Joint Civil Society Contribution on Civic Space to the 2025 Annual Rule of Law Report

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1. Introduction and general recommendations

The EU Rule of Law Cycle remains a crucial mechanism for safeguarding democratic principles and upholding the rule of law across the European Union. Since the launch of the Rule of Law Mechanism, civil society organisations (CSOs) have actively contributed to the process through annual consultations and by offering recommendations to enhance the instrument. These organisations consistently underline the interconnectedness between the rule of law and the broader democratic ecosystem — including civil, political, and socio-economic rights — emphasizing that the rule of law cannot be addressed in isolation from the functioning of democracy and effective access to fundamental rights.

The 2025 edition of the European Commission's Rule of Law Report comes at a critical moment in history. The geopolitical landscape has been profoundly transformed, with escalating attacks on the primacy and universality of international law and multilateral institutions. These global dynamics are increasingly mirrored within Europe, where civic space, media freedom and fundamental rights face intensifying threats.

Political developments in 2024 and early 2025 — including the European Parliament elections and national electoral shifts in several Member States — have further empowered forces that are hostile to the foundational values enshrined in the EU Treaties and the Charter of Fundamental Rights. The resulting domestic policies in some Member States have directly undermined the rule of law, fundamental rights and the institutions designed to protect them.

The already alarming situation regarding the rule of law has been further exacerbated by the return of Donald Trump to the U.S. presidency and his renewed hostility toward the global human rights institutional framework. His administration's imposition of sanctions on the International Criminal Court (ICC) and its officials — in direct response to the Court's investigations into crimes in Israel/Palestine — constitutes a grave attack on global justice mechanisms. Also devastating for access to rights among the most deprived populations is the complete halt of USAID programmes. Meanwhile, the SLAPP ruling holding Greenpeace entities liable for more than $660 million in the Energy Transfer trial exemplifies a broader regression in civil liberties. These actions find resonance in narratives emerging from European political figures advocating similar policies within the EU, thereby weakening collective efforts to uphold the rule of law and protect fundamental rights.

Within the EU, several Member States have openly challenged the authority of international and regional courts. For instance, some have refused to enforce ICC arrest warrants — including for Israeli and Palestinian individuals charged with war crimes — and questioned the authority of the International Court of Justice (ICJ) in cases such as its findings on the plausibility of genocide in Gaza. Others are systematically not implementing the judgements of the European Court of Human Rights, with dramatic consequences on individuals in EU member States. These actions not only represent a weakening of international accountability mechanisms, but also raise serious concerns about the EU's internal coherence in upholding its Treaty-based obligations.

Despite these concerning developments, there have been positive signals. We welcome the European Commission President Ursula von der Leyen's renewed commitment to prioritising the rule of law, the improvements in stakeholder engagement and the explicit connection between rule of law recommendations and access to EU funding. We equally welcome the European Commission's recognition of the need to address challenges to civic space by proposing a dedicated civil society strategy, and fostering cross-border cooperation among not-for-profit associations through the proposal for a European Cross Border Association Directive. The decision by Germany's Federal Office for the Protection of the Constitution to classify the far-right Alternative für Deutschland (AfD) as a threat to constitutional principles — due to its ethnically exclusionary rhetoric — offers an encouraging example of robust domestic action in defense of democratic norms.

Nevertheless, serious concerns persist regarding the Rule of Law Report's qualitative assessments, particularly regarding the monitoring of restrictions on civil society, human rights defenders, and the press. **In light of the profound and growing challenges to democratic governance and the rule of law, the European Commission must significantly raise the ambition of its Rule of Law Cycle, improve the impact of the Rule of Law Report's recommendations, and take decisive action against systematic violations in EU member states.** This includes integrating the interdependence between rule of law, fundamental rights, and international legal obligations, and recognizing breaches within the EU as part of a broader international crisis.

To maintain its credibility and effectiveness, the EU must adopt a comprehensive, transparent, and consistent approach. This also means expanding the scope of the rule of law to include compliance with binding decisions of international and regional courts and reinforcing protections for civic space and democratic institutions. **Ultimately, a shift from a reactive to a preventive approach is needed to uphold the rule of law across the EU** — not just as a legal construct, but as the foundation of the European project and its global standing.

Additionally, we call on the European Commission to:

1. **Include a stand-alone chapter on civic space in the EC's annual Rule of Law Reports.** Civic space remains under pressure through funding constraints, legal harassment, and attacks on freedom of assembly, association and expression, while systemic human rights threats — such as restrictions on protests and marginalised groups' rights — are increasingly overlooked.

2. **Review the timing and format of the Rule of Law Cycle and strengthen the involvement of civil society**. Civil society organisations, particularly those working with marginalised groups, should be involved in the EC's rule of law country visits in a more structured way. CSOs should also be enabled to view the contributions of Member States, in order to respond, verify and contextualise data provided by the Member States.

3. **Establish a mechanism for civil society, media, and human rights defenders to continuously report violations on the ground** and develop a fast-track process at EU

level to respond early and consistently when the backsliding of rule of law and democracy escalates in a country.

4. **Provide clearer, more specific and time-bound recommendations,** indicating concrete activities or action plans to be taken by Member States and the time frame to be followed to redress the situation.

5. **Guarantee a transparent assessment of progress.** The report should assess more transparently the effectiveness of reforms beyond Member States' reporting, and include benchmarks aiming at assessing the visible and measurable impact (outputs) of legislation or reforms adopted or started (inputs), in strengthened cooperation with CSOs, independent experts and NHRIs. The role of the EU Fundamental Rights Agency (FRA) should be strengthened to allow for comprehensive assessment of civic space developments in Member States.

6. **Ensure continuity between recommendations to sanctions.** Systematic non-compliance with the country-specific recommendations (CSRs) should trigger further enforcement actions from the rule of law toolbox, such as funding conditionality.

7. **Facilitate interaction among the various actors involved in the process** — including the judiciary, independent bodies, media, academia, civil society organizations, EU institutions, and Member States — through thematic reviews.

8. Lastly, to strengthen its commitment to upholding the rule of law, **the EU should implement a mandatory human rights impact assessment for all legislative proposals** put forward by the European Commission.

The present submission analyses cross-country trends on civic space in the EU and proposes priority country-specific recommendations (CSRs) for most EU Member States, as well as seven candidate and potential candidate countries (Albania, Bosnia and Herzegovina, Georgia, Kosovo, Montenegro, North Macedonia, Serbia, and Turkey).

This document was prepared by Civil Society Europe (CSE) together with the members of CSE's Working Group on Civic Space and Fundamental Rights. We would like to thank in particular the European Civic Forum (ECF), Civil Liberties Union for Europe (Liberties), the European region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA-Europe), the Platform for International Cooperation on Undocumented Migrants (PICUM), the European Youth Forum (YFJ), the European Partnership for Democracy (EPD), the Young European Federalists (JEF Europe), Philanthropy Europe Association (Philea), Culture Action Europe, and Access Info Europe.

