



# ASSESSMENT REPORTS ON CIVIC PARTICIPATION TRENDS AND BARRIERS

Comparative analysis across Bosnia and Herzegovina,  
Montenegro, Serbia, North Macedonia, Albania, Croatia and  
France

ROOT WB · WP2, D2.1



Funded by  
the European Union



**Publisher:** ROOT WB Project Consortium

**On behalf of:** CEDEM – Centre for Democracy and Human Rights  
(WP2 Lead)

**Produced by (Contributors):** CEDEM, LDA Mostar, ALDA, ACT-Center, BCSP, LDA Sisak, EMMK

**Design:** CEDEM, Podgorica

**Translated into:**

English, Montenegrin, Serbian, Macedonian, Bosnian, Croatian, Albanian and French.

**Year:** 2026.

Funded by the European Union. 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 the granting authority can be held responsible for them.

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Macedonia, Albania, Croatia and France

Regional Ownership of Our Tomorrow: Citizens and Civil Society Growing EU Values  
in the Western Balkans

**ROOT WB · Work Package 2 (WP2), Deliverable 2.1 (D2.1)**

WP2 Lead: CEDEM — Centre for Democracy and Human Rights (Montenegro)

Project coordinator: LDA Mostar (Bosnia and Herzegovina)

**July 2026.**

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## INTRODUCTION

This Assessment reports on civic participation trends and barriers is produced under **Regional Ownership of Our Tomorrow: Citizens and Civil Society Growing EU Values in the Western Balkans** — hereafter referred to as ROOT WB. ROOT WB is a transnational project funded by the European Union under the **CERV Programme (Citizens, Equality, Rights and Values)**, covering the period 1<sup>st</sup> January 2026 to 31<sup>st</sup> December 2027. The CERV Programme is the European Union's primary instrument for promoting EU values — including democracy, rule of law, fundamental rights, equality, and civic participation — through civil society support, capacity building, and transnational cooperation. ROOT WB is funded under CERV's strand dedicated to civic engagement and democratic participation. The project brings together civil society organisations, citizens, youth, and local authorities from seven countries — five Western Balkans states and two EU member state — to foster inclusive dialogue, participatory governance, cross-border cooperation and the strengthening of EU democratic values at local and regional level. Through a combination of capacity building, participatory labs, civic campaigns, policy dialogue, and advocacy actions, the project empowers citizens to actively engage in democratic processes and contribute to shaping policies that affect their everyday lives, with special attention to youth, women, and marginalised groups. The aim of ROOT WB is **to strengthen the enabling environment for civil society in Western Balkan countries** by enhancing civic engagement, supporting democratic participation and promoting EU values. The project pursues five specific objectives:

- **SO1:** Promote active citizenship and civic engagement, particularly among youth, women, and underrepresented groups at local, national, and regional levels.
- **SO2:** Enhance CSO capacities to defend civic space, advocate reforms, and represent citizens' rights.
- **SO3:** Facilitate regional cooperation and exchange of best practices between CSOs, local authorities, and EU partners to foster cross-border civic alliances.
- **SO4:** Improve public understanding of EU values, rights, and institutions, in line with the EU Charter of Fundamental Rights.
- **SO5:** Establish participatory policy-making mechanisms to integrate citizen input into both local governance and EU-related processes.

ROOT WB is led by **LDA Mostar** (Local Democracy Agency Mostar, Bosnia and Herzegovina), which holds overall responsibility for project coordination, management and quality assurance. The project consortium comprises eight partner organisations across seven countries: LDA Mostar (Bosnia and Herzegovina), NALAS (France), ALDA (France), LDA Sisak (Croatia), CEDEM (Montenegro), ACT-Center (Albania), BCSP (Serbia), EMMK (North Macedonia). The **Assessment reports on civic participation trends and barriers** constitutes **Work Package 2 (WP2) and Deliverable 2.1. (D2.1)** of the ROOT WB project and represents its analytical and evidence-generating foundation. Positioned at the early stage of project implementation, WP2 provides the empirical basis on which all subsequent work packages are built. Its findings inform project activities related to capacity building, participatory labs, civic campaigns, policy dialogue, and advocacy, ensuring that all interventions are grounded in reliable data and reflect the acute and realistic needs of civil society organisations (CSOs) and citizens across the partner countries. The Western Balkans region **currently lacks such a systematic regional analysis** — one that combines country-specifics with comparative analysis and applies a unified methodology across diverse national contexts. By filling this gap, the Assessment reports on civic participation trends and barriers contributes not only to the internal evidence base of the ROOT WB project, but to the broader knowledge infrastructure available to civil society, donors, policy-makers, and international institutions. The Assessment reports on civic participation trends and barriers pursues six specific objectives:

- **Assess the enabling environment:** Examine the legal, policy, social, and political conditions in which CSOs operate, focusing on factors that enable or constrain civic engagement at national and sub-national levels.
- **Identify capacity gaps:** Map the institutional, operational, and resource-related capacity gaps within CSOs, including their ability to engage in policy processes and facilitate citizen participation.
- **Analyse civic participation trends:** Document the levels, forms, and patterns of citizen engagement in public and democratic processes, including differences across demographic groups and over time.
- **Map barriers to participation:** Identify the main legal, administrative, political, financial, and societal obstacles that limit effective participation by both CSOs and citizens.
- **Systematise existing evidence:** Compile and critically review existing data, research, and reports related to civil society and civic engagement in each country, creating a reliable evidence base for project activities.
- **Provide actionable recommendations:** Develop evidence-based, context-specific recommendations aimed at strengthening CSO capacities, improving the enabling environment, and enhancing citizen participation at both country and regional levels.

The Assessment reports on civic participation trends and barriers analyses four dimensions: the enabling environment for CSOs; organisational capacities and needs; civic participation trends; and barriers to engagement. Together, they provide a comprehensive picture of civil society across the partner countries. The assessment is addressed to civil society organisations, public institutions at all levels of governance, EU bodies and international institutions, donors, researchers and policy analysts working on democratic governance in the region. The implementation of the Assessment reports on civic participation trends and barriers is led by **CEDEM – Centre for Democracy and Human Rights (Montenegro)**. CEDEM is responsible for the overall design of the methodology, coordination of data collection across all partner countries, quality assurance of partner contributions, synthesis of country-level findings into the comparative regional analysis, and production of the final Assessment reports on civic participation trends and barriers report. The Assessment reports on civic participation trends and barriers applies a **mixed-methods approach** that combines qualitative and quantitative data, integrating statistical trends with stakeholder perspectives to produce a comprehensive and contextually grounded analysis. Data collection is structured around three complementary components: **desk research, key informant interviews (KIIs) and an online survey targeting CSOs**. All three components are implemented across all partner countries using unified tools.

**Desk research** provides the initial analytical foundation for the Assessment reports on civic participation trends and barriers in each country and it was conducted using a standardised country template. It includes a systematic review of:

- Legal and policy frameworks governing civil society organisations, freedom of association, public participation, and civic engagement.
- National and international reports, assessments, and monitoring outputs related to civil society, civic space, and democratic governance — including European Commission progress reports, CIVICUS Monitor assessments, BCSDN Monitoring Matrix reports, and country-specific publications by civil society and research organisations.
- Relevant strategic documents, government strategies, and action plans related to civil society development and civic participation.
- Existing quantitative data on civic participation levels, public trust in institutions, CSO financial sustainability, and related indicators.

**Key informant interviews (KIIs)** complement the desk research by providing deeper qualitative insights that written sources cannot fully capture: the lived experience of civil society practitioners,

the institutional dynamics of CSO–government relations as experienced in practice, and the contextual knowledge of actors embedded in local and national civic ecosystems. KIIs are conducted in each partner country using a common set of guiding questions. A total of **24 KIIs** were conducted across the seven partner countries for this assessment:

| Country                | KIIs conducted | Responsible partner |
|------------------------|----------------|---------------------|
| Montenegro             | 4              | CEDEM               |
| Bosnia and Herzegovina | 4              | LDA Mostar          |
| Serbia                 | 3              | BCSP                |
| North Macedonia        | 3              | EMMK                |
| Albania                | 3              | ACT-Center          |
| Croatia                | 4              | LDA Sisak           |
| France                 | 3              | ALDA                |

The **online survey** is designed to collect quantitative data on the capacities, needs, and perceptions of CSOs operating in each partner country. It targets a broad range of organisations in each country, with a minimum target of **40 responses per country**. The survey focuses on four thematic areas: organisational capacities and internal structures, access to funding and financial sustainability, participation in policy processes and relationships with public institutions and perceived barriers to civic engagement and CSO effectiveness. The survey was implemented using a common online questionnaire, allowing for the collection of comparable quantitative data across countries. Survey data were analysed using descriptive statistical methods, with findings presented at both country and regional levels. The survey results complement the qualitative findings from desk research and KIIs. All combined forms descriptive statistical analysis.

This report is a **joint output of the ROOT WB Project Consortium**, based on empirical data and contextual inputs collectively produced by partner organisations across seven countries through coordinated desk research, key informant interviews and survey implementation, under the methodological leadership of CEDEM.



## COUNTRY CONTEXT: MONTENEGRO

### 1. Main Political and Social Developments Affecting Civil Society and Civic Participation

Montenegro has experienced significant political turbulence since 2020, which has had an impact on civil society and the broader civic environment. The fall of the long-ruling Democratic Party of Socialists (DPS) after three decades in power, following the 2020 parliamentary elections, triggered a prolonged period of government instability. Between 2020 and 2024, the country went through four different governments, with deep political polarisation along ideological, identity-based, and geopolitical lines. This instability has created an unpredictable environment for civil society, making long-term planning difficult and increasing the vulnerability of CSOs to political instrumentalisation.<sup>1</sup> The **EU's 2025 Progress Report on Montenegro** notes that democratic institutions “remain fragile and vulnerable to political crises and potential institutional blockages.” A concrete illustration emerged at the end of 2024, when Parliament unilaterally declared the retirement of a Constitutional Court judge — raising serious questions about the separation of powers and judicial independence. Despite these turbulences, the ruling coalition continued to function and deliver reform results, with EU integration remaining the declared overarching priority.

