, calls and administrative decisions. A positive example was the allocation of BAM 1 million to all five safe houses in the Federation of Bosnia and Herzegovina, but this too remained annual programme funding rather than a permanent service-contracting model. Different legal arrangements therefore led to the same practical result: organisations delivering continuous services could not reliably plan beyond the current funding cycle.

The adequacy of funding is an equally significant problem. In Albania, organisations providing social services described state support as almost absent and insufficient to cover service costs, including administrative and institutional overheads. Serbian organisations similarly reported relying primarily on foreign donors and project funding, including organisations providing psychological and legal assistance to queer women. Kosovo's principal funding call could cover between 70% and 100% of eligible project costs and allowed expenditure on professional staff, food, medication, utilities, maintenance and some indirect organisational expenses. However, no standard method linked approved amounts to the actual full cost of maintaining a continuous service. North Macedonia's partial and fragmented funding model was more developed in social protection and healthcare than in other service areas but remained inaccessible or unattractive to a significant part of the sector. Public funding may therefore cover individual activities or selected direct costs without ensuring the organisational stability needed to keep services continuously available.

The funding mechanism itself can further determine whether support is suited to service provision. In Montenegro, CSOs seeking service contracts through public procurement must be registered to perform economic activities,[123] while organisations funded through general CSO calls do not face this requirement. The latter route is easier to access but

[122] Ministry of Justice of Kosovo, Public Call for Financial Support for Projects of Licensed NGOs in the Field of Social and Family Services, 5 November 2025. https://md.rks-gov.net/wp-content/uploads/2025/11/Thirrja-Publike-5.11.2025.docx

[123] Law on Public Procurement of Montenegro. https://ujn.gov.me/zakon-o-javnim-nabavkama-sluzbeni-list-crne-gore-br-074-19-od-30-12-2019-003-23-od-10-01-2023-011-23-od-27-01-2023-preciscen-tekst/

remains governed by project-funding rules that are not well suited to continuous service delivery. This illustrates a wider regional problem: the most accessible public-funding mechanisms for CSOs are often those least suited to financing continuous services.

Monitoring provisions are generally more developed than the funding arrangements they oversee. Montenegro allows financial review, monitoring of activities and visits to service premises with prior notification, while North Macedonia combines ministerial oversight of expenditure and effectiveness with specialised monitoring of service-quality standards. Serbia also prescribes monitoring through sectoral laws, licensing rules and service standards, and the ministries that reported concluding contracts with associations reviewed records of services provided and implementation reports.

In practice, however, monitoring remains considerably stronger for expenditure and contractual compliance than for service quality, beneficiary outcomes and longer-term impact. Monitoring in Bosnia and Herzegovina remained focused primarily on financial justification and activity reporting, while no public evaluation was identified in Kosovo assessing the quality, results or longer-term impact of CSO-provided services or how it influenced later funding decisions and service standards. In Albania, the near absence of state-supported service contracts also meant that systematic public monitoring and evaluation had little opportunity to develop.

The regional weakness is therefore a mismatch between the continuous nature of many CSO-provided services and the funding systems used to support them. Annual or project-based financing limits predictability, insufficient coverage shifts part of the cost onto providers and donors, and monitoring remains more focused on whether funds were spent correctly than on whether services achieved sustainable results for beneficiaries. A more enabling system would treat essential CSO-provided services as services rather than projects: allowing multi-year contracts, covering their realistic full costs and linking financial oversight with systematic assessment of service quality and outcomes.

Conclusions and recommendations

The 2025 findings point to a persistent and, in several countries, deepening disconnect between the formal recognition of civil society and the conditions needed for it to operate independently and effectively. While the nature and severity of challenges differ across the Western Balkans and Türkiye, the recurring weaknesses in implementation, protection of fundamental freedoms, financial sustainability and meaningful participation reveal that the enabling environment cannot be improved through legislative and institutional reforms alone. The deterioration of civic space in parts of the region, compounded by the disruption of international funding, has further exposed the vulnerability of civil society organisations and the risks to their long-term capacity to fulfil their democratic, watchdog and service-provision roles.