2. Snapshot of civic space and fundamental rights in 2024

Civic space continued to shrink in Europe in 2024, with widespread smear campaigns emboldening governments to adopt restrictive laws, in particular on the right to peaceful protest and freedom of association. Human rights are equally under increasing pressure, with stricter migration policies, inadequate protections for vulnerable groups, and rising discrimination and hate speech impacting minorities across the region.[1][2]

Layers of reinforcing attacks led to a continued closing of vibrant civic spaces and an increasing number of direct attacks against human rights defenders and civil society organisations. **In 2024, all countries reported one or more restrictions to civic freedoms, with a noticeable deterioration in multiple Member States.**[3][4]

In a first-ever attempt of classification to feed into the European Commission's 2025 Rule of Law Report, the following sections present a non-exhaustive overview of countries where new or persistent issues related to civic space have been identified. Despite the overall negative context, some positive developments in selected countries are also highlighted. The overview is organised as follows:

a. **Countries that have made some progress**. These countries have taken concrete steps to improve civic space, especially in response to European Commission or civil society recommendations.
b. **Countries with no or limited progress on standing recommendations.** These countries have failed to act on previous European Commission or civil society recommendations aimed at improving civic space. While some may have made some positive steps forward, previous recommendations remain relevant as the core issues have not been addressed.
c. **Countries facing serious challenges**. These countries are experiencing intensifying threats to civic freedoms, such as legal restrictions, repression of protest, surveillance, and defunding of CSOs.
d. **Countries with systemic challenges**. These countries are facing deep-rooted, structural threats to civic space, including the systematic attack or criminalisation of dissent and the erosion of democratic institutions. Civic space is actively being dismantled.
e. **Countries under Article 7 procedure**. This is a country where the EU has triggered Article 7 of the Treaty on European Union due to serious and systemic breaches of EU values (e.g. rule of law, democracy). The civic space is highly restricted, with ongoing authoritarian practices.
f. **Candidate countries.**

[1] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.
[2] European Civic Forum, upcoming annual report on civic space, 2025.
[3] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.
[4] European Civic Forum, upcoming annual report on civic space, 2025.

a. Countries that have made some progress

Austria

The Austrian government passed the Freedom of Information Act in 2024, following the European Commission's 2023 recommendation to "advance with the reform on access to official information taking into account the European standards on access to official documents." The majority of the law will only come into force in September 2025.[5]

Czechia

A bill establishing a National Human Rights Institution and the creation of a Children's Ombudsman was approved in January 2025, following the European Commission's 2024 recommendation to "continue to advance the legislative changes to establish a National Human Rights Institution taking into account the UN Paris Principles."[6]

Latvia

Although no recommendations on civic space were issued by the European Commission in 2024, it is noted that in October 2024 the new Cabinet of Ministers Regulation No. 639, Procedures for Public Participation in the Development Planning Process came into force. This regulation aims to enhance opportunities for civil society representatives to participate in state and municipal development planning processes.[7] It mandates that participation must be ensured not only in development planning and legislative drafting but also in other initiatives of public significance, particularly with regard to the use of public funds. Additionally, the regulation encourages the use of modern public engagement methods, such as think tanks, the deliberative method, dialogue circles, and other innovative approaches to foster meaningful public involvement.[8]

b. Countries with no or limited progress on standing recommendations

Ireland

No progress to address legal obstacles related to access to funding for civil society organisations, as part of the reform of the Electoral Act. As a result, many CSOs receiving public funding continue to limit or otherwise self-censor themselves for fear of the impact that advocacy on certain issues could have on their funding.

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[5] European Civic Forum, upcoming annual report on civic space, 2025.
[6] European Civic Forum, upcoming annual report on civic space, 2025.
[7] European Civic Forum, upcoming annual report on civic space, 2025.
[8] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.

Spain

Although reform proposals were presented in 2024, many of the most controversial provisions of the Gag Law remain intact. These include sanctions for disobedience to authority and the prohibition of disseminating images of members of the security forces in the exercise of their duties.[9]

No progress was also recorded with regard to the misuse of the Penal Code, spyware abuse, censorship, and repression of legitimate protests.

Poland

The appointment of a new civil society minister was welcomed by organisations in the sector. However, thus far the minister has not taken any visible legislative action, even though civil society expert groups have made concrete proposals.

Extensive changes have been introduced at the National Freedom Institute-Centre for Development of Civil Society (NIW-CRSO), which is the key state-run agency for the funding, support and development of civil society. Furthermore, some progress was achieved in the framework for regulating public consultations at the parliamentary level. However, migrant rights groups have been sidelined in the government's recent proposals on migration which suspend the right to asylum. Additionally, judicial independence reforms have been stifled by presidential veto.[10] Poland's new government also began reversing the previous administration's repressive cultural policies, but legal cases from the earlier period continued.

Despite some progress, concerns remain about the restrictions on the right to peaceful assembly, with climate groups being particularly targeted and publicly attacked by the new government. Several organisations and activists who have provided humanitarian aid to migrants at the border with Belarus are facing criminal charges.[11]

c. Countries facing serious challenges

The Netherlands

Legislators have proposed multiple blanket prohibitions of peaceful assembly at certain times or in certain areas, introducing new, generic grounds for prohibiting action ("disrupting public order"), thus disregarding internationally established legal standards for determining limitations of the right to peaceful assembly.[12] Use of excessive force and surveillance against Palestine and climate protesters is also a concern.[13]

[9] European Civic Forum, upcoming annual report on civic space, 2025.
[10] European Civic Forum, upcoming annual report on civic space, 2025.
[11] European Civic Forum, upcoming annual report on civic space, 2025.
[12] European Civic Forum, upcoming annual report on civic space, 2025.
[13] European Civic Forum, upcoming annual report on civic space, 2025.

Civil society has faced significant funding challenges. A new law granting the government broad powers to investigate funding sources has been passed, allowing increased scrutiny of CSOs for alleged foreign influence, although its exact implementation remains under political debate. Additionally, the tax deductibility of private gifts has been reduced. Notably, large gifts — those exceeding €1.5 million per year — are now effectively taxed at around 30%. Combined with government budget cuts in the social domain, culture, and international cooperation, these measures have led to a significant decline in available funding.[14]

France

2024 was marked by a series of attacks against civic initiatives, undermining civic space and associative freedoms. Security concerns surrounding the Olympic Games were used as a pretext for repressive practices against social activists, including surveillance. The right to peaceful assembly was repeatedly limited, targeting in particular the environmental rights and Palestine solidarity movements.[15]

The implementation of the Contract of Republican Engagement (CER) led public authorities to stop funding "dissenting" associations.[16]

Guaranteeing secularism has increasingly been used to justify restrictions disproportionately affecting freedom of expression of Muslim people.[17]

Germany

There is still no clear legal provision regarding the advocacy work of CSOs, leaving them vulnerable to losing their non-profit status. During the February 2025 federal elections, parliamentarians questioned the legitimacy and public funding of advocacy-focused CSOs. Members of the far-right Alternative for Germany (AfD) party continued their intimidation tactics by reporting CSOs — particularly those countering right-wing extremism — to tax authorities, often successfully revoking their status.[18] In 2024, the financial stability of many CSOs remained fragile, with systemic precariousness persisting.[19]

Civil society also voiced concerns over growing restrictions on freedoms of association, peaceful assembly, and expression. Reporters Without Borders documented 89 attacks on journalists and media outlets in 2024.[20] A newly formed Coalition against Transnational Repression highlighted the lack of protection for individuals and diaspora groups facing intimidation by authoritarian regimes of their countries of origin.

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[14] European Civic Forum, upcoming annual report on civic space, 2025.
[15] European Civic Forum, upcoming annual report on civic space, 2025.
[16] European Civic Forum, upcoming annual report on civic space, 2025.
[17] European Civic Forum, upcoming annual report on civic space, 2025.
[18] European Civic Forum, upcoming annual report on civic space, 2025.
[19] European Civic Forum, upcoming annual report on civic space, 2025.
[20] Reporters Without Borders, "Close-Up 2025: RSF Report on Press Freedom in Germany", 2025.

Police violence against climate activists and the Palestine solidarity movement is a major concern. Research by the European Legal Support Centre has documented over 760 incidents since 2019 — many of them in 2023 and 2024 — including censorship, arrests, and smear campaigns.[21] The systematic targeting of solidarity with Palestine has led to a generalised chilling effect and self-censorship, with widespread negative repercussions on democratic debate.[22]

d. Countries with systemic challenges

Italy

Several regulatory changes have further enabled the criminalisation of solidarity, particularly towards sea rescue NGOs. It was confirmed that the Italian government ordered its secret services to spy on several individuals linked to the search and rescue NGO Mediterranea Saving Humans and at least one journalist using the Paragon military software Graphite. High-level officials also continued to publicly vilify CSOs working on migration.[23]

Several restrictions have been imposed on the right to protest via new security measures, which have been used to target environmental and climate activists and the Palestine solidarity movement.[24] Worryingly, the government took the abrupt and arbitrary decision to transform the draft security bill into a decree, which was swiftly approved by the Council of Ministers, bypassing Parliament.[25]

In addition, the government has failed to systematically consult civil society on newly proposed regulations which affect civic freedoms.