A defining feature of the period is the intensification of identity-based and ethno-religious divisions, which have increasingly permeated public discourse. Disputes over the Law on Religious Communities (2019–2020) mobilised large segments of society, with the Serbian Orthodox Church playing an active political role. The 2025 **CEDEM Political Opinion Survey** (N=1,006, representative sample, September–October 2025) documents the depth of these polarisation dynamics, showing that citizens remain sharply divided along political, national, and religious lines on fundamental questions of state direction, foreign policy orientation, and historical memory. Notably, the survey finds significant divergence in assessments of Montenegro's direction, government performance, and geopolitical alignment, reflecting a society in which civic identity is increasingly filtered through political affiliation.<sup>2</sup>

For civil society, particularly consequential is the trend of public discrediting of the NGO sector by prominent public officials. Interviewees consistently identified the past three years as a period of regression rather than progress for civil society:

*“Over the past three years, civil society has operated in an increasingly complex environment marked by political instability, frequent institutional changes, declining trust in decision-making processes, and a growing dependence on short-term project funding. Global political shifts — including changing priorities among international donors and the new political dynamic following the new administration in the United States — add to the sense of uncertainty. For these reasons we would describe this change as regression rather than progress, particularly in terms of sustainability, security of work, and space for the critical engagement of civil society.”*

KII, MOACG, 1 June 2026.

The EU's 2025 Report explicitly notes “instances of public criticism and accusations by prominent public officials that discredit the work and reputation of human rights defenders.” The Centre for Civic Education (CGO), in its statement for World NGO Day (February 2026), characterises this as part of a pattern in which the space for autonomous civil society action is being progressively narrowed through

<sup>1</sup>European Commission, Montenegro Report 2025, SWD(2025) 754 final/2, 4.11.2025  
<https://enlargement.ec.europa.eu/document/download/montenegro-report-2025>

<sup>2</sup>CEDEM, Political and Public Opinion Survey, September–October 2025 (N=1,006, representative sample)  
<https://cedem.me>

“institutional pressures, selective support, and the absence of guarantees of independence.”<sup>3</sup> Civil society practitioners describe the situation in strikingly consistent terms across organisational types and regions:

*“The current environment for civil society work in Montenegro can be described as uncertain, financially unsustainable, and often discouraging — marked by pronounced social and political instability, insufficient recognition of the work of civil society organisations, and an increasingly hostile attitude towards actors who critically point to problems in the system.”*

KII, Network for Youth Activism of Montenegro (MOACG), 1 June 2026.

Hate speech and online disinformation have emerged as particularly pressing concerns. A 2024 IPSOS survey found that **93% of Montenegrin citizens** had noticed hate speech in their surroundings, while a separate December 2024 IPSOS survey found that **35% of citizens do not verify the accuracy of information** they encounter online. UN agencies have explicitly called on Montenegro to strengthen its response to hate speech, noting its disproportionate impact on women, LGBTI persons, Roma, religious minorities, and civil society activists.<sup>45</sup>

Youth disengagement and emigration remain structural challenges. The **Youth Strategy 2023–2027** — developed through a participatory process involving over 1,005 young people (ages 15–30) across all three regions, and supported by UNDP and UNICEF — explicitly identifies “brain circulation” rather than mere emigration prevention as a strategic priority. The Strategy acknowledges that institutional instability and the repeated shifting of youth policy competence between ministries, combined with insufficient human resources in the responsible ministry, “almost prevent adequate implementation and coordination of youth policy.” This demographic and institutional dynamic weakens the pipeline of future civic activists and erodes the social base for participatory democracy.<sup>6</sup>

A critical and underanalysed dimension of the current civic landscape is the deep interdependence between civil society and the state institutional apparatus. Following the 2020 political transition, approximately half of the professional staff and some ministerial positions in the new government were **filled by individuals who came from the civil society sector**. This reflects the depth of policy expertise accumulated by Montenegrin CSOs over three decades and their recognised credibility as independent analysts and advocates. Civil society organisations participate systematically in government working groups, and approximately half of the reports Montenegro is required to submit in the EU accession process are based on research and monitoring conducted by the civil society sector. This functional integration is a structural strength, but also a vulnerability: it creates pressure on CSOs to moderate their critical advocacy in order to preserve institutional access, and blurs the boundaries between civil society oversight and governmental co-optation.

## 2. Legal, Policy and Institutional Framework for CSOs

### Formal Framework

<sup>3</sup>CGO, Statement for World NGO Day, 26 February 2026 <https://cgo-cce.org/2026/02/26/povjerenje-gradjana-ne-prati-odnos-vlasti-prema-nvo-sektoru/>

<sup>4</sup>IPSOS for United Nations Montenegro, Nationally representative survey on hate speech (December 2024): 93% of respondents had noticed hate speech around them; 35% do not verify information <https://montenegro.un.org/en/296462-montenegro-must-combat-hate-speech-say-un-agencies>

<sup>5</sup>UN Agencies, Montenegro Must Combat Hate Speech <https://montenegro.un.org/en/296462-montenegro-must-combat-hate-speech-say-un-agencies>

<sup>6</sup>Ministry of Sports and Youth / UNDP / UNICEF, Youth Strategy 2023–2027 with Action Plan 2023–2024

Montenegro has a relatively developed formal legal framework for civil society. The new draft **Law on Non-Governmental Organisations** represents the most significant legislative development for the sector in recent years. The draft introduces several positive elements: it increases the minimum mandatory budget allocation for CSO funding from 0.3% to 0.4% of the current annual budget, introduces dedicated funds for organisations working with persons with disabilities (minimum 0.1% of the current budget), and provides for co-financing of EU and internationally funded projects (minimum 0.1%). The draft also clarifies registration procedures and formally anchors the Council for Cooperation between the Government and NGOs in law rather than a government decision — addressing a structural vulnerability identified across multiple Western Balkans contexts.<sup>7</sup> Beyond the NVO Law, the institutional architecture includes the Government Office for Cooperation with NGOs, the Council for Cooperation between the Government and NGOs, and the Strategy for Cooperation between State Administration Bodies and NGOs 2022–2026. Montenegro has adopted strategies related to civil society development, and CSOs are formally included in consultation processes related to EU accession. The EU's 2025 Common Position on Chapter 23 acknowledges overall progress but identifies persistent implementation gaps in judicial independence, anti-corruption track records, and the protection of fundamental rights.<sup>8</sup>

### Practice: Enabling or Restrictive?

In practice, the framework is inconsistently enabling, and the draft Law on Non-Governmental Organisations **carries risks alongside its improvements**. CGO raises the concern that “key funding criteria and procedures remain left to secondary legislation,” replacing legal certainty with the discretionary will of the executive and opening space for arbitrary interpretations. Furthermore, the draft introduces enhanced supervisory and control mechanisms which, under the guise of compliance with MONEYVAL recommendations, risk “pressuring, discouraging, and intimidating” organisations — particularly smaller ones. The provision for automatic deletion from the register for administrative failures, combined with intensified inspection mechanisms, could have disproportionate impact on smaller organisations that are most rooted in local communities.<sup>9</sup>

A further concern in the draft version of the law relates to **Article 12**, which sets **out restrictions on who may serve as a founder or member of a non-governmental organisation**. In addition to standard restrictions related to terrorism financing and money laundering, the article introduces a prohibition on founding or joining organisations for persons convicted of criminal offences related to domestic and gender-based violence, when the organisation is founded with aims that involve direct contact with victims of such violence. While the protective intent behind this provision is clear, the formulation is sufficiently broad to raise concerns about legal certainty: the phrase “direct contact with victims” is undefined, leaving wide discretion to authorities in determining which organisations fall within its scope. Civil society organisations working on gender equality, anti-violence programmes, or victim support could face uncertainty about their legal status, with chilling effects on the recruitment of founders and members with any prior legal record — regardless of the nature or relevance of the offence to the organisation's actual work.

**Articles 27 and 31**, which govern **the requirements for authorised representatives of associations and foundations respectively, replicate the restrictions introduced in Article 12** and add a further constraint specific to foundations: the representative must have residence or habitual residence in Montenegro. This residency requirement, applied to foundations but not to associations, creates an unequal legal framework within the sector and may create operational difficulties for organisations

<sup>7</sup> Draft Law on Non-Governmental Organisations, Montenegro (July 2025) <https://www.gov.me/dokumenta/c6973374-293a-4fc4-9fc4-5de40518eab0>

<sup>8</sup> European Commission, Montenegro Report 2025 <https://enlargement.ec.europa.eu/document/download/montenegro-report-2025>

<sup>9</sup> CGO, Statement for World NGO Day, 26 February 2026 <https://cgo-cce.org/2026/02/26/povjerenje-gradjana-ne-prati-odnos-vlasti-prema-nvo-sektoru/>

with international governance structures, diaspora-founded foundations, or organisations receiving operational support from abroad. It also introduces a new formal barrier that did not appear in earlier draft versions and that has not, to this organisation's knowledge, been subject to specific public justification or impact assessment.

**Article 33**, on internal supervision of associations, introduces **a provision requiring that when a member formally objects in writing to a statutory violation, the competent body of the association must respond within 30 days**, failing which the member may bring a court claim. While the intent — to strengthen members' rights and governance accountability — is legitimate, the practical consequence for small, volunteer-run organisations is significant. Many smaller community-rooted CSOs lack the administrative infrastructure to process formal written complaints and respond substantively within 30 days. For organisations with infrequent governance meetings, seasonal activities, or no paid staff, this provision creates a legal exposure that is disproportionate to any governance risk it addresses. Combined with the provisions on automatic deletion from the register for administrative failures, this creates a pattern of regulatory obligations calibrated to professionalised organisations rather than to the grassroots reality of much of Montenegro's civil society sector.

The representative of CRNVO captures the overall dynamic concisely:

*“Generally open, but not encouraging, and without significant measures for long-term improvement. We are still waiting for the Law on NGOs; laws are applied unevenly — case by case and place by place.”*

KII, CRNVO (Network of Non-Governmental Organisations of Montenegro), 1 June 2026.