These challenges require a shift in how governments and international partners approach civil society development: from formal commitments and fragmented support measures towards consistent implementation, institutional accountability and sustained investment in the sector's independence and resilience. Public authorities must be held accountable not only for adopting appropriate frameworks but also for ensuring that they function in practice, while civil society must be recognised as an independent democratic actor rather than merely a stakeholder to be consulted or a project implementer. For the EU, this also means ensuring that enlargement assessments, reform priorities and financial assistance give sufficient weight to independent civil society evidence and the practical conditions in which civic actors operate. The following recommendations identify the priority measures needed to address these structural weaknesses and translate existing commitments into tangible improvements across the region:

1. **Shift the reform focus from adopting frameworks to ensuring implementation and enforcement.** Governments should simplify administrative procedures, establish clear and consistent implementing rules, strengthen institutional responsibility for compliance and ensure effective remedies when legal obligations are ignored. Monitoring of the enabling environment should increasingly assess whether existing rights and mechanisms can actually be exercised in a timely and predictable manner.

2. **Strengthen protection of civic actors and accountability for restrictions on fundamental freedoms.** Authorities should investigate and sanction attacks, threats, excessive policing, unlawful surveillance and other interference with civic activity; introduce effective anti-SLAPP safeguards; refrain from adopting “foreign agent”-type legislation or other measures stigmatising foreign-funded organisations; and ensure that political and institutional actors do not contribute to the delegitimisation of independent

civil society. Particular attention should be given to organisations and defenders exposed to compounded risks because of their work on human rights, gender equality, LGBTI rights, anti-corruption and other politically sensitive issues.

3. **Apply genuinely risk-based and proportionate AML/CFT and banking measures.** Governments, financial intelligence authorities and financial institutions should avoid blanket categorisation of CSOs as high risk and base enhanced measures on demonstrated and specific risks. Regulatory authorities should work with civil society and the banking sector to reduce unnecessary documentation, delays and restrictions while maintaining legitimate safeguards against financial abuse.

4. **Reform public funding into a transparent, predictable and strategically diversified system of support.** Governments should establish clear and comparable budget allocations, maintain publicly accessible funding databases, publish calls in advance, ensure timely disbursement and apply transparent selection and complaints procedures. Authorities should regularly publish the results and impact of funded projects, including their contribution to public-interest objectives. Support should extend beyond project grants to include core funding, accessible pre-financing and co-financing mechanisms. Fiscal incentives and targeted policies should also encourage individual and corporate philanthropy and private-sector cooperation.

5. **Make civil society participation earlier, more consequential and institutionally supported**. Public authorities should involve CSOs before key policy choices have been made, provide adequate consultation periods and documentation, and publish clear explanations showing how contributions were considered. Cooperation councils and other permanent mechanisms should have functioning mandates, adequate resources and access to decision-makers, while representative-selection procedures should be transparent and inclusive. Digital consultation and information platforms should operate reliably and complement, rather than substitute for, meaningful dialogue.

6. **Recognise CSOs as employers and strengthen the human-resource infrastructure of the sector.** Authorities should produce regular and comparable statistics on CSO employment, ensure equal access to employment-support programmes and take the sector's project-dependent operating model into account when designing labour and employment policies. Volunteering rules should be simplified and made comprehensive, while public incentives for volunteering should become operational. Education policies should create more systematic pathways linking civic education with volunteering, internships and practical engagement with CSOs.

7. **Develop service contracting that reflects the continuous nature and full cost of CSO-provided services.** Public authorities should distinguish service contracts from ordinary project grants, enable multi-year arrangements where services are continuous, and ensure that funding covers professional staff as well as reasonable administrative and institutional costs. Licensing should be proportionate and adapted to CSOs without lowering service-quality standards. Contracting procedures should prioritise quality and expertise alongside price, while monitoring should assess not only expenditure and formal compliance but also service quality, accessibility, beneficiary outcomes and impact.