Slovakia

After the elections, government-organized non-governmental organizations (GONGOs) began to emerge, particularly in the youth and student sectors. There have been several verbal attacks by government officials against young activists who had expressed disagreement with the government's actions, effectively preventing others from speaking up due to fear of retribution.

Several human rights NGOs have been cut off from sources of funding and state support, particularly regarding human rights education, leading to layoffs in several organizations.

The government targeted independent cultural institutions, as well as blocked all funding for culturally-related LGBTQ+ projects despite positive assessments by expert panels. The Ministry

[21] European Legal Support Center, Executive Summary of the ELSC database of anti-Palestinian repression.
[22] European Civic Forum, upcoming annual report on civic space, 2025.
[23] European Civic Forum, upcoming annual report on civic space, 2025.
[24] European Civic Forum, upcoming annual report on civic space, 2025.
[25] European Civic Forum, upcoming annual report on civic space, 2025.

of Culture dissolved Kunsthalle Bratislava's independence by merging it with the Slovak National Gallery.

On 15 April 2025, Slovakia passed a "lobbyists" law that imposes additional administrative requirements on NGOs regarding their sources of funding. It also requires the disclosure of sensitive information at the request of third parties (any individual), without providing any safeguards.

Bulgaria

A draft FARA bill was submitted again to Parliament in 2024. The proposal was clearly designed to exclude civil society organisations (CSOs) and dissidents from public life by labelling them as "foreign agents". While the FARA bill was ultimately rejected, efforts to discredit CSOs persist.

The drafting of a Lobbying Law has raised concerns about potential misuse against civil society, as a revised version approved in February 2024 removed key distinctions between lobbying and advocacy, effectively replicating some of the logic behind the FARA law proposal.

New discriminatory amendments targeting the LGBTQIA+ community were introduced to the Pre-school and School Education Act, undermining fundamental freedoms and democratic principles in contravention of the European Convention on Human Rights.[26]

e. Countries under Article 7 procedure

Hungary

The decade-long dismantling of civic space continued with renewed vigour in 2024. A new piece of legislation, the Protection of National Sovereignty Act, was added to the government's "toolbox" for obstructing civic space. Restrictive legislation was not repealed, smear campaigns and vilification remained a routine practice, and CSOs' opportunity to engage in civic participation remained limited.[27] In 2024, Hungary also intensified its long-standing policy of centralising control over culture and implemented significant budget cuts affecting the cultural sector.

The Defence of Sovereignty Act, passed in late 2023, remained in effect, with the creation of the Sovereignty Protection Office (SPO) being the most important development of 2024. The SPO, which is tasked with investigating and reporting on any organisations or individuals perceived as critical, has already published misleading reports containing disinformation and factual errors. Although it lacks sanctioning powers, the SPO's reports contribute to smearing and vilifying independent and critical organisations.[28]

[26] European Civic Forum, upcoming annual report on civic space, 2025.
[27] European Civic Forum, upcoming annual report on civic space, 2025.
[28] European Civic Forum, upcoming annual report on civic space, 2025.

The blocking of and lack of transparent and accessible state funding remained an issue and led to an increased dependency on unsustainable crowdsourcing and foreign funding for independent civil society.[29]

On 13 May, 2025, a member of the ruling Fidesz party submitted a new bill entitled "Transparency of Public Life", which would enable the government to target, defund and dissolve any organisation it designates as "a threat to Hungarian sovereignty".[30]

f. Candidate countries

Serbia

The corruption-fueled collapse of the Novi Sad train station canopy led to the death of 16 people and triggered nationwide protests that continue to this day. Many attacks on protesters through brute force were recorded, alongside frequent arrests of students and activists, who have been subjected to prolonged and unjustified detention. In addition, there has been a sharp rise in threats and attacks against journalists, while CSOs have been pressured through office raids, smear campaigns and SLAPPs. Amnesty International revealed that Serbian authorities used spyware to monitor journalists and opposition activists by hacking into their mobile phones. Environmental rights groups protesting against Rio Tinto lithium mining have also faced significant restrictions.

Although public funding schemes in the field of youth formally exist, many grant calls are reportedly won by GONGOs. Decisions are often made at the discretion of the institutions, with minimal transparency. For this reason, foreign donors and their grants represent the majority of funding for youth organisations. These donors were also subject to public smear campaigns by high government officials, and as of early 2025 a foreign agents bill is being discussed in the Serbian parliament. The unexpected termination of USAID support has undermined CSO sustainability and been used by authorities to justify increased scrutiny of critical former recipients.

Georgia

Since May 2024, the rule of law and democracy in Georgia have sharply declined. The ruling Georgian Dream party passed a Russian-inspired foreign agents law, targeting civil society and stalling EU accession talks. This sparked widespread protests, which were met with violence. Following contested parliamentary elections, the government escalated its crackdown and introduced another law aimed at suppressing the free press, silencing dissent, and restricting the rights to assembly and protest. The repression of cultural figures also intensified.

A new Foreign Agent Law was also adopted in April 2025, specifically targeting independent civil society organizations and media entities. The Georgian Dream party also announced

[29] European Civic Forum, upcoming annual report on civic space, 2025.
[30] Civil Liberties Union for Europe, "Open letter on the Hungarian Bill entitled Transparency of public life", endorsed by 320+ CSOs, May 2025.

amendments to the Law on Grants of Georgia, according to which issuing a grant will require approval from "The Government of Georgia or an authorized person/body designated by the Government of Georgia" for the donor.

3. Key pan-European developments and trends affecting civic space in 2024

We have identified multiple pan-European, horizontal trends regarding civic space in 2024 that should be included and addressed in the European Commission's 2025 Rule of Law Report. We have organised them according to the following elements of civic space: **a) freedom of association; b) freedom of assembly; c) freedom of expression; d) public participation; e) access to funding; and f) other elements.**

In addition to negative trends, we have noted some positive developments throughout 2024 and in early 2025. Notably, in its 2025 work programme the European Commission included a pledge to adopt a Civil Society Strategy, a longstanding demand of civil society organisations across all Europe.[31] While to date the details of the initiative are yet not known, the Strategy could have the potential to significantly address many of the civic space challenges outlined in the following paragraphs.

a. Restrictions to the freedom of association

Threats to the freedom of association in 2024 were reported in most Member States, namely **Bulgaria, Croatia, Czechia, Estonia, France, Germany, Greece, Hungary, Italy, Ireland, Latvia, Lithuania, Malta, the Netherlands, Romania, Slovakia, Slovenia, and Sweden**. Organisations working with minorities, LGBTQIA+ communities and on environmental protection faced the most significant and numerous obstacles.[32]

Foreign Agent Restriction Acts (FARA) and other restrictive laws

Many governments introduced, maintained, or proposed laws that limit the operating space for NGOs, with a particular emphasis on laws that focus on 'foreign agents', 'foreign interest representation services' and lobbying restrictions. This is echoed in the most recent report by the Secretary-General of the Council of Europe, where he states that "so-called foreign influence laws are shrinking civic space in several states."[33] Draft or final laws have been recorded in **Bulgaria, Hungary, France, the Netherlands, Slovakia, and Georgia**. In **Hungary**, following the adoption of the Sovereignty Protection Act in December 2023, in 2024 the Office of

[31] Civil Society for EU manifesto, endorsed by 254 CSOs.
[32] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.
[33] Council of Europe, "Towards a new democratic pact for Europe", May 2025.