The draft law was also published, as CGO notes, “without adequate justification, which undermined the transparency of the legislative process” — a symptom of the broader pattern identified in the EU's 2025 Report: formal frameworks exist but are circumvented or selectively applied. The Report explicitly states that “civil society partnership in policymaking is recognised, but the practical implementation of this principle by the government is inadequate.” A parallel legislative development compounds this concern. A new **Law on Financial Operations and Accounting for Non-profit Organisations** is currently in early drafting, with a working group established and a consultative process underway.<sup>10</sup> CEDEM participated in the June 2025 consultation and advocated for a **proportional model** of financial and accounting obligations — one calibrated to the revenue level and administrative capacity of each organisation rather than imposing uniform requirements across the sector, which is a model designed in that draft. The key risk identified is that overly restrictive or disproportionate accounting requirements could significantly increase the administrative burden on smaller organisations, reducing space for civic initiative precisely among the groups least equipped to absorb additional compliance costs. The quality of the eventual law will depend heavily on whether open and constructive consultation remains central to the drafting process and so far the working group only met once in a period of full year. **The Volunteering Law** represents an additional structural problem. As the EU's 2025 Report notes, it treats volunteering more as a form of employment than as a civic activity, which discourages the development of a volunteering culture and weakens civil society's ability to engage citizens on a non-paid basis.<sup>11</sup>

### Cooperation Between CSOs and Public Institutions

**The Council for Cooperation between the Government and NGOs** did not function from October 2021 until late 2025 — nearly four years of paralysis in the main formal mechanism for structured

<sup>10</sup> Law on Financial Operations and Accounting for Non-profit Organisations

<https://www.cedem.me/vijesti/cedem-ucestvovao-na-konsultativnom-sastanku-o-izradi-zakona-o-finansijskom-poslovanju-i-racunovodstvu-neprofitnih-organizacija/>

<sup>11</sup> European Commission, Montenegro Report 2025

<https://enlargement.ec.europa.eu/document/download/montenegro-report-2025>

government–civil society dialogue. According to the EU’s 2025 Report, the Council’s reactivation was expected only by the end of 2025, with a composition of 12 representatives of state bodies and 12 from the NGO sector. This extended institutional gap directly constrained the sector’s ability to influence policy, flag concerns about the enabling environment, and hold the government accountable to its own commitments.<sup>12</sup>

*“In practice, the relationship between civil society and state institutions is discouraging and inconsistent, and depends heavily on the specific institution, the political moment, and the individuals leading the processes. Civil society is often treated as a technical implementer of activities or a formal participant in consultations, while its critical function is frequently perceived as a nuisance rather than a contribution to democratic oversight and the improvement of public policy.”*

KII, MOACG, 1 June 2026.

Particularly significant is the **documented exclusion of CSOs from the Reform Agenda process**. The EU’s 2025 Report explicitly identifies, as a deficiency, that NGOs were not invited to participate in work related to the Reform Agenda despite their calls for inclusion. This exclusion is analytically significant: given that approximately half of the monitoring reports required for Montenegro’s EU accession process are based on civil society research and monitoring, excluding CSOs from the Reform Agenda represents not merely a procedural failure but a substantive governance deficit. A further structural weakness is that not all ministries are required to issue public calls for financing NGO projects, and capacities for strategic planning, monitoring, and evaluation of CSO support remain insufficient. Technical and administrative changes in consultation mechanisms have additionally created barriers to meaningful participation in some periods.

The perspective from a local government institution is notable: even an official within the public sector acknowledges the predominantly formal character of CSO inclusion.

*“The relationship between state institutions and civil society in Montenegro can be summed up in one word: ‘two-way’. There are outstanding examples of good, high-quality cooperation, but the relationship can just as often be described as ineffective, because state institutions usually involve NGOs only formally in the decision-making process.”*

KII, Secretariat for Sport and Youth, Municipality of Nikšić, 2026.

This convergence across civil society and institutional respondents strengthens the analytical finding that the implementation gap is not a matter of perception but of systemic design. CSO engagement with policy processes does occasionally produce concrete results, but interviewees emphasise the conditionality of those results:

*“Civil society takes part in public debates, working groups, consultations, and advisory bodies, but its proposals are not always accepted in substance, nor is there a sufficiently transparent mechanism to explain why particular suggestions were accepted or rejected. Influence is greater when there is strong public pressure, media attention, international support, or when individuals within institutions show openness to cooperation.”*

KII, MOACG, 1 June 2026.

Two concrete examples from interviewees illustrate both the potential and the limits of civil society policy influence in Montenegro. Human Rights Action (HRA) secured the adoption of amendments to the Law on Veterans’ and Disability Protection in February 2025, formally recognising civilian war

<sup>12</sup>European Commission, Montenegro Report 2025  
<https://enlargement.ec.europa.eu/document/download/montenegro-report-2025>



victims and enabling their families to access social protection — the result of years of sustained advocacy. The same organisation reports that amendments to the Law on Internal Affairs and the Law on the National Security Agency were adopted despite its documented objections regarding human rights implications, demonstrating that even well-documented civil society opposition is not sufficient when **political will points in a different direction**.

Montenegro has not been immune to the regional pattern: in October 2024, the coalition "For the future of Montenegro" — comprising pro-Serbian nationalist parties — publicly advocated for the adoption of a "foreign agents" law modelled on Russian legislation. CSOs jointly rejected the initiative as a potential threat to human rights and Montenegro's EU integration, noting that it misrepresented US FARA legislation and that analogous laws across Russia, Hungary, and Georgia had been used exclusively to suppress civic criticism rather than promote democratic governance. The proposal did not advance, but its emergence reflects the same delegitimisation dynamic documented across the wider region and leaves the fear that it will arise again in the future. This idea also affected negatively on the public trust and perception diving into the preexisting notion that CSOs are not working for the national interests.

### Public Perception and Trust

Public trust in CSOs in Montenegro is relatively high. **Center for Civic Education's MNE Puls research** (December 2025) shows that the NGO sector is among the most positively evaluated social actors — rated above the Government of Montenegro. However, as one interviewee notes, this trust is paradoxically fragile in the current political climate:

*"Yes — political and reputational pressures above all. They most often take the form of discrediting activists, negative campaigns, and the creation of an atmosphere in which the critical work of NGOs is portrayed as problematic."*

KII, Human Rights Action (HRA), 25 May 2026.

The CEDEM Political Opinion Survey (September–October 2025) provides broader context: **trust** in political institutions remains comparatively lower, with the judiciary, political parties, and parliament among the least trusted institutions. However, this trust is "fragile and easily undermined in an environment of limited space for action" — particularly when political narratives actively work to delegitimise independent civil society.<sup>1314</sup>

## 3. Strengths and Capacity Gaps of CSOs

### Key Strengths

Montenegro's civil society sector has demonstrated notable resilience and capacity in several areas:

- Deep policy expertise and institutional recognition: Montenegrin CSOs have accumulated three decades of expertise in EU accession monitoring, rule of law, human rights, anti-corruption, and governance reform. This expertise is formally recognised at EU and Council of Europe level, where CSOs have produced credible research and advocacy outputs.
- Strong engagement in EU accession monitoring, with CSOs actively participating in Chapter 23 consultations, shadow reporting, and working groups across multiple policy areas.
- Growing capacity in areas such as hate speech documentation, LGBTI rights advocacy, gender equality, and media monitoring.

<sup>13</sup>CGO / Institut DAMAR, CG Puls, December 2025 – perception of the NGO sector and citizen trust

<sup>14</sup>CEDEM, Political and Public Opinion Survey, September–October 2025 <https://cedem.me>

- Established partnerships with international organisations (Council of Europe, UNDP, UNICEF, EU Delegation) that provide both funding and legitimacy, and have enabled co-production of major research outputs.
- Network of youth organisations and youth services: the Youth Strategy 2023–2027 was developed through a participatory process involving over 1,005 young people and included representatives of the Network for Youth (Mreža za mlade) — the umbrella civil society organisation for youth — as full members of the drafting working group alongside government ministries.

### Key Capacity Gaps

Despite these strengths, CSOs face significant and worsening organisational, financial, and human resource challenges:

- Organisational fragility: most CSOs are small, with limited institutional infrastructure, dependent on a small number of key staff, and weak in succession planning and institutional memory. The talent pipeline paradox — civil society as a source of government personnel — simultaneously depletes the sector's own human capital. These structural weaknesses risk being further compounded by the pending legislative environment: if the draft Law on Non-Governmental Organisations and the new Law on Financial Operations and Accounting for Non-profit Organisations are adopted without adequate proportionality safeguards, smaller CSOs with limited administrative capacity will face disproportionate compliance burdens — potentially triggering functional collapse among community-rooted organisations that currently survive primarily on commitment rather than institutional capacity.
- Project-based existence: the overwhelming majority of CSO activities are funded through short-term project grants. As confirmed by the Hate Speech Mapping Report (2026), all trainings on hate speech were “project-based” — when funding ends, so does the activity. This prevents long-term, systemic programming.<sup>15</sup>

*“For most organisations, sustainability comes down to securing new grants, and there is no incentive to develop other ways of raising funds.”*

KII, CRNVO, 1 June 2026.

- Human resources: recruitment and retention of qualified staff is hampered by low salaries in the sector. Brain drain — a structural challenge in Montenegro generally, as documented in the Youth Strategy — affects CSOs disproportionately. The Youth Strategy identifies the absence of a “brain circulation” model as one of the key strategic deficits in national youth policy, with direct consequences for civil society human capital.
- Geographic concentration: the majority of active organisations are concentrated in Podgorica, with northern and rural areas significantly underrepresented.
- Policy advocacy capacity: while many CSOs produce quality research, their capacity to translate this into sustained, strategic policy advocacy is limited. Engagement with decision-makers often remains episodic rather than ongoing.
- Digital and communication capacity: many CSOs lack the resources and skills to effectively use digital platforms for outreach, fundraising, and campaigning — a gap that compounds vulnerability in an information environment where 35% of citizens do not verify information online.

When asked what distinguishes stronger from weaker organisations, interviewees consistently identified a combination of financial stability, organisational capacity, community trust, and — from an activist perspective — institutional courage:

<sup>15</sup>CEDEM Hate Speech Mapping Report (2026) <https://www.cedem.me/wp-content/uploads/2026/03/HATE-SPEECH-Mapping-Report-final-1.pdf>

*“From an activist’s perspective, strong organisations stand out through the courage to speak publicly about problems, through perseverance, and through their readiness to respond even when under pressure. Weaker organisations often lack the people, support, and resources to sustain such work over the long-term.”*

KII, Human Rights Action (HRA), 25 May 2026.