Annexes

Monitoring Matrix Framework and Methodology

The Monitoring Matrix on Enabling Environment for Civil Society Development is a detailed theoretical framework based on international human rights and freedoms and regulatory practices of European countries and the EU. The framework is built around three core areas: Basic Legal Guarantees of Freedoms; Framework for CSOs' Financial Viability and Sustainability; Government – CSO Relationship, each divided in sub-areas. The areas are elaborated by standards, which are further specified through legal and practice indicators. For each indicator there is a clear guidance on the data gathering strategy which should be utilized by country researchers, including publicly available data, FoI requests, survey, focus groups and interviews, as well as relevant secondary sources.

The Monitoring Matrix is a comprehensive methodology, developed in 2013 and last revised in 2023, designed to assess the environment for CSOs in the Western Balkans and Türkiye against international standards. The Matrix operates on an annual reporting cycle which ensures a e systematic and comparable evaluation across the region and across years, helping stakeholders track progress or regression, identify gaps and emerging trends, and prioritize reforms.

The research undertaken aims to provide evidence on the enabling environment for civil society development and to influence the support of governments, the European Union and other donors towards more sustainable and strategic development of the sector. 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. On European level, the MM findings have been consistently used in the EC Country reports of the Enlargement Package, and as of 2024 in the Rule of Law Report.

Operationalization and Data collection

There are 3 areas, 8 sub-areas, 22 standards and 129 indicators defined in the monitoring methodology. The **legal indicators** are measured by coding the presence or absence of rules, costs, procedures and obligations enshrined in legal regulation (primary and secondary) and policy frameworks enacted in the respective countries. To assure standardization and comparability of the data gathering process regarding the **practice indicators**, country researchers follow a methodology plan in which each of the 80

indicators are further operationalized in concrete mandatory and additional data types (i.e. operationalized dimensions of a practice indicator) to be reported across the countries. The mandatory data types tap into the core building blocks of a practice indicator as described in the Monitoring Matrix Toolkit. They mandate the reporting of optimal information without which one could not be able to evaluate the respective indicator. The additional data (operationalized dimensions) specified for each practice indicator are reported if country researchers want to deepen and further illustrate specific practice indicator (e.g. via case study; see next section on country-specific notes on methodology).

The data gathering strategy for the practice indicators is tailored to match the mandatory data types specified in the methodology plan. For each indicator there is a clear guidance on the data gathering strategy (instruments and sources) which should be utilized by country researchers. The specified data gathering instruments and sources follow an implicit hierarchy, in which publicly available factual data (e.g. official statistics) are the most important source of data for assessing practice indicators, followed by survey data from civil society organisations, which in turn is followed by relevant secondary sources (e.g. from CSOs reports, Ombudsman and media). Finally, at the end of the hierarchy are focus groups and interview data, being subjective type of data, which covers smaller groups of respondents.

The two core-data gathering instruments for data gathering for the Monitoring Matrix exercise are survey and freedom of information (FoI) requests. For most of the indicators, further triangulation through secondary sources (CSO and international reports, media content etc.) is recommended. In addition to these instruments, an adequate number of focus groups and expert interviews should be conducted, to deepen the analysis.

FoI requests should be extensively used when public information and statistics on the state of civil society and their environment (primary factual data) are not readily available. This practice in itself is a 'pressure' towards institutions to increase transparency and produce relevant information on the state of CSOs and their environment. The researchers can draw from a detailed bank of FoI questions tailored to match the operationalized practice indicators.