Sovereignty Protection launched several investigations into NGOs and investigative journalists.[34][35]

Additionally, within the EC's Defence of Democracy Package, a proposed EU Directive aiming to "introduce common transparency and accountability standards in the internal market for interest representation activities carried out on behalf of third countries" has had unintended consequences and puts civil society at risk.[36] The proposal is already encouraging some national political actors to restrict civic space. For example, **Bulgaria**'s far-right party claimed during a parliamentary debate about their proposed FARA that they are merely preparing for the adoption of the planned EU Directive.[37]

Further restrictive laws were also introduced or implemented in **Estonia** (amendments to Law Enforcement Act), **France** (CER law), **Italy** (NGO Decree), and **Spain** (Gag law).[38]

Attacks on civil society and human right defenders

Civil society actors and human right activists have been increasingly subjected to verbal and physical attacks, legal harassment, and smear campaigns. Political leaders in several countries continued to scapegoat marginalised groups and promote anti-rights rhetoric, with LGBTQIA+ individuals, migrants, racialised people, and other minorities particularly affected, especially in **Bulgaria, Denmark, Finland, Hungary, Italy, Portugal, Romania, Slovakia, Albania, North Macedonia, and Serbia.** Notably, various types of online and media harassment are rapidly translating into funding restrictions and legal actions against both individuals and organisations. Such threats have been reported in numerous countries, including **Belgium, Croatia, France, Germany, Ireland, Italy, the Netherlands, Romania, Slovakia, Slovenia, and Spain.** Cases of physical violence against civil society and activists occurred in **Croatia, France, Italy, the Netherlands, Romania, and Serbia.**[39]

At the **EU level**, attacks to undermine the legitimacy of CSOs engaged in advocacy work are ongoing.

b. Restrictions to the freedom of assembly

Freedom of peaceful assembly threatened across Europe

The right to peaceful protest has been under increasing threat, with demonstrations being banned, protest locations restricted, and heavy penalties enforced. Many countries including **France, Germany, Greece, Ireland, Italy, Hungary, the Netherlands and Romania** cited

[34] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.
[35] European Civic Forum, upcoming annual report on civic space, 2025.
[36] Civil Society Europe, "Briefing paper – Defence of Democracy Package", April 2024.
[37] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.
[38] European Civic Forum, upcoming annual report on civic space, 2025.
[39] European Civic Forum, upcoming annual report on civic space, 2025.

increased and disproportionate use of force by the police and several countries sought to cement restrictions through changes in the laws on the right to protest.[40][41]

Environmental and climate activists and Palestine solidarity groups were among the most targeted, as well as LGBTQIA+ solidarity groups in certain countries such as **Hungary,** where a new law banned all LGBTQIA+ public assemblies. Some organisations report not organising protests due to fear of retribution or due to state-initiated bureaucratic obstacles, such as being required to finance private security in addition to the police presence (**Serbia**).[42]

Criminalisation of migration and solidarity

Criminalisation of solidarity and search and rescue operations have further complicated the operating environment for CSOs and activists advocating for migrant rights, as seen in countries like **Bulgaria, Cyprus, France, Greece, Italy, Latvia, Malta and Poland**. Media monitoring conducted in 2024 reveals that at least 142 individuals faced judicial proceedings for actions in solidarity with migrants.[43]

Media articles, trial monitoring, and civil society reports continue to highlight the 'routine criminalisation' of people crossing borders irregularly – especially after disembarkment - as well as violations of fair trial standards. Criminalisation of people crossing borders irregularly under counter-smuggling legislation is also growing in several countries, with at least 91 cases reported in 2024 in **Cyprus, Greece, Italy and Spain**.[44]

c. Restrictions to the freedom of expression

Censorship

In many countries, laws aiming at banning LGBTQIA+ related initiatives were introduced or proposed. In March 2025 **Hungary** passed a law banning any public assembly that infringes the "anti-LGBTI propaganda" elements of the 2021 Amendments to the Child Protection Act — known as the "anti-LGBTI propaganda" law — which are currently subject to EU infringement. As a result, all LGBTQIA+ related public assemblies are now illegal in Hungary, with organisers facing potential prison sentences. A similar anti-LGBTQIA+ propaganda law was adopted in **Bulgaria** in August 2024, with a second version currently making its way through Parliament. **Italy** adopted in September 2024 a resolution banning "gender ideology", while fringe political parties in **Romania** tabled two anti-LGBTQIA+ propaganda bills in November 2024, which were voted down in January 2025. A draft bill was tabled in the **Slovakian** parliament in September

[40] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.
[41] European Civic Forum, upcoming annual report on civic space, 2025.
[42] European Civic Forum, upcoming annual report on civic space, 2025.
[43] Platform for International Cooperation on Undocumented Migrants, "Criminalisation of migration and solidarity in the EU - 2024 report", April 2025.
[44] Platform for International Cooperation on Undocumented Migrants, "Criminalisation of migration and solidarity in the EU - 2024 report", April 2025.

2024 seeking to explicitly define "nontraditional sexual orientation" and prohibit its "promotion" in educational settings. Schools found in violation of this ban could face fines of up to €30,000. The bill did not pass but efforts to retable it are ongoing. In September 2024 **Georgia** adopted an anti-LGBTQIA+ amendment package, which includes a ban on advertising, broadcasting, public demonstrations or information in all educational institutions regarding same-sex relations. A bill entitled "On the Ban of LGBTI Marches and Relevant Colorful Items", aiming to ban all public expression related to LGBTQIA+ symbols, was submitted to the Georgian Parliament in April 2025.

Access to information, attacks on journalists and media freedom and pluralism

Information has become increasingly difficult to access. Several countries, including **Croatia, France, Germany, Italy, Spain and Slovakia**, imposed new restrictions or continued to utilise restrictive measures on access to information – thus hindering accountability and trust in public institutions.[45]

In **Serbia**, independent journalists were subjected to assaults, threats — including death threats — and smearing by pro-government media outlets and high-ranking public officials.[46]

Restrictions to artistic freedom

Growing limitations on artistic freedom — both the freedom of artistic expression and the autonomy of cultural institutions — have been recorded. According to the Eurobarometer survey on Europeans' attitudes towards culture,[47] 20% of respondents disagree with the statement that artists in their country can freely express their ideas and opinions without fear of censorship or retaliation by the national government.

Artistic freedom and the autonomy of cultural institutions are increasingly under threat from political parties and anti-democratic political and social movements. Examples include: budget cuts targeting cultural institutions that produce non-traditional, diverse, or experimental art not aligned with the ruling party's ideology; dismissal of cultural leaders based on their political views or affiliations; threats and censorship directed at specific creative works or exhibitions.

Many of these infringements on artistic freedom are instigated by ruling parties, leaving artists with little recourse to national legal protections.

d. Restrictions to public participation

Civil society actors continue to face legal harassment

[45] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025
[46] Human Rights Watch, "World Report 2025", January 2025.
[47] European Commission, "Eurobarometer survey on Europeans' attitudes towards culture", May 2025.

2024 marked two significant milestones in strengthening public participation and protecting civic space. The EU institutions made history by adopting an anti-SLAPP Directive in February 2024, setting the minimum standards to protect public watchdogs against abusive litigation in the form of SLAPPs (Strategic Lawsuits Against Public Participation). Furthermore, in early April 2024, the Council of Europe issued anti-SLAPP recommendations, setting out a robust framework for deterring and remedying SLAPPs.[48]

However, the impact and success of the anti-SLAPP Directive depends on its swift and effective transposition and implementation by Member States, which has not occurred yet in the majority of countries. As a result, SLAPPs and other forms of legal harassment have continued to be a persistent issue across several EU Member States, targeting CSOs, individual activists, HRDs, and journalists and media outlets. SLAPPs have been documented in several countries, including **Bulgaria, Romania and Serbia**. In **Croatia, Hungary and Italy** SLAPPs are regularly used by politicians and other powerful actors aiming to discourage journalist investigations and silence their critical views.[49] The Coalition Against SLAPPs in Europe (CASE) identified a total of 1.049 cases in the period 2010-2023.[50]

Structured involvement of organised civil society remains weak

The lack of genuine public consultation and public engagement in political decision-making was reported from a large number of EU countries, including **Croatia, Estonia, Germany, Greece, Hungary, Ireland, Romania, Slovakia, Slovenia, Spain and Sweden.**[51][52] Shortcomings in access to information and the lack of structured civil dialogue frameworks result in limited possibility for CSOs to submit comments and express concerns regarding the proposed bills. In countries such as **Poland, Slovenia and Spain** organised civil society is included in public consultations in a tokenistic way, meaning that its input is not adequately taken into consideration.[53]

e. Access to funding

Funding landscape worsened in most of European countries

The funding environment for CSOs has significantly deteriorated in several countries. As a consequence of funding cuts for humanitarian assistance and development support under the Trump administration in the USA, significant reduction of funding has been reported in **Belgium, Croatia, Czechia, Cyprus, Estonia, Greece, Malta, Poland, Portugal, Romania,**

[48] Council of Europe, "Recommendation CM/Rec(2024)2 of the Committee of Ministers to member States on countering the use of strategic lawsuits against public participation (SLAPPs)", April 2024.
[49] European Civic Forum, upcoming annual report on civic space, 2025.
[50] Coalition Against SLAPPs in Europe, "SLAPPs in Europe: mapping trends and cases", December 2024.
[51] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025
[52] European Civic Forum, upcoming annual report on civic space, 2025.
[53] European Civic Forum, upcoming annual report on civic space, 2025.