### Financial Sustainability

Financial sustainability is the central challenge for Montenegrin CSOs. Domestic public funding is limited and politically sensitive: the current 0.3% of the annual budget allocation is widely recognised as inadequate, and the draft NVO Law’s proposed increase to 0.4% (if adopted) would represent an improvement but remains far below what is needed for sector stability. EU funding (through IPA and other instruments) is the primary source for established organisations, but it is project-based, competitive, and administratively demanding. Local philanthropy and corporate social responsibility are underdeveloped as funding streams. The absence of functioning domestic grant-making infrastructure means most CSOs are in a permanent fundraising cycle, with little capacity for unrestricted organisational development.

*“If new funding were to stop tomorrow, we believe only a small number of organisations could keep operating, and mostly only in the short term. Most organisations are project-dependent and have no stable reserves, no income of their own, and no institutional support that would allow them to function over the long-term without new funds.”*

KII, MOACG, 1 June 2026.

## 4. Citizen Participation in Public Life and Decision-Making

Formal mechanisms for civic participation in Montenegro include public consultations on legislation (via e-Uprava), the ePetition portal (which requires 3,000 signatures within 60 days for a petition to be forwarded to the competent ministry), participatory budgeting in some municipalities, and civil society representation in various government working groups and councils. All ministries regularly publish monitoring reports on consultations. Voting turnout at elections remains relatively high by regional standards.<sup>16</sup>

However, the quality and depth of civic participation beyond elections is limited and relies on the CSOs and their projects with deliberative democracy. CEDEM has organised citizens' assemblies five times in Montenegro to date, three of which in partnership with the **European Parliament** — most recently in September 2025, when the Assembly of Montenegro and the European Parliament co-organised a citizens' forum in Podgorica on the theme "Citizens at the Heart of EU Enlargement." Public consultations are frequently criticised as perfunctory — deadlines are short, feedback is rarely incorporated, and the process lacks transparency. The EU’s 2025 Report confirms that “evidence-based policymaking standards, including regulatory impact assessments and public consultations, are not always applied in the planning stage of legislation across all ministries.” Concretely, NGOs were not consulted on numerous laws and important legislative acts, despite the formal obligation to do so.<sup>17</sup> Youth civic engagement is particularly low and is formally identified as a priority problem. The Youth Strategy 2023–2027 identifies youth participation as one of four strategic priorities, noting that young people are insufficiently involved in the creation, implementation, or monitoring of public policies. The representative survey of 1,005 young people (ages 15–30) conducted for the Strategy documented low levels of democratic engagement and participation in formal processes across all

<sup>16</sup>Government of Montenegro, ePetition Portal <https://epeticije.gov.me/>

<sup>17</sup>European Commission, Montenegro Report 2025 <https://enlargement.ec.europa.eu/document/download/montenegro-report-2025>



three regions. The Strategy's second operational objective is explicitly "Creating conditions for young people to be active citizens, included in the creation and implementation of public policies."<sup>18</sup>

Interviewees consistently identify the same root causes behind low citizen participation:

*"Citizens often choose not to participate because they do not believe their involvement can produce real change. The reasons are manifold: low trust in institutions, political polarisation, fear of being labelled, economic insecurity, lack of information, fatigue with public processes, and a sense that decisions have already been made. For young people there is the added problem that their opinion is often sought only formally, while they rarely see a concrete result from their involvement — which discourages activism over time."*

KII, MOACG, 1 June 2026.

On the question of who participates and who is absent, interviewees point to a structural pattern of concentrated engagement:

*"The most active are young people already involved in educational, youth, volunteer, or international programmes, followed by activists, students, part of the professional community, and citizens directly affected by a particular problem. Those who are missing are the most socio-economically vulnerable, citizens from rural and less developed areas, people who do not trust institutions and organisations, and those who — because of existential difficulties — lack the time, the resources, or the sense that their participation can change anything."*

KII, MOACG, 1 June 2026.

The normalisation of hate speech functions as a structural barrier to broad civic participation. Women in politics, LGBTI individuals, Roma, activists, and members of religious minorities report self-censorship, withdrawal from public discourse, and reduced engagement in civic life as a direct consequence of exposure to hate speech and institutional indifference to their protection. This is not a peripheral issue but a mainstream civic space constraint.<sup>19</sup> A notable positive trend is the growing use of digital platforms by civil society for advocacy, awareness campaigns, and citizen mobilisation. However, this is complicated by the simultaneous use of social media as a vector for hate speech and disinformation, creating a contested and sometimes hostile online civic space.

## 5. Main Barriers to Civic Participation

### Legal and Institutional Barriers

- Articles 12, 27, 31, and 33 — whose combined effect creates a regulatory environment calibrated to well-resourced, professionally managed organisations rather than to the **grassroots reality** of most Montenegrin civil society. Broadly formulated restrictions on founders and representatives, a residency requirement for foundation representatives, and a 30-day mandatory response obligation on associations each individually appear modest; taken together, they systematically disadvantage smaller, volunteer-run, and community-rooted organisations — which are precisely those operating in the communities most distant from Podgorica and least likely to have legal or administrative support available.
- Inadequate enforcement of anti-discrimination legislation and hate speech provisions, as documented by CEDEM's analysis of Ombudsperson cases (2019–2025). Legal frameworks exist but are not effectively applied, leaving civic actors without meaningful legal protection.<sup>20</sup>

<sup>18</sup>Ministry of Sports and Youth / UNDP / UNICEF, Youth Strategy 2023–2027 with Action Plan 2023–2024

<sup>19</sup>UN Agencies, Montenegro Must Combat Hate Speech <https://montenegro.un.org/en/296462-montenegro-must-combat-hate-speech-say-un-agencies>

<sup>20</sup>CEDEM Hate Speech Mapping Report (2026)

- Parliamentary immunity for politicians who use hate speech in public discourse, which enables political actors to spread intolerant narratives without legal consequences.
- Near-four-year paralysis of the Council for Cooperation between the Government and NGOs (2021–2025), eliminating the main formal mechanism through which CSOs could influence policy and hold the government accountable to its own commitments.<sup>21</sup>
- Attempted restrictions on the right to public assembly: in July 2025, proposed amendments to the Law on Public Gatherings were withdrawn from parliamentary procedure following criticism from the UN, Council of Europe, EU, and local CSOs — illustrating how institutional pressures can threaten the space for public engagement.
- Risks in the draft NVO Law: the provision for automatic deletion from the register for administrative failures, combined with enhanced inspection mechanisms, may have disproportionate impact on smaller and more vulnerable organisations, potentially discouraging precisely the grassroots civic actors most rooted in local communities.<sup>22</sup>

### Financial Barriers

- Project-based funding cycles that prevent strategic, long-term programming and organisational development.
- Limited access to EU funds for smaller or newly established organisations due to administrative capacity requirements.
- Absence of domestic grant-making and philanthropic culture, creating near-total dependence on international donors.
- High poverty rates constrain citizens' capacity for active participation: the at-risk-of-poverty rate is 20.1%, rising to 40.4% for children under 18 using the AROPE indicator. High youth unemployment and long-term unemployment, with structural disparities between the northern region and the rest of the country, further narrow the space for participation.

### Societal Barriers

- Deeply rooted normalisation of hate speech and intolerance as a cultural and societal phenomenon embedded in primary socialisation, education, and political discourse, creating a hostile environment for civic actors particularly those working on minority rights, gender equality, and LGBTI issues.<sup>23</sup>
- Political polarisation and identity-based divisions that fragment civic space and make cross-community cooperation difficult.
- Delegitimisation campaigns targeting NGOs and activists, labelling them as “foreign mercenaries” or “traitors,” which undermines public trust and discourages civic engagement.
- Low institutional literacy among citizens regarding their rights, available complaint mechanisms, and democratic participation channels.
- Self-censorship among journalists, activists, and public figures exposed to hate speech and online harassment, reducing the diversity of voices in public discourse.
- Structural exclusion of marginalised groups — particularly LGBTI persons, Roma, women, and persons with disabilities — from public life due to institutional passivity and lack of psychosocial support.<sup>24</sup>

## 6. Priority Actions to Strengthen CSOs and Improve Civic Participation

<sup>21</sup>European Commission, Montenegro Report 2025

<https://enlargement.ec.europa.eu/document/download/montenegro-report-2025>

<sup>22</sup>Draft Law on Non-Governmental Organisations, Montenegro (July 2025)

<sup>23</sup>CEDEM Hate Speech Mapping Report (2026)

<sup>24</sup>UN Agencies, Montenegro Must Combat Hate Speech <https://montenegro.un.org/en/296462-montenegro-must-combat-hate-speech-say-un-agencies>

## Legal and Institutional Reforms

- Revise Articles 12, 27, and 31 to narrow and legally define the scope of restrictions on founders, members, and authorised representatives. In particular: the phrase "direct contact with victims" in Article 12 must be given a precise legal definition to prevent arbitrary application; and the basis for disqualification should be limited to offences directly relevant to the organisation's stated purpose and activities. Broad criminal record grounds for exclusion risk creating chilling effects on civil society recruitment and governance that are disproportionate to any legitimate protective aim.
- Remove the residency requirement for authorised representatives of foundations (Article 31) or, at minimum, subject it to a clear justification and impact assessment. The differential treatment of foundations and associations on this point creates unequal legal conditions within the sector without a stated rationale, and disadvantages diaspora-founded or internationally governed organisations.
- Revise Article 33 to introduce a proportionality mechanism calibrated to organisational size and governance capacity. For organisations with fewer than a defined number of members or staff, a longer response deadline or an alternative dispute resolution pathway should be available. A uniform 30-day mandatory response obligation across the entire sector creates legal exposure that is disproportionate for volunteer-run and community-level associations.
- Adopt the new Law on Non-Governmental Organisations with key funding criteria and procedures anchored in the law itself rather than secondary legislation, eliminating arbitrariness in public funding allocation. The law must include clear, transparent, and merit-based criteria that are insulated from political discretion.<sup>25</sup>
- Ensure that the Law on Financial Operations and Accounting for Non-profit Organisations is designed on a proportional model that calibrates financial reporting and accounting obligations to the revenue level and administrative capacity of each organisation.
- Revise the enhanced inspection and control mechanisms in the draft NVO Law to ensure they do not have a disproportionate chilling effect on smaller and more vulnerable organisations. Automatic deletion from the register for administrative failures must be replaced by proportionate and judicially reviewable procedures.
- Legally strengthen the binding force of Ombudsperson recommendations and introduce sanctions for institutional non-compliance, including a parliamentary oversight mechanism for implementation tracking.<sup>26</sup>
- Revise the Volunteering Law to treat volunteering as a civic activity rather than a form of employment, removing structural barriers to the development of a volunteer culture.<sup>27</sup>
- Reform hate speech provisions in the Law on Electronic Media and Criminal Code to explicitly recognise gender-based, homophobic, transphobic, and ethnically motivated hate speech, in line with EU acquis and ECRI recommendations.