The **survey questionnaire** collects information on CSOs' experiences and perceptions on the key aspects of the enabling environment for civil society. The organisational survey includes 42 questions matching the mandatory data types (operationalized dimensions) on basic rights and freedoms, organisational and financial sustainability, and civil society's cooperation with the state. The questionnaire dominantly consists of closed questions, and fewer follow-up open questions which require the respondents to elaborate on their experience. The same questionnaire is implemented across all countries, and only the formulation of few items is slightly adapted to the concrete country context to assure questions are understood by respondents. The data collected from the survey is confidential and used strictly on anonymous basis. Individual responses are not connected to the organisations which answered the survey and reported only in an aggregate form.

The survey is sent to lists of formal CSOs compiled and updated by country researchers on the basis of available registers or other alternative lists of active CSOs in the country. For a

successful survey which reflects the state of enabling environment in the country, the key aspect is creating a survey list which reflects the population of CSOs in the country. The list should be updated with new organisations on an annual level. If the researchers cannot update the list with organisations retrieved through official records, then they should map new actors in the policy process on local and national level. As per the sampling approach, using a mixed strategy of organisational-centered sampling involving the use of ready-made organisational lists (if available by state and/ or voluntary registers) and a policy-centered sampling involving organisations which are active in policymaking across policy fields is recommended.

Focus groups will primarily serve to provide an in-depth insight into the experiences and perspectives of CSOs. The survey will help in identifying key issues to be addressed and deeper explored through focus groups. There should be 3-5 focus groups organized in each country, with 8-12 people per FG, preferably including the following types of CSOs: Non-formal/Non-registered actors including grass-root organisations, Decentralized/Small organisations and/or outside the capital operating CSOs, Service-providing CSOs, CSOs involved in cooperation/consultation processes, cross-sector bodies (although this will be covered also as a horizontal issue in the rest of the FGs), and Gender, youth and/or environment organisations (or other sectors where the survey shows increased challenges). Gender issues should be part of all focus groups as a cross-cutting theme. Focus groups will serve also to check the findings on the enabling environment gathered through the survey, bringing in cases from practice when it comes to basic legal guarantees of freedoms, framework for CSOs' financial viability and sustainability, and CSO-government cooperation framework.

Expert Interviews will serve to get a more detailed perspective of relevant stakeholders on specific parts of the enabling environment, collect information on useful secondary data, and also get their insight into the more general civil society situation. There should be 10-15 expert interviews conducted per country with the following stakeholders: CSOs or think-tanks dealing with enabling environment issues, Media associations or CSOs dealing with freedom of expression, CSOs with expertise on Tax/fiscal framework and practices, National level umbrella or representative body on issues such as volunteerism, (if applicable), and National banking association representative. The interviews will deepen the findings on enabling environment, and also help in identifying key challenges and needs of civil society. In addition to the guiding questions provided, researchers can formulate additional questions that capture contextual developments in the country.

Data analysis and interpretation

To analyse and interpret the data, country researchers use a unified data collection template which provides the indicators description (including the mandatory and additional data types for the practice indicators) and five category descriptions ranging from fully enabling to fully disabling environment provided under each indicator. The five category descriptions are specified for each legal and practice indicator in the Monitoring

Matrix Toolkit, to enable researchers – based on the reported data – to choose one code (score) which most accurately summarizes the state of enabling environment concerning the respective indicator. In a first step, the researcher reports the required data types collected through different sources in the template box. For example, they report factual data from primary sources complemented with descriptive statistics or cross tabulations based on survey data. In a second step, they choose one of five category descriptions specified for the respective indicator which best illustrates the reported data. The categories enable unified comparison of findings on the level of indicators across all country reports.

The system was created to address the need for 'compressed' and effective visual communication of findings and a systematic presentation of the changes in the enabling environment for CSDev in terms of standards across countries and years. It does not replace, but rather complements the qualitative assessment, as the narrative country reports are the basis on which categorization is conducted. In this context, the Monitoring Matrix online platform has also been updated and redesigned to be more user-friendly and assist in the achieving of the goals of the Monitoring Matrix, i.e. enable a more practical and efficient method for tracking the enabling environment for CSDev, as well as help in the drawing of comparisons between the countries in the region.