Slovenia, Sweden, Georgia, North Macedonia, Serbia, and Turkey.[54][55] As access to funding is becoming increasingly politicised, critical CSOs are being defunded or pushed to tone down their messages in countries such as **Belgium, Czechia, Denmark, Finland, France, Germany, the Netherlands, Romania, Spain, Sweden, Serbia, and North Macedonia.**[56]

Cuts to financial support have led to substantial constraints on the operations and reach of CSOs. At the same time, increasing administrative burdens and bureaucratic repression — often justified through anti-money laundering (AML) and counter-terrorism financing (CTF) frameworks — have further restricted civic space. This has included the criminalisation of crowdfunding platforms, particularly in the context of growing securitisation efforts, as observed in countries such as **Albania, North Macedonia, and Serbia.**[57]

At the **EU level**, attacks which aim to question the legitimacy of CSOs who receive core funding through programmes such as LIFE and CERV have created a climate of uncertainty for civil society actors, many of whom rely significantly on EU funding to operate.

Tax incentives for philanthropic giving are currently under review in **Belgium, France, the Netherlands, and Poland.**

f. Other elements

Ombudspersons, national human rights institutions (NHRIs), equality bodies and other independent authorities that exercise non-judicial legal control over the political branches play an important role in defending the rule of law and ensuring a strong civic space. However, in 2024, the autonomy of key institutions continued to face significant challenges. For instance, the political interference in the selection of the heads of independent bodies and their operation has remained a concern in **Bulgaria, Germany, Greece, Ireland, Malta, Romania, Slovakia and Sweden,** along with a trend of severe underfunding.[58] Moreover, the effective functioning of NHRIs has been critically hindered by a lack of financial, legal and human resources in several Member States. This challenge is reinforced by the minimal influence these institutions have on political authorities, most notably due to a lack of enforcement powers and the national governments' reluctance to implement their recommendations. Such problems were reported in **France, Germany, Hungary, Ireland, Lithuania, and Malta**. Some Member States like **Czechia and Italy** still lack National Human Rights Institutions.[59]

[54] ECRE and other CSOs, Open letter, April 2025.
[55] European Civic Forum, upcoming annual report on civic space, 2025.
[56] European Civic Forum, upcoming annual report on civic space, 2025.
[57] European Civic Forum, upcoming annual report on civic space, 2025.
[58] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025
[59] Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025", March 2025.

4. Country-specific recommendations on civic space and fundamental rights

The following section presents an **assessment of the degree of implementation of the European Commission's 2024 country-specific recommendations on civic space and fundamental rights, along with proposals by CSOs based on the contributions of members of Civil Society Europe (CSE)'s Working Group on Civic Space and Fundamental Rights.** The recommendations are addressed to the authorities of the Member State in question.

Austria

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Prioritise establishing and systematising structured civil dialogue to ensure open, inclusive, ongoing and transparent participation of civil society at all stages of the policy- and decision-making processes.
- While an independent body to investigate allegations of police violence was set up in 2023, action is needed to strengthen its effectiveness and ensure that police misconduct is addressed with appropriate measures.
- Refrain from harassing climate activists through legal and other means and respect the right to peaceful assembly.

Additionally, the following new recommendations are proposed:

- Secure core funding for civil society organisations' activities and services to strengthen their long-term stability and independence.

Belgium

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Take measures to ensure compliance by public authorities with final rulings of national courts and the European Court of Human Rights.	**No progress.** The Belgian government should take immediate action and commit to the implementation of national and regional court judgements.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Belgian authorities should guarantee that human rights defenders are not subject to any forms of attacks and intimidation and, when such cases occur, ensure they are investigated efficiently and the perpetrators are held to account.

Bulgaria

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Refrain from proposing FARA laws that stigmatise and attack civil society in the future.
- Guarantee the uninterrupted work of the Council for the Development of the Civil Society and provide it with administrative resources and a budget, ensuring the Council can carry out its lawful tasks in a timely manner.

Additionally, the following new recommendations are proposed:

- Ensure that the proposed Lobbying Law is drafted through an open and transparent procedure and that the law does not include any provision aiming to ban legitimate advocacy activities from CSOs.
- Ensure that civic actors, human rights defenders, and journalists are protected from SLAPPs by transposing Directive (EU) 2024/1069 (the anti-SLAPP Directive) introducing legal safeguards for both cross-border and purely domestic case and by applying the Commission Recommendation (EU) 2022/758.
- Repeal the amendments to the Pre-school and School Education Act banning comprehensive sex education and information regarding homosexuality in pre-school and school educational institutions.
- Adopt a law which regulates volunteering and supports civil society organisations working with volunteers.

Croatia

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Continue efforts to address the issue of strategic lawsuits against public participation targeted at journalists, including by reviewing the legal provisions on defamation and encouraging wider use of procedural rules that allow dismissing groundless lawsuits, taking into account the European standards on the protection of journalists.	**No progress**. SLAPPs and legal harassment remained a problem in 2024. There were no efforts to engage with civil society and other relevant stakeholders in discussion of the implementation of the Commission's findings and recommendations, besides occasional participation in the few discussions organised by civil society.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- In an inclusive, genuine and constructive process, the government should promptly develop and adopt a new National Plan for Creating an Enabling Environment for Civil Society Development until 2027, which will systematically tackle the issues faced by civil society, such as funding, access and participation in decision-making processes, and institutional framework for civil society. The work of the Council on Civil Society Development needs to be reset to work in line with its mission and purpose by 2025.

Cyprus

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Take concrete measures to end any legislation or policy which encourages racism, hate speech, xenophobia and intolerance against migrants, refugees and racialised people in Cyprus. Take action to combat extremist narratives and racist rhetoric in the media and public discourse.
- Ensure thorough, independent, impartial and prompt investigation of complaints presented by civil society organisations and activists regarding harassment, attacks, smear campaigns, and threats. Implement effective measures to ensure the safety of their employees, members and service users.

Czechia

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Continue to advance the legislative changes to establish a National Human Rights Institution taking into account the UN Paris Principles.	**Full implementation**. A bill establishing a National Human Rights Institution and the creation of a Children's Ombudsman was approved in January 2025.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Fully implement the Strategy for Cooperation between Public Administration and NGOs (2021-2030), including dedicated state budget funds, build capacity and competences for managing participatory processes in public policy, and establish a long-term evaluating mechanism for participation in decision-making across central authorities.

Additionally, the following new recommendations are proposed:

- Ensure that the law on the regulation of lobbying does not adversely affect the participation of experts and civil society actors in government advisory bodies and does not stigmatise or impose unjustified administrative burdens.
- Amend the legislation on the state budget settlement to enable multi annual funding of subsidy programmes.

Denmark

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Advance with the process to reform the Access to Public Administrative Documents Act in order to strengthen the right to access documents, in particular by limiting the grounds for rejection of disclosure requests, taking into account the European standards on access to official documents.	**Some progress.** In January 2024, the Danish Parliament made an agreement to set up an expert committee tasked to submit proposals for amending the Access to Public Administrative Documents Act, ensuring greater access to documents in the political decision-making processes.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Take urgent steps to protect excluded groups, in particular the LGBTQIA+ community and ethnic and religious minorities from discrimination, hate speech, attacks, harassment and assaults online and offline, in line with European standards.

Additionally, the following new recommendations are proposed:

- Strongly reject political calls for the defunding of civil society, and urgently implement measures to ensure stable and transparent funding for its functions.
- Ensure alignment between Danish legislation and both international conventions and ECtHR rulings.
- Respect the right to peaceful assembly and freedom of expression, in line with international human rights standards.