The systemic change most frequently requested by interviewees is the transformation of public consultations from procedural formalities into genuine accountability mechanisms:

*"We would change the way institutions conduct public consultations and citizen engagement. Instead of formal, short, and often invisible processes, we need a binding, transparent, and accessible participation system in which citizens and civil society organisations receive clear information, enough time to respond, and an explanation of what happened with their proposals. The key change would be introducing genuine accountability."*

<sup>25</sup>Draft Law on Non-Governmental Organisations, Montenegro (July 2025)

<sup>26</sup>Ombudsperson (Protector of Human Rights and Freedoms) of Montenegro — Recommendations and Opinions (2019–2025)

<sup>27</sup>European Commission, Montenegro Report 2025

<https://enlargement.ec.europa.eu/document/download/montenegro-report-2025>

KII, MOACG, 1 June 2026.

### Capacity Building for CSOs

- Develop multi-year, non-project-based core funding mechanisms for established CSOs to enable institutional development, staff retention, and long-term strategic programming.
- Establish stable and predictable financing for the youth services network: the EU's 2025 Report identifies this as urgent, noting that none of the 11 active youth centres has stable financing. New centres must be established in additional municipalities, with particular priority for the northern region.
- Invest in digital literacy, communication, and advocacy skills for CSO staff, particularly in regions outside Podgorica, to address geographic inequalities and improve capacity to operate in a disinformation-heavy information environment.
- Support CSO networks and coalitions to build collective advocacy capacity and reduce organisational fragmentation.

On intra-sector solidarity, one interviewee makes the case directly:

*“Civil society organisations urgently need to strengthen mutual solidarity and joint action, because they are stronger and more effective when they act together — particularly under pressure or around important societal decisions.”*

KII, Human Rights Action (HRA), 25 May 2026.

### Civic Participation and Education

- Introduce mandatory civic education from primary school level, covering human rights, democratic participation, tolerance, and media literacy as a standalone subject, not optional.
- Ensure full implementation of the Youth Strategy 2023–2027, particularly its second operational objective (youth participation in public policies) and fourth operational objective (strengthening the normative-institutional framework for youth policy). This requires adequate resourcing of the Ministry of Sports and Youth and resolution of the recurring problem of responsibility being shifted between ministries.<sup>28</sup>
- Extend the Youth Guarantee programme to all municipalities: it has been piloted in only three municipalities, while the Strategy envisages coverage across all local self-governments.
- Establish a national cross-sectoral strategy against hate speech with clear responsibilities, timelines, budgets, and evaluation mechanisms, as repeatedly recommended by the EU, ECRI, and UN agencies.

### Support for Vulnerable Groups and Victims

- Establish a national SOS line for victims of hate speech and a network of counselling centres providing psychosocial and legal support.<sup>29</sup>
- Introduce specialised support mechanisms in schools, health centres, and social services for individuals from marginalised groups exposed to discrimination and hate speech.

## 7. Conclusion

The Montenegro context offers four analytically distinctive insights for the ROOT WB project. First, the primary barrier to democratic governance is not the absence of legal frameworks but the absence

<sup>28</sup>Ministry of Sports and Youth / UNDP / UNICEF, Youth Strategy 2023–2027

<sup>29</sup>CEDEM Hate Speech Mapping Report (2026)

of institutional will to implement them — a finding that applies as much to hate speech law as to CSO cooperation mechanisms, and that means the project's advocacy must target institutions, not only civil society capacities. Second, the talent pipeline dynamic requires explicit protection of civil society independence through multi-year core funding, so that organisations whose expertise has become indispensable to the state can maintain critical distance from it. Third, the near-four-year paralysis of the Council for Cooperation demonstrates that cooperation mechanisms without statutory anchoring can be dismantled by a single administrative decision — strengthening the cross-country case for legislative rather than administrative solutions. Finally, civic education and media literacy are not supplementary activities but foundational prerequisites: in an information environment where hate speech is pervasive and online misinformation widespread, meaningful civic participation cannot be built without first addressing the conditions under which citizens receive and evaluate information about public life.

## COUNTRY CONTEXT: BOSNIA AND HERZEGOVINA

### 1. Main Political and Social Developments Affecting Civil Society and Civic Participation

Bosnia and Herzegovina continues to operate within a highly complex political and institutional framework shaped by the legacy of the **Dayton Peace Agreement**, deep political fragmentation, and persistent ethnic polarisation. These structural conditions directly affect democratic governance, civic participation, and the operational environment for civil society organisations (CSOs). Political instability, corruption, and fragmented governance structures across state, entity, cantonal, and municipal levels continue to constrain democratic participation and public trust in institutions.<sup>3031</sup> A key political development was the European Council's decision in March 2024 to open accession negotiations with Bosnia and Herzegovina, which generated renewed momentum for reforms related to the rule of law, transparency, and public participation in policymaking. European institutions emphasised the important role of civil society in supporting reforms and monitoring democratic processes. This was further reinforced by the EU-level endorsement process of Bosnia and Herzegovina's Reform Agenda under the Reform and Growth Facility (2025), which enabled access to performance-based financial support linked to reform implementation.<sup>3233</sup>

Key informant interviews conducted for this assessment reflect a shared sense that the environment has deteriorated rather than improved. Interviewees converge on a characterisation of a sector that is formally open but substantively constrained:

*"CSOs in Bosnia and Herzegovina operate in an increasingly shrinking civic space, with many organisations present but only modest collective influence on policy and decision-making."*

KII, Center for the Promotion of Civil Society (CPCD), 19 May 2026.

*"The environment for CSOs in Bosnia and Herzegovina is formally open, but in substance increasingly constrained by uncertain and shrinking external funding, political control, weak institutions, inconsistent and non-transparent domestic funding, and a reduced media space."*

KII, SMART Center / CPCD, 25 May 2026.

A landmark recent development was the adoption of the **Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029** by the Council of Ministers of Bosnia and Herzegovina in July 2025 — the first comprehensive state-level strategic framework specifically dedicated to strengthening civil society development and participation. The independent expert interviewee assesses this as a positive step while immediately identifying its structural limitation:

*"The preparation and later adoption of the Strategy of the Council of Ministers of BiH for Creating an Enabling Environment for Civil Society Development 2025–2029 represents an important institutional step forward. However, its reach remains limited because it mainly concerns BiH-level institutions, while entity, cantonal and Brčko District levels still lack comparable strategic frameworks — except West-*

<sup>30</sup>Dayton Peace Agreement, Office of the High Representative <https://www.ohr.int/dayton-peace-agreement/>

<sup>31</sup>BCSDN, Civic Space Report 2026: Western Balkans <https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-Western-Balkans-European-Civic-Forum-1-1.pdf>

<sup>32</sup>European Commission, Bosnia and Herzegovina accession process overview [https://enlargement.ec.europa.eu/countries/bosnia-and-herzegovina\\_en](https://enlargement.ec.europa.eu/countries/bosnia-and-herzegovina_en)

<sup>33</sup>EEAS, European Commission approves Bosnia and Herzegovina's Reform Agenda [https://www.eeas.europa.eu/delegations/bosnia-and-herzegovina/commission-approves-bosnia-and-herzegovinas-reform-agenda\\_en](https://www.eeas.europa.eu/delegations/bosnia-and-herzegovina/commission-approves-bosnia-and-herzegovinas-reform-agenda_en)



*Herzegovinian Canton where a draft Strategy has been adopted by the cantonal government.”*

KII, Independent Expert (former Senior Adviser for Civil Society Development, Ministry of Justice of BiH), 29 May 2026.

The Strategy focuses on improving transparency and efficiency of public funding for CSOs, strengthening legal guarantees for CSO participation in policymaking, improving institutional cooperation with civil society, and strengthening organisational capacities and infrastructure. Its adoption is considered one of the priorities within BiH’s EU integration process and followed more than a decade of advocacy by public institutions, civil society organisations, and international actors.<sup>34</sup> However, the Strategy’s translation into suAssessment reports on civic participation trends and barriers tional levels of governance remains highly uneven. Only a very limited number of cantons have taken concrete steps toward formal integration of the Strategy into their own policy frameworks, with the West Herzegovina Canton representing one of the few identifiable examples of initial institutional uptake. In most cantons and local self-government units, the process has not yet begun, reflecting significant disparities in administrative capacity, political will, and institutional prioritisation. As a result, CSOs are increasingly required to engage in additional advocacy to ensure the Strategy is recognised and applied beyond the state level — in many communities facing limited institutional openness to such reforms.<sup>35</sup>

The **political environment** remains characterised by institutional blockages, nationalist rhetoric, weak intergovernmental coordination, and frequent political crises. In late 2024, political tensions escalated following decisions by authorities in Republika Srpska to obstruct state-level EU reform processes, further demonstrating the fragility of institutional cooperation and democratic governance. Additionally, initiatives and public debates around restrictive “foreign agent” legislation emerged in Republika Srpska, raising concerns over shrinking civic space and increased pressure on independent CSOs and media. One interviewee documents the broader pattern of restrictive pressures:

*“Over the past three years, the most significant change has been the growing pressure on civil society through restrictive legal and political narratives, including public debates around ‘foreign agent’ legislation and new rules on CSO financing in the Federation of BiH. At the same time, CSOs and independent media have faced reduced capacities and fewer available funding opportunities due to the withdrawal or shrinking support of foreign donors. On the positive side, there has been a visible rise in environmental activism, with activists increasingly using legal action, stronger community presence and more strategic forms of advocacy, which has already produced tangible results in some local struggles.”*

KII, CPCD, 19 May 2026.

The Constitutional Court of Bosnia and Herzegovina **subsequently annulled the Law on the Special Register and Publicity of the Work of Non-Profit Organisations in Republika Srpska, declaring it unconstitutional ab initio** – illustrating both the persistence of restrictive political narratives and the role of judicial institutions in safeguarding civil liberties.<sup>3637</sup> Civil society organisations increasingly play

<sup>34</sup>Council of Ministers of BiH, Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029 and Action Plan 2025–2026 <https://mpr.gov.ba/hr/strategija-vm-bih-za-stvaranje-poticajnog-okruzenja-za-razvoj-civilnog-drustva-2025-2029>

<sup>35</sup>Council of Ministers of BiH, Action Plan 2025–2026 for the Strategy <https://www.mpr.gov.ba/bs/strategija-vm-bih-za-stvaranje-poticajnog-okruzenja-za-razvoj-civilnog-drustva-2025-2029>

<sup>36</sup>OHR, 68th Report of the High Representative to the UN Secretary-General <https://www.ohr.int/68th-report-of-the-high-representative-for-implementation-of-the-peace-agreement-on-bosnia-and-herzegovina-to-the-secretary-general-of-the-un/>

<sup>37</sup>Media.ba, Constitutional Court of BiH annuls the ‘Foreign Agents’ Law <https://www.media.ba/bs/vijesti-i-dogadaji-vijesti-ustavni-sud-bih-neustavnim-proglasio-zakon-o-stranim-agentima>



a compensatory role in addressing gaps left by weak or politically constrained institutions. CSOs in Bosnia and Herzegovina are particularly active in environmental protection, youth engagement, social inclusion, anti-corruption advocacy, human rights, women's rights, intercultural dialogue, and local community development. Grassroots environmental movements have become one of the most visible and effective forms of civic mobilisation, particularly in relation to hydropower projects, pollution, waste management, and unsustainable development.<sup>38</sup> The country also faces significant demographic and social challenges, including youth emigration, declining trust in institutions, and growing social pessimism. Climate-related disasters, including severe floods in 2024, which resulted in devastating human losses and significant property damage, further highlighted both the importance of community solidarity and the structural weaknesses of public institutions in emergency response — with CSOs and informal volunteer groups providing immediate support in affected communities.<sup>39,40</sup>

## 2. Legal, Policy and Institutional Framework for CSOs

### Formal Framework

The legal framework governing civil society organisations in Bosnia and Herzegovina is formally aligned with European democratic standards, particularly regarding freedom of association, assembly, and expression. CSOs are able to register and operate under three separate laws: the Law on Associations and Foundations of Bosnia and Herzegovina at the state level, the Law on Associations and Foundations of the Federation of BiH, and the Law on Associations and Foundations of Republika Srpska. In principle, the regulatory framework reflects key elements of the EU acquis in the area of fundamental rights and civil society freedoms.<sup>41,42,43</sup> Bosnia and Herzegovina does not have a unified and comprehensive centralised database of civil society organisations at the state level. Instead, CSO registration data are maintained across multiple administrative registers at state, entity, and cantonal levels, with limited harmonisation and interoperability between systems. Data management practices vary across jurisdictions, and there is no fully integrated mechanism for regular consolidation and standardised updating of CSO data. This fragmentation reduces overall transparency, complicates access to reliable sector-wide information, and limits evidence-based strategic planning for both public institutions and civil society stakeholders, including within EU-related policy processes.

The trajectory of the "foreign agents" law in Republika Srpska extends beyond the Constitutional Court of Bosnia and Herzegovina's annulment. In January 2026, the Constitutional Court of Republika Srpska suspended its own constitutional review proceedings on the law, following a request submitted by the Helsinki Citizens' Assembly Banja Luka, CAPITAL, and a civil society representative from Laktaši — noting that the law had already ceased to be in force following the earlier ruling of the Constitutional Court of Bosnia and Herzegovina. While this suspension is a positive development, the European Civic Forum's 2026 assessment emphasises that if reinstated, the law would significantly expand state control over civil society and contribute to a hostile environment for independent organisations. The sequence — adoption, annulment, suspended review — illustrates a dynamic in

<sup>38</sup>The Role of Civil Society in Environmental Governance in Bosnia and Herzegovina (2024)

<https://mapub.org/ojs/index.php/mapss/article/view/141>

<sup>39</sup>UNDP, SCORE 2025 Executive Summary – youth emigration data for BiH

[https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score\\_2025-executive\\_summary.pdf](https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score_2025-executive_summary.pdf)

<sup>40</sup>IOM Bosnia and Herzegovina, 2024 Flood and Landslide Response Situation Report

<https://bih.iom.int/sites/g/files/tmzbd11076/files/documents/2025-02/2024-flood-and-landslide-response-situation-report-20-feb-1.pdf>

<sup>41</sup>Law on Associations and Foundations of Bosnia and Herzegovina

<https://www.parlament.ba/law/DownloadDocument?lawDocumentId=1eeb89b9-6114-4a5e-9e45-e2bf82911f88&langTag=hr>

<sup>42</sup>Law on Associations and Foundations of the Federation of Bosnia and Herzegovina <https://www.sufbih.ba/wp-content/uploads/2021/04/Zakon-o-udruzenjima-i-fondacijama-FBiH.pdf>

<sup>43</sup>Law on Associations and Foundations of Republika Srpska <https://www.paragraf.ba/propisi/republika-srpska/zakon-o-udruzenjima-i-fondacijama-republike-srpske.html>

which legislative threats to civic space can be defeated through constitutional and advocacy mechanisms, but only with sustained civil society effort and at significant institutional cost.<sup>44</sup>

### Practice: Enabling or Restrictive?

In practice, the framework is inconsistently enabling. The main challenges identified in EU progress assessments relate not to the absence of legal provisions, but to their inconsistent application, limited institutional capacity, and weak enforcement of participatory governance mechanisms. BiH's highly decentralised governance structure means that legislation and administrative practices related to CSO registration, public funding, and participation mechanisms **vary significantly across jurisdictions**, creating legal uncertainty and unequal operating conditions: CSOs in Republika Srpska, the Federation of BiH, Brčko District, and different cantons of FBiH in practice follow different administrative procedures and face different eligibility criteria for public support.<sup>45,46</sup> From an EU integration perspective, the legal basis is considered broadly compatible with European standards, but implementation gaps remain the defining challenge. The European Commission's approval of the Reform Agenda in November 2025 under the Reform and Growth Facility signals international recognition of reform progress, while simultaneously exposing the persistent difficulty of political coordination across governance levels.<sup>47</sup>

Interviewees characterise the quality of implementation in strikingly similar terms:

*"Although an adequate legal framework exists, the role of civil society — which in Bosnia and Herzegovina is organised in the above-mentioned manner and faces the described challenges — is in practice largely formal and insufficient in decision-making processes."*

KII, IREI, 23 May 2026.

*"Participation is most often formal. CSOs can sometimes influence policies when they are well organised, equipped with data, supported by the public and the media, and connected with international allies. However, systemically speaking, consultations are often conducted late, superficially, and without any real obligation for institutions to take CSO proposals into account."*

KII, SMART Center / CPCD, 25 May 2026.

### Cooperation Between CSOs and Public Institutions

Institutional mechanisms for civic participation — including public consultations, advisory bodies, youth councils, and participatory initiatives at local level — formally exist across different levels of government. However, their impact remains limited, as they are often applied inconsistently and without clear obligations for authorities to integrate CSO input into final decisions. Public consultations are frequently organised at late stages of policymaking, limiting their ability to influence

<sup>44</sup>BCSDN / European Civic Forum, Civic Space Report 2026: Western Balkans: <https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-Western-Balkans-European-Civic-Forum-1-1.pdf>

<sup>45</sup>European Commission, Bosnia and Herzegovina Report 2024 [https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024\\_en](https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024_en)

<sup>46</sup>European Commission, Bosnia and Herzegovina Report 2025 [https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2025\\_en](https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2025_en)

<sup>47</sup>European Commission Reform and Growth Facility for the Western Balkans [https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/reform-and-growth-facility-western-balkans\\_en](https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/reform-and-growth-facility-western-balkans_en)

substantive outcomes and reinforcing a perception of formal compliance rather than meaningful participation.<sup>4849</sup>

*“In practice, the relationship between CSOs and public institutions is largely inadequate and often instrumental. CSOs are frequently treated as a decorative element in the 'democratic' arrangements presented towards the EU, rather than as partners with real knowledge, legitimacy and potential to contribute to better policies and a better Bosnia and Herzegovina. Cooperation is somewhat better at lower levels of government, but even there CSOs are often seen mainly as service providers or as a substitute for institutional inaction, rather than as equal partners in joint problem-solving.”*

KII, CPCD, 19 May 2026.

Civil society organisations are still frequently perceived by public institutions primarily as service providers or project implementers rather than as policy partners. This limits their strategic role in policy design and reduces opportunities for meaningful institutional dialogue. Cooperation is particularly uneven at the local level, where quality and continuity depend heavily on political leadership, administrative capacity, and whether external project support is available. The **ELOGE (European Label of Governance Excellence) self-assessments** conducted in 12 local self-government units in 2022 and 2023 demonstrate that municipalities increasingly recognise the importance of participatory governance standards, but institutionalisation remains fragmented.<sup>50</sup>

*“In practice, the relationship is selective, personalised, and dependent on the institution, the level of government, the topic, and often on personal relations between individuals on both sides. When a CSO provides a service or does not challenge the power and accountability of officeholders, cooperation is possible. When it seeks accountability, transparency, or a change in the rules of the game, the relationship often becomes defensive, formal, or openly hostile.”*

KII, SMART Center / CPCD, 25 May 2026.