Estonia

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Advance with the efforts to ensure consistent and effective implementation of the right of access to information taking into account European standards on access to official documents.	**No progress.** The Public Information Act ensures transparency, yet its implementation can be inconsistent, particularly for sensitive issues. The overuse of "for internal use" classifications, a designation applied to government documents limiting their public accessibility, has led to excessive secrecy, hindering public access to information and eroding trust between citizens and the state. The Public Information Act should be revised to reduce the overuse of "for internal use" classifications and promote proactive disclosure of information.
Ensure effective public consultation in the context of the legislative process.	**Some progress**. While the government has issued guidelines for public consultations, their implementation varies across ministries and local governments, leading to uneven engagement practices. Digital tools have enabled civic participation but also highlighted disparities in accessing them. Challenges in national consultations remain, including short timelines, limited access to

	draft proposals, and insufficient resources to engage effectively.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Enforce a civic engagement framework that ensures structured, transparent, and consistent dialogue processes across all levels of government.

Additionally, the following new recommendations are proposed:

- Address the cuts of funding for CSOs and implement measures to ensure stable and transparent funding.
- Refrain from amending the Law Enforcement Act in a way that creates civic space restrictions and endangers the fulfilment of freedoms of expression and peaceful assembly, protected by international human rights standards.

Finland

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Prioritise sustainable budgeting that safeguards core civil society functions, and preserve civil society funding by reallocating resources from less socially critical areas.

France

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Urgently amend the law "on the respect of the republican principles" and withdraw the so-called "Contrat d'engagement républicain" (CER) in line with international human rights standards on freedom of association.
- The French government should provide reparations to civil society organisations whose funding was suspended and/or whose activities were not authorised due to the law "on the respect of the republican principles". The reparations should be provided from the same year that the funding was suspended and/or certain activities were not authorised.
- Beyond amending the aforementioned law, the Minister of Interior should cease using dissolution proceedings or reviews of subsidies' allocations as a means to exert pressure and harass critical CSOs.

Additionally, the following new recommendations are proposed:

- Strengthen the mechanisms monitoring and sanctioning abuses in relation to the application of secularism to ensure it is not used to justify restrictions disproportionately affecting civic freedoms for Muslim people.
- Respect the right to peaceful assembly and freedom of expression, in line with international human rights standards.
- Promote an enabling environment for civil society by halting all attacks on CSOs. In cases of police and judicial harassment, the perpetrators should be held accountable immediately.

Germany

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Advance with the plan to create a legal basis for a right to information of the press as regards federal authorities, taking into account European standards on access to official documents.	**No progress.** Germany has still not advanced with the plan, and some areas are being completely excluded from the right to information by the press. For instance, the courts deny any rights of the press to receive any information about pardon decisions made by the President.
Take forward the plan to adapt the tax-exempt status for non-profit organisations with a view to address the challenges which the currently applicable rules present for their operation in practice, taking into account European standards on funding for civil society organisations.	**No progress.** The Tax Update Act, which was passed by the Federal Cabinet in July 2024, contains only a very vague reformulation. As a result, there is still no clear legal provision on the purposes recognised as charitable, nor are there clear rules on their uniform interpretation by the tax authorities.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Clarify the application of the revised 'Repatriation Improvement Act' (*Gesetz zur Verbesserung der Rückführung*) adopted by the Bundestag on 18 January 2024 regarding the criminalisation of solidarity with migrants and rescue operations. The revision allows for assistance to undocumented migrants to be penalised even when there is no financial element, which could hinder the provision of support to irregular migrants in Germany. In addition, different legal opinions have warned that, although the proposed

amendment would allow the rescue of adults without penalty, the rescue of unaccompanied minors in distress at sea could now become a criminal offence.

- The tax law that is *de facto* regulating most civil society organisations (CSOs) in Germany must be reformed to allow and protect public participation and advocacy work of CSOs; the reform process should include a wide consultation with diverse civil society representatives.

Additionally, the following new recommendations are proposed:

- Respect the right to peaceful assembly and freedom of expression, in line with international human rights standards.
- Formally recognise the political mandate of civil society and its stakeholders within the paradigm of deliberative democracy.
- Urgently implement a substantial reduction in bureaucracy with immediate effect, including the elimination of superfluous registration and reporting requirements for civil society organisations.
- Ensure continuous, inclusive, trusting, expertise-based structured dialogue is established between the state and civil society in the policymaking process.

Greece

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Further advance with the process of adopting legislative and non-legislative safeguards to improve the protection of journalists, in particular as regards abusive lawsuits against journalists and their safety, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists.	**No progress.** The Greek parliament still needs to transpose the EU Anti-SLAPP Directive into national law, providing clear procedural safeguards and remedies for journalists. The Ministry of Justice should strengthen protections for journalistic sources and enforce stricter penalties for attacks on journalists.
Step up the efforts to ensure the effective and timely consultation in practice of stakeholders on draft legislation, including by observing the statutory timeframe for public consultation.	**Some progress.** The draft bills are consistently subject to public consultation and follow-up reports address the comments submitted. However, concerns regarding the lack of effective and timely consultation of stakeholders persist, as well as criticism about the practice of adopting omnibus legislation and last-minute amendments.

Strengthen efforts to evaluate the current legal framework for the registration system for civil society organisations and assess whether there is a need to amend it, while moving forward with a structured dialogue with CSOs.	**No progress.**

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Refrain from criminalising humanitarian actors and human rights defenders solely for helping refugees and migrants in need and urgently adopt guidelines which clarify that assistance to people crossing borders or seeking international protection does not constitute a crime.
- Revise the application of counter-smuggling legislation and fair trial guarantees to migrants identified as alleged boat drivers, often identified on the basis of faulty evidence or unreliable testimonies. Convictions are often issued after procedures characterised by lack of fair trial guarantees, such as lack of or inadequate access to legal aid, translation and alternative measures to prevent pre-trial detention.
- Replace all registries with one central registry and simplify requirements for the registration of associations, ensuring they are in line with European and international standards on the freedom of association. This should be done through a structured dialogue with CSOs to ensure that requirements are proportionate and do not hinder their work and activities.

Additionally, the following new recommendations are proposed:

- Ensure full accountability for the mass surveillance scandal, commonly known as 'Predatorgate'.

Hungary

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Remove obstacles affecting civil society organisations and foster a safe and enabling civic space, including by repealing legislation that hampers their capacity of working, in particular the immigration tax.	**Deterioration.** The government made no steps to implement the recommendations, rather, a new piece of restrictive legislation, the Protection of National Sovereignty Act, was added to the government's "toolbox" for obstructing civic space.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Urgently repeal the Defence of Sovereignty Act, the "Stop Soros" laws, the special immigration tax, the transparency of NGOs that influence public life, and the anti-LGBTI propaganda law, which are obstructing civic space and hindering the operation of civil society.
- Stop smear campaigns against CSOs working for democracy, rule of law and sexual and gender minorities. Publicly condemn all attempts by public actors to harass, stigmatise and defame human rights defenders advocating for fundamental rights.

Additionally, the following new recommendations are proposed:

- Urgently withdraw the "Transparency of Public Life" bill.
- Urgently repeal the Act on the Protection of National Sovereignty (LXXXVIII of 2023) and eliminate the Sovereignty Protection Office.
- Refrain from abusing the special legal order and immediately eliminate the situation where the temporary state of emergency becomes de facto permanent.
- Ensure that there is funding transparency and equal access for all CSOs to state funding, including the National Cooperation Fund and Village and Town Civil Funds.
- Refrain from imposing bans on the right to peaceful assembly and expression, in line with international standards.
- Repeal the law banning public assemblies related to LGBTQIA+, adopted in March 2025, which uses the 2021 anti-LGBTQIA+ legislation as the basis for this ban.