Concrete examples from the interviews illustrate both the potential and the limits of civil society influence. The CPCD successfully mobilised more than 100 small CSOs when a 2024 minimum wage increase in the Federation of BiH created pressure on CSOs as employers without including them in support measures; after institutional and public pressure, the financial assistance framework was broadened. Conversely, the criminalisation of defamation in Republika Srpska was adopted despite “strong warnings from civil society, media actors and international organisations.” Environmental organisations have in several cases managed to stop or slow harmful small hydropower projects. The independent expert additionally cites citizens’ assemblies in Mostar and Sarajevo as examples of meaningful participation when institutional willingness is present. The ELOGE self-assessments demonstrate that municipalities increasingly recognise the importance of participatory governance standards, but quality, continuity and institutionalisation of mechanisms still vary significantly across municipalities and largely depend on political leadership and external project support.<sup>51</sup>

<sup>48</sup>Analysis of the current situation and joint participation of the government and civil society sectors in BiH and the region in the EU integration process <https://irei.ba/en/analysis-of-the-current-situation-and-joint-participation-of-the-government-and-civil-society-sectors-in-bih-and-the-region-in-the-eu-integration-process/>

<sup>49</sup>Policy brief: Strengthening joint action of the government and civil sector in the EU Pre-Accession process of BiH <https://irei.ba/en/policy-brief-strengthening-joint-action-of-the-government-and-civil-sector-in-the-eu-pre-accession-process-of-bih/>

<sup>50</sup>LDA Mostar, ELOGE self-assessments in local self-governance in BiH 2022–2023 [https://www.link4cooperation.ba/wp-content/uploads/2023/12/WEB-ELOGE\\_engleski\\_FINAL1.pdf](https://www.link4cooperation.ba/wp-content/uploads/2023/12/WEB-ELOGE_engleski_FINAL1.pdf)

<sup>51</sup>LDA Mostar, ELOGE self-assessments in 12 local self-government units 2022–2023 [https://www.link4cooperation.ba/wp-content/uploads/2023/12/WEB-ELOGE\\_engleski\\_FINAL1.pdf](https://www.link4cooperation.ba/wp-content/uploads/2023/12/WEB-ELOGE_engleski_FINAL1.pdf)

## Public Perception and Trust

Public trust in CSOs is generally higher than trust in political institutions, particularly for organisations engaged in community work, humanitarian assistance, environmental protection, and social services. However, perceptions of the sector are occasionally affected by donor dependency, limited transparency among some actors, and uneven visibility of long-term impact. The **Balkan Barometer** consistently documents low trust in core state institutions across BiH, creating an environment of generalised institutional scepticism that intermittently affects civil society as well.<sup>5253</sup>

*“Reputational pressure is also present through narratives that portray CSOs as foreign-controlled, politically biased or disconnected from citizens.”*

KII, Independent Expert (former Senior Adviser for Civil Society Development, Ministry of Justice of BiH), 29 May 2026.

## 3. Strengths and Capacity Gaps of CSOs

### Key Strengths

- Strong grassroots engagement and community trust, particularly visible in local environmental movements and community-led initiatives opposing hydropower projects, illegal waste disposal, and urban development pressures.<sup>54</sup>
- Flexibility and rapid response to emerging local needs, especially demonstrated during crisis situations such as the 2024 floods, when CSOs and informal volunteer groups provided immediate support in affected communities.<sup>55</sup>
- Long-standing experience in peacebuilding and intercultural cooperation, with organisations such as youth and inter-ethnic dialogue initiatives continuing to operate across divided communities.
- Established regional and international partnerships and networks, particularly among larger CSOs engaged in EU-funded programmes and cross-border cooperation projects.
- Expertise in non-formal education and participatory approaches, including youth councils, debate clubs, and civic education programmes implemented across municipalities.
- Growing local expertise in deliberative democracy facilitation: an emerging pool of practitioners in Bosnia and Herzegovina has gained experience in designing, facilitating, and implementing citizens’ assemblies through Council of Europe–supported initiatives and related programmes.<sup>56</sup>

*“Strong CSOs in Bosnia and Herzegovina are distinguished mainly by their ability to mobilise people, influence public opinion and combine activism with expertise. The strongest are those that can bring citizens together around a concrete issue, especially a few activist and environmental organisations with a strong community base. Another important group are organisations that have professional expertise, legal knowledge or access to legal support, because they can use institutional mechanisms, prepare solid arguments and challenge decisions more effectively.”*

<sup>52</sup>Balkan Barometer, Regional Cooperation Council <https://www.rcc.int/balkanbarometer/home>

<sup>53</sup>CPCD, Report on Civil Society Landscape in Bosnia and Herzegovina (2024) <https://news.fundsforngos.org/2024/10/22/cpcd-unveils-2024-report-on-civil-society-landscape-in-bosnia-and-herzegovina/>

<sup>54</sup>The Role of Civil Society in Environmental Governance in Bosnia and Herzegovina (2024) <https://mapub.org/ojs/index.php/mapss/article/view/141>

<sup>55</sup>IOM BiH, 2024 Flood and Landslide Response Situation Report <https://bih.iom.int/sites/g/files/tmzbd11076/files/documents/2025-02/2024-flood-and-landslide-response-situation-report-20-feb-1.pdf>

<sup>56</sup>Council of Europe, Deliberative democracy in Bosnia and Herzegovina <https://www.coe.int/en/web/sarajevo/deliberative-democracy-in-bosnia-and-herzegovina>

KII, CPCD, 19 May 2026.

### Key Capacity Gaps

- Insufficient long-term financial sustainability and heavy dependence on international donor funding, with many organisations relying almost entirely on short-term project grants. The absence of stable institutional or core funding mechanisms makes it difficult for CSOs to maintain permanent staff or long-term programmes.
- Limited human resource capacity, including difficulties in retaining qualified staff and increasing burnout due to project-based work, particularly in smaller organisations outside major urban centres such as Sarajevo, Banja Luka, or Mostar.
- Uneven organisational development: a strong divide exists between a small number of professionalized CSOs (mostly urban) and a large number of smaller volunteer-based or informal organisations operating at local level, the latter often lacking the technical and administrative capacities required to access EU and international funding opportunities.
- "Projectisation" of civil society: organisations increasingly adapt their work to donor priorities rather than developing long-term strategic agendas based on community needs, shifting thematic focus between unrelated projects depending on available calls for proposals. This contributes to fragmentation of efforts, weak institutional memory, and limited long-term policy impact.

*"Over time, this can turn CSOs into project implementers instead of civic actors rooted in citizens' needs. Local grass-root CSOs often understand community needs very well, but they have limited staff, weak administrative capacity and unstable funding. Because of this, they may adapt their work to available calls for proposals rather than to their long-term mission or the real priorities of the community."*

KII, Independent Expert (former Senior Adviser for Civil Society Development, Ministry of Justice of BiH), 29 May 2026.

- Administrative burden linked to complex reporting and project-based fundraising requirements, particularly for EU-funded projects, which often require significant administrative and financial management capacity that smaller organisations cannot sustain.
- Limited digital and advocacy capacity in a significant part of the sector, especially in rural and semi-urban areas where organisations have less access to training, infrastructure, and communication tools.
- Limited internal governance and strategic planning capacities, especially among grassroots organisations that rely heavily on volunteers rather than professional staff structures.

### Financial Sustainability

Most organisations continue to rely **on short-term project funding cycles**, which limits strategic planning, organisational continuity, and institutional learning. Public funding for civil society is fragmented, non-transparent, and inconsistently distributed across different levels of government. Smaller grassroots organisations, particularly in rural or economically underdeveloped communities, frequently lack the **administrative and technical capacities** needed to access larger EU or international funding programmes. International donor support remains the key pillar of sector sustainability, but simultaneously contributes to structural dependency on short-term project cycles that prevent long-term institutional development.<sup>5758</sup> The most structurally consequential recent development for civil

<sup>57</sup>European Commission, Bosnia and Herzegovina Report 2025 [https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2025\\_en](https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2025_en)

<sup>58</sup>EESC Statement: Bosnia and Herzegovina must protect its civil society to advance towards the EU <https://www.eesc.europa.eu/pt/documents/bosnia-and-herzegovina-must-protect-its-civil-society-order-advance-towards-eu>



society is the withdrawal of major international donors, particularly USAID. Every interviewee identifies this as a critical turning point:

*“The situation is now even more difficult and uncertain due to the withdrawal of several important international donors who had provided financial support for the stable functioning of a significant number of civil society organizations. There has been no real progress in funding in recent years — in fact, the situation is now worse. They used to play an important stabilizing role. This departure has decreased financial security and already had a direct negative impact on many organizations, while the full consequences, both direct and indirect, are not yet visible.”*

KII, IREI – Institute for Development and European Integration, 23 May 2026.

#### 4. Citizen Participation in Public Life and Decision-Making

Citizen participation in Bosnia and Herzegovina remains relatively weak in formal political and institutional processes. **Public trust** in political institutions is low, while corruption, political polarisation, and limited responsiveness of decision-makers contribute to political apathy and reduced engagement in formal democratic mechanisms. Formal participation mechanisms exist at different levels of government and include public consultations, advisory and consultative bodies (such as youth councils and thematic working groups), public hearings, local community councils, participatory planning processes, and consultative mechanisms at municipal level. However, these mechanisms are applied inconsistently and frequently do not ensure meaningful influence on final policy decisions.<sup>5960</sup> In recent years, several local self-government units have introduced more structured participatory governance approaches, particularly through local governance reforms and Open Government Partnership (OGP)-related initiatives. Municipalities such as Travnik, Žepče, and Modriča have implemented participatory planning, transparency, and citizen consultation mechanisms aimed at strengthening cooperation between local authorities, CSOs, and citizens. These include public consultations on local development strategies, participatory budgeting elements, digital communication tools, and thematic consultative working groups.<sup>61</sup>

An important innovation in the BiH civic participation landscape is the gradual introduction of **citizens' assemblies through Council of Europe**-supported deliberative democracy projects. These assemblies bring together randomly selected citizens to deliberate on specific local policy issues and provide structured recommendations to municipal authorities. The Citizens' Assembly of Mostar, supported by LDA Mostar's "Elect Mostar" civic initiative, represents a notable concrete example. While still dependent on external technical and financial support, citizens' assemblies are increasingly recognised as a promising model for strengthening participatory governance and rebuilding trust between citizens and institutions.<sup>626364</sup> Digital participation tools have also emerged as mechanisms for strengthening communication between citizens and local authorities. The eCitizen platform (ecitizen.ba) was developed to facilitate citizen feedback, reporting of local community issues, and more direct interaction with local self-government units. The platform for good governance practices (najboljeprakse.ba), supported by the Council of Europe, has additionally served as a vehicle for

<sup>59</sup>Balkan Barometer, Regional Cooperation Council <https://www.rcc.int/balkanbarometer/home>

<sup>60</sup>European Commission, Bosnia and Herzegovina Report 2024 [https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024\\_en](https://enlargement.ec.europa.eu/bosnia-and-herzegovina-report-2024_en)

<sup>61</sup>Open Government Partnership, Travnik, Bosnia and Herzegovina <https://www.opengovpartnership.org/members/travnik-bosnia-herzegovina/>

<sup>62</sup>Council of Europe, Deliberative democracy in Bosnia and Herzegovina <https://www.coe.int/en/web/sarajevo/deliberative-democracy-in-bosnia-and-herzegovina>

<sup>63</sup>Citizens' Assembly of Mostar <https://mostargradimo.ba/en/home/>

<sup>64</sup>LDA Mostar, Elect Mostar civic initiative <https://www.ldamostar.org/en/portfolio/elect-mostar/>

sharing and scaling participatory governance models across municipalities.<sup>65</sup> Youth participation is more visible through volunteerism, non-formal education programmes, debate clubs, youth councils, and digital activism. However, broader structural barriers — including emigration, lack of institutional trust, and limited responsiveness to youth concerns — continue to constrain sustained youth engagement. Citizen engagement more broadly remains ad hoc and issue-driven, typically activated in response to specific local problems rather than sustained through structured and continuous civic involvement.<sup>66</sup>

*“In general, continuous and systematic citizen participation in decision-making processes is weak and limited to a small number of issues. Participation is most intensive, and citizens show the greatest interest, in activities related to specific local problems or issues that directly affect their everyday lives. The most active participation is generally shown by representatives of civil society organisations, certain experts, activists, young people involved in informal initiatives, as well as citizens directly affected by particular problems. The least participation comes from citizens belonging to vulnerable and marginalised groups, residents of rural areas, as well as many young people who are often discouraged by the political situation, economic insecurity, and the feeling that they cannot influence change.”*

KII, IREI, 23 May 2026.

*“Citizens often do not participate because they are motivationally exhausted, economically burdened, and politically disappointed. Many believe the system is closed, that CSOs are part of a pyramid of self-interest, that decisions are made in advance, that activism has no effect, or that public engagement may expose them to problems.”*

KII, SMART Center / CPCD, 25 May 2026.

## 5. Main Barriers to Civic Participation

### Institutional and Governance Barriers

- The highly decentralised and administratively complex governance system distributes competencies related to civic participation across state, entity, cantonal, Brčko District, and municipal levels. This creates unequal opportunities for citizens and CSOs depending on their local context, with participation mechanisms ranging from genuinely functional in some municipalities to entirely absent in others.<sup>67</sup>
- Public consultations are frequently organised at late stages of policymaking and function as procedural obligations rather than genuine dialogue mechanisms. Institutions often fail to provide feedback on how public input was incorporated, and CSOs are still commonly perceived as project implementers rather than equal policy partners.

*“The two top barriers are: 1. Lack of trust in institutions and decision-making processes — many citizens do not believe that their opinions and participation will have a real influence on public policies or decisions. 2. Limited and mostly formal participation mechanisms — although legal and institutional mechanisms for public consultations*

<sup>65</sup>Najboljeprakse.ba – Council of Europe platform for good practices in local communities in BiH <https://www.coe.int/bs/web/sarajevo/-/all-the-good-practices-in-one-place-new-online-platform-for-local-communities-in-bosnia-and-herzegovina>

<sup>66</sup>UNDP, SCORE 2025 Executive Summary [https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score\\_2025-executive\\_summary.pdf](https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score_2025-executive_summary.pdf)

<sup>67</sup>BCSDN, Civic Space Report 2026 <https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-Western-Balkans-European-Civic-Forum-1-1.pdf>



*formally exist, they are often implemented only to fulfil procedural requirements and support political intentions and decisions.”*

KII, IREI, 23 May 2026.

- The fragmented CSO registry system — maintained across multiple entity and cantonal registries without harmonisation or interoperability — limits transparency and complicates evidence-based policymaking and strategic planning for both institutions and donors.

### Political and Legal Barriers

- Political polarisation, ethnic divisions, and the politicisation of public institutions contribute to a climate in which civic engagement is often interpreted through partisan or ethnic frameworks. In Republika Srpska, the “foreign agents” legislation — later annulled by the Constitutional Court — created significant insecurity and public pressure on civil society actors, contributing to a chilling effect on independent advocacy and watchdog work.<sup>68</sup>
- Clientelism and corruption remain important barriers, particularly at local level, where access to public resources and institutional cooperation may depend on informal political relationships rather than transparent criteria. Organisations perceived as politically critical or independent often face more limited access to public funding.<sup>69</sup>

*“CSOs and activists face political, financial and reputational pressure, ranging from exclusion and public discrediting to threats and institutional restrictions, such as the recent police ban on the peaceful Ozren protest in Banja Luka. More subtle pressures also exist, including workplace isolation or informal punishment of activists, especially in public service, which discourages people from active civic engagement.”*

KII, CPCD, 19 May 2026.

### Financial Barriers

- Most CSOs rely heavily on short-term international donor funding, while stable institutional or core funding mechanisms remain underdeveloped. Public funding for civil society is fragmented, non-transparent, and inconsistently distributed across governance levels.
- Smaller grassroots organisations, especially in rural and economically underdeveloped communities, frequently lack the administrative and technical capacities needed to access larger EU or international funding programmes, further reinforcing inequalities within the sector.
- Delays in implementation of EU-related reform commitments — including the uneven assessment reports on civic participation trends and barriers — contribute to public perceptions of institutional inefficiency and reduce citizens’ trust in the capacity of political actors to deliver meaningful reforms.<sup>70</sup>

### Societal Barriers

- Low trust in institutions, political apathy, weak civic education, and long-term post-conflict social fragmentation continue to limit broader civic engagement. Citizen participation is reactive and issue-based rather than continuous and structured, reflecting a still underdeveloped civic culture of sustained democratic participation.

<sup>68</sup>Media.ba, Constitutional Court of BiH annuls the ‘Foreign Agents’ Law <https://www.media.ba/bs/vijesti-i-dogadaji-vijesti/ustavni-sud-bih-neustavnim-proglasio-zakon-o-stranim-agentima>

<sup>69</sup>Transparency International BiH, Annual Report 2025 <https://ti-bih.org/wp-content/uploads/2026/03/TIBIH-ANNUAL-REPORT-2025.pdf>

<sup>70</sup>Council of Ministers of BiH, Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029 <https://mpr.gov.ba/hr/strategija-vm-bih-za-stvaranje-poticajnog-okruzenja-za-razvoj-civilnog-drustva-2025-2029>

- Significant demographic challenges, particularly youth emigration and broader brain drain trends, directly affect the long-term sustainability of civic activism and local community engagement. Many younger and highly educated citizens increasingly perceive civic participation as ineffective in producing meaningful political or institutional change.<sup>71</sup>

## 6. Priority Actions to Strengthen CSOs and Improve Civic Participation

### Implement and Operationalise the 2025–2029 Civil Society Strategy Across All Governance Levels

- The effective implementation of the Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029 must be treated as the central reform priority. Particular attention should be given to translating the Strategy into entity, cantonal, and local policy frameworks, where implementation currently remains highly uneven. This requires stronger coordination mechanisms between governance levels, clearer institutional responsibilities, and increased administrative capacities for participatory governance.<sup>72</sup>
- CSOs should be systematically supported in their advocacy efforts to ensure the Strategy is recognised and applied beyond the state level, particularly in cantons and municipalities where institutional openness and administrative readiness remain limited.

### Improve the Quality and Effectiveness of Civic Participation Mechanisms

- Establish clear standards and legally binding obligations for public consultations, ensuring earlier and more meaningful involvement of CSOs and citizens in policymaking processes. Institutions should be required to publish feedback explaining how public input was incorporated into final legislation.<sup>73</sup>
- Strengthen and institutionalise deliberative democracy mechanisms, in particular citizens' assemblies that have been piloted in several municipalities with Council of Europe support. These mechanisms require stronger institutional recognition, sustainable financing, and integration into regular local governance practices rather than remaining dependent on international donor support.<sup>74,75</sup>
- Improve transparency and public access to information, including through the development of a more coordinated and regularly updated registry system for civil society organisations across different levels of government, addressing the current fragmentation of CSO data across entity and cantonal registries.

### Reform Public Consultation into a Binding Accountability Mechanism

- Strengthen and institutionalise deliberative democracy mechanisms, particularly citizens' assemblies that have been piloted in Mostar and Sarajevo with Council of Europe support. These require sustainable financing and formal integration into municipal governance rather than remaining project-dependent.<sup>76</sup>

<sup>71</sup>UNDP, SCORE 2025 Executive Summary [https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score\\_2025-executive\\_summary.pdf](https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score_2025-executive_summary.pdf)

<sup>72</sup>Council of Ministers of BiH, Strategy for Creating an Enabling Environment for Civil Society Development 2025–2029 <https://mpr.gov.ba/hr/strategija-vm-bih-za-stvaranje-poticanog-okruzenja-za-razvoj-civilnog-drustva-2025-2029>

<sup>73</sup>Analysis of the current situation and joint participation of the government and civil society sectors in BiH <https://irei.ba/en/analysis-of-the-current-situation-and-joint-participation-of-the-government-and-civil-society-sectors-in-bih-and-the-region-in-the-eu-integration-process/>

<sup>74</sup>Council of Europe, Deliberative democracy in Bosnia and Herzegovina <https://www.coe.int/en/web/sarajevo/deliberative-democracy-in-bosnia-and-herzegovina>

<sup>75</sup>Citizens' Assembly of Mostar <https://mostargradimo.ba/en/home/>

<sup>76</sup>Council of Europe, Deliberative democracy in Bosnia and Herzegovina <https://www.coe.int/en/web/sarajevo/deliberative-democracy-in-bosnia-and-herzegovina>

*“I would introduce a binding system of public consultations at all levels of government, with clear deadlines, publicly