Ireland

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Complete the reform of the Defamation Act to improve the professional environment for journalists taking into account European standards on the protection of journalists.	**Some progress.** The Defamation (Amendment) Bill fell when an election was called in November 2024. However, it is expected to be re-tabled shortly, raising strong concerns about the removal of juries from defamation proceedings.
Further continue efforts to address legal obstacles related to access to funding for civil society organisations, as part of the reform of the Electoral Act.	**No progress.**

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Instruct the Charities Regulator to revise their advice on political advocacy for charitable organisations. While the Charities (Amendment) Act was signed into law in July 2024, the Charities Regulator has yet to begin a public consultation on what political activity for organisations "advancing human rights" will constitute.

Additionally, the following new recommendations are proposed:

- The Charities Regulator, the Standards in Public Office Commission and the Electoral Commission should jointly develop a set of guidelines on political activities for charities/NGOs that fully respect fundamental rights and ECJ judgements.
- The Department of Rural and Community Development and state funders should address and remove threats to public funding for NGOs that criticise government policy.

Italy

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Step up efforts to establish a National Human Rights Institution taking into account the UN Paris Principles.	**No progress.**

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Urgently adopt anti-discrimination policies: ensure the independence of UNAR (*Ufficio Nazionale Antidiscriminazioni razziali*); a national plan against racism with integrated tools and adequate funding; a national monitoring system of hate speech and hate crimes; the widening of protection in the field of violence or discrimination on grounds of sexual orientation or gender identity; and a new law on citizenship for people born or raised in Italy.
- Since January 2023, Italy has imposed limitations on search and rescue (SAR) operations (Law 15/2023), allowing vessels to conduct only one rescue at a time. In addition, SAR vessels are assigned with distant ports for disembarkation, limiting their presence in the search and rescue zone, depleting their budget, and drastically reducing their ability to save lives at sea. The government should immediately end these unjustified restrictions of NGOs' SAR work, which continued in 2024 with new rules included in the latest Flows Decree, and cease the criminalisation of SAR activities by NGOs. The government has to ensure that no migrant is left behind during rescue operations.

- The government should ensure that the right to peaceful assembly, protest and strike are protected. In particular, this should be achieved by removing stricter precautionary measures and increased penalties and sanctions against activists participating in demonstrations, repealing the law dubbed "eco vandalism bill", and refraining from using violence against peaceful protesters.

Additionally, the following new recommendations are proposed:

- Remove obstacles affecting civil society organisations and foster a safe and enabling civic space, particularly by repealing the NGO decree, Flows Decree and Security Decree.
- Respect the right to peaceful assembly and freedom of expression in line with international human rights standards.
- Urgently scrap the regulatory intervention which aims to eliminate the VAT exemption regime for non-profit associations and engage in a structured dialogue with civil society on the matter.

Latvia

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Recognise and implement civil dialogue as equal to social dialogue. CSOs still face challenges in accessing decision-making processes, and meaningful engagement is hindered by inconsistent implementation, lack of transparency, and insufficient government commitment to structured dialogue. Designated civil society advisers should be urgently appointed to facilitate structured dialogue with CSOs and develop joint action plans for policy making. Moreover, the legal framework governing civil dialogue should be improved, and the government should ensure that participatory mechanisms are legally binding on decision-makers.
- Strengthen efforts to protect civil society organisations and human rights defenders from hate speech, which has increased in Latvia's digital environment.

Additionally, the following new recommendations are proposed:

- Urgently increase financial support for civil society by introducing new funding programmes to support volunteering and public interest activities and by increasing funding in existing programmes, particularly the NGO Fund.
- Amend the Law on Prevention of Conflict of Interest in the Activities of Public Officials and finalise the guidelines on the key criteria for assessing the risk of conflict of interest, so as to reduce uncertainty and administrative burdens for CSO.

Lithuania

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025
The following new recommendations are proposed:

- Allocate more funding to CSOs and ensure that funding programmes are transparent and foster a healthy environment for CSOs.

Malta

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025
The following new recommendations are proposed:

- Any form of attack on journalists and activists should be appropriately penalised, including through the imposition of disciplinary measures and criminal punishment, depending on the severity of the attack.

The Netherlands

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Address concerns related to bills such as the Transparency of Civil Society Organisations and the bill on criminalising staying in areas controlled by terrorist organisations.
- The government should refrain from unfounded or disproportionate limitations of the right to peaceful assembly (e.g. limitations by emergency order, complicated notification processes, excessive surveillance and ID of protesters, censorship of speech and symbols) and prioritise de-escalation approaches. It should also apply established legal norms and abandon differentiation between protected demonstrations and "disruptive actions".
- Address challenges in the funding landscape for civil society organisations, preventing budget cuts from having a disproportionate impact on CSOs, prioritising dialogue with impacted CSOs on new frameworks, and balancing this with the urgent need for certainty on future funding and cooperation.

Additionally, the following new recommendations are proposed:

- Scrap the draft laws Transparency of Social Organisations Act (WTMO) and Administrative Prohibition of Undermining Organisations Act (WBVOO), which open the

door to political retaliation against CSOs. Avoid rhetoric and proposals questioning the legitimacy of CSO based on their (legal) actions or financing. Make sure any measures limiting the right to association (including access to financing) meet the criteria of necessity and proportionality, and include legal recourse.

Poland

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Continue the ongoing process to improve the framework in which civil society operates, taking into account European standards on civil society organisation.	**Some progress.** Extensive changes have been introduced at the National Freedom Institute-Centre for Development of Civil Society (NIW-CRSO), which is the key state-run agency for the funding, support and development of civil society.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Continue to create an open and structured framework for civil society dialogue to ensure engagement and participation in decision-making processes, as well as financing of CSOs, including but not limited to minimum standards for public consultations.
- Restore the independence of the Constitutional Tribunal and revoke all rulings of the politicised Constitutional Tribunal that have a negative impact on human rights, notably the abortion ban. Remove all neo-judges from their positions (i.e. judges who were appointed or promoted in processes contrary to Polish law by the previous Polish government).

Additionally, the following new recommendations are proposed:

- Take urgent steps to improve the framework in which civil society operates, including by addressing funding gaps for CSOs, especially those working on democracy, human rights, anti-discrimination, and the rule of law. This should be achieved by introducing transparent funding procedures and systemic solutions, as well as incentives to support individual and corporate philanthropy.
- Immediately refrain from verbal attacks on civic activists and CSOs and discontinue all prosecutions of activists providing assistance to those fleeing war and persecution and peacefully exercising their right to protest.

Portugal

No 2024 European Commission recommendations on civic space

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Establish a permanent committee with civil society representatives and government institutions to oversee anti-racist initiatives.
- Provide training to police officers and authorities on how to properly and effectively protect the freedom of peaceful assembly, in line with international standards. Ensure that officials are held accountable for abuses and applied restrictions on peaceful assembly.
- Increase transparency and public participation in decision-making in public institutions to ensure citizens have access to information about government policies and decisions.
- Protect the fundamental rights of targeted and marginalized groups, including immigrants, LGBTQIA+ individuals, and people with disabilities. Ensure equal access to social services.

Romania

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Step up efforts to ensure effective public consultations before the adoption of legislation.	**No progress.**
Take forward the process for obtaining accreditation for two National Human Rights Institutions, taking into account the UN Paris Principles.	**No progress.**

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Scrap the amendment to the law on associations and foundations (Government Ordinance no 26/2000), which would impose severe restrictions on the ability of CSOs to challenge any administrative acts in courts.

- Ensure greater predictability in policymaking and a clear, transparent and predictable legal framework for policymaking that would allow citizens and CSOs to engage in consultation.
- Refrain from abusing laws, legislative proposals, norms and practices to diminish the capacity of civil society to carry out their public interest missions.

Additionally, the following new recommendations are proposed:

- Reduce bureaucratic obstacles for civil society (for instance, the amendments to the GO 26/2000 law and the setup of NGO registries).
- Replicate the designation of civil society representatives which took place in the Economic and Social Council through the Votong.ro platform in the various bodies where civil society has a representation.

Slovakia

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Ensure the effective and independent investigation and prosecution of high-level corruption cases with a view to establishing a robust track record, including by preventing any undue interference in such cases and by restricting the use of the Prosecutor-General's powers to annul final investigatory and prosecutorial decisions.	**Deterioration.** Instead of strengthening the efficiency and independence of the investigation and prosecution of high-level corruption, these efforts have been jeopardized by the abolition of the Special Prosecutor's Office and the National Criminal Agency.
Advance with the process to establish legislative and other safeguards to improve the physical safety and working environment of journalists, including the reform of defamation law, taking into account the European standards on the protection of journalists.	**Deterioration.** In 2024, the number of attacks and threats against journalists (including SLAPPs) increased, and they most often came from government politicians. These threats are often linked to investigative journalism, particularly reporting on corruption, organized crime and politics. Legislative efforts to restrict media freedom have also been reported.
Ensure effective public consultation and stakeholder involvement in the law-making process, including by avoiding excessive use of the fast-track procedure.	**Deterioration.** Multiple government efforts have been reported that aim to undermine citizen and civil society participation at all levels.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Refrain from the overuse and abuse of the fast-track legislative procedure, limiting it to when there are genuine grounds for its application, as provided for in Act No. 350/1996 Coll. on the Rules of Procedure of the National Council of the Slovak Republic.
- Reinstate funding to human rights organisations to ensure they are able to play the watchdog critical to a healthy democracy and desist from enabling smear campaigns against civil society.

Additionally, the following new recommendations are proposed:

- Repeal the amendment to Act No. 213/1997 ("lobbyists" law) that imposes disproportionate administrative requirements on NGOs and raises privacy and GDPR concerns.
- Reverse the abolition of the Special Prosecutor's Office.
- Repeal Act 166/2024 Coll. on certain measures to improve the security situation in the Slovak Republic, which prohibits all gatherings within 50 metres of designated sites and expands the grounds on which assemblies can be banned, introducing vague and subjective criteria that make it easier for authorities to restrict peaceful gatherings.

Slovenia

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Further advance with the process of adopting legislative and non-legislative safeguards to improve the protection of journalists, particularly online, taking into account European standards on the protection of journalists.	**Some progress.** Progress was made in developing legislative safeguards for journalists' protection, including a ban on intrusive surveillance software on devices used by journalists (in the media bill) and protection against SLAPP lawsuits (in the anti-SLAPP bill outline). However, further safeguards are needed as attacks on journalists still took place in 2024, though in lower numbers as compared to previous years.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Urgently develop, in cooperation with CSOs, open and transparent procedures for the allocation of national public funding to CSO funds.

Additionally, the following new recommendations are proposed:

- Take action to guarantee the right to public assembly and ensure safety at such gatherings at all times, especially for historically vulnerable groups.

Spain

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Advance with strengthening access to information, in particular via revision of the Law on Official Secrets, taking into account European standards on access to official documents.	**No progress.**

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- Urgently reform the Penal Code and repeal the provisions of the Gag Law that criminalise peaceful protest, guaranteeing the exercise of the rights to freedom of assembly and expression. This law also continues to give legal protection to the rejection of people at the border, without respecting human rights and international regulations. The reform of the Gag law should be based on an open, inclusive and transparent consultation process with civil society, to ensure it is in line with international standards, including the Venice Commission's opinion. To pay attention to the most elusive articles: Art. 36.6, which penalises disobedience or refusal to identify oneself, and Art. 37.4, lack of respect for an agent of authority.
- Ban the use of rubber bullets so that such dangerous and inherently imprecise weapons cannot be used in public spaces and cause further deaths and injuries.

Sweden

Assessment of implementation of 2024 European Commission recommendations

European Commission 2024 Recommendations	Implementation (**Full implementation / Significant progress / Some progress / No progress / Deterioration)**
Continue efforts to ensure that the reforms to the legal framework for the funding and operation of civil society organisations do not unduly affect civil society engagement.	**Deterioration.** In 2024 the Swedish government cancelled funding for 'ethnic organisations', while the Parliament passed the controversial 'democracy requirements' bill regulating the eligibility of civil society organisations - especially faith-based organisations - to receive public funding.

Joint Civil Society Europe recommendations 2025

The following 2024 civil society recommendations remain relevant:

- The government must ensure that proposed legislation is in line with Sweden's international obligations and protects rights enshrined in the European Convention on Human Rights and other international agreements that Sweden is a party to. Mandatory impact assessments could help achieve this.
- The government must ensure equal treatment of civil society organisations regardless of their focus or type of activities and adhere to national anti-discrimination laws in this respect, especially with regard to Muslim civil society organisations.

Candidate and potential candidate countries

The 2024 European Commission report included Albania, Montenegro, North Macedonia and Serbia. However, the report did not issue specific recommendations to candidate countries.

Albania

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Ensure the timely development of the 2024–2027 Road Map through a transparent and inclusive process that actively involves CSOs and relevant stakeholders from the outset.
- Establish genuine and structured consultation mechanisms with CSOs and strengthen the Partnership Platform for European Integration to ensure transparent, inclusive, and traceable civil society participation in all EU accession chapter discussions and intersectoral working groups, thereby aligning Albania's reform agenda with EU standards and fundamental rights.

Bosnia and Herzegovina

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Stop the adoption of any foreign agents-style legislation.
- Adopt and implement the national Strategy for an enabling environment for CSOs, including the harmonization of laws regulating CSOs on different administrative levels.
- Ensure that future laws on CSO financing and transparency are developed through inclusive consultation processes and aligned with international standards.

Georgia

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Immediately release all individuals who have been unduly arrested during the protests.
- Abolish all legislation that aims to criminalise civil society, journalists, and protesters.

Kosovo

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Amend the Beneficial Owners Registry and finalize the anti-money laundering law to ensure CSOs are no longer misclassified as high-risk entities, enabling smoother registration, operations, and access to funding, including addressing existing barriers to accessing banking services.
- Accelerate the adoption of the Concept Document on Volunteering and the Law on Allocation for Use and Exchange of Municipal Immovable Property to establish a supportive legal framework for volunteer engagement and enable equitable CSO access to public assets for community development.

Montenegro

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Reestablish the Council for cooperation between state authorities and NGOs, ensuring effective involvement of civil society representatives and full implementation of the Strategy on cooperation.

- Ensure full respect for the principles of democracy and legislation on participation of CSOs and the general public in decision-making, especially in cases of high-impact decisions.

North Macedonia

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Resume the stalled legislative process to amend the main Law on associations and foundations, ensuring inclusive consultation processes with civil society.
- Reactivate the Council for Government-Civil Society Cooperation and ensure meaningful civil society participation in overall policymaking.

Serbia

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- Cease all attacks against protesters and CSOs and implement measures to enhance basic freedoms and protect civic actors from harassment, surveillance, attacks and smear campaigns that occur equally in the public and online space.
- Cease all institutional and judicial pressure against civic actors and develop anti-SLAPP mechanisms to protect journalists, media and activists from malicious lawsuits.

Turkey

Joint Civil Society Europe recommendations 2025

The following new recommendations are proposed:

- End the abuse of Law No. 2911 on Meetings and Demonstrations, which is currently being used to restrict the right to peaceful assembly by banning public demonstration and to arbitrarily detain and charge LGBTQIA+ people for participating in public events, or for holding rainbow flags in the public space. Repeal all bans on public assemblies for LGBTQIA+ people.
- Immediately release LGBTQIA+ activists Erkin and Yıldız Tar and cease the crackdown on legitimate CSOs, journalists, and others forming part of democratic checks and balances.

Resources

- Civil Liberties Union for Europe, "Liberties Rule of Law Report 2025"
- European Civic Forum, upcoming 2025 report on civic space
- ILGA-Europe, "Submission to the EC 2025 Rule of Law report"
- Platform for International Cooperation on Undocumented Migrants (PICUM), "Criminalisation of Migration and Solidarity in the EU - 2024 Report"

About Civil Society Europe

Civil Society Europe (CSE) is the coordination of civil society organisations at EU level. Through its membership, CSE unites EU-level membership-based organisations that represent millions of people active in or supported by not-for-profits and civil society organisations across the EU. CSE was created by several civil society organisations as a follow-up to the European Year of Citizens and was established as an international not-for-profit under Belgian law in 2016. Since then, it has become the point of reference for EU institutions on transversal issues concerning civil dialogue and civic space.

Co-funded by the European Union

Co-funded by the EU. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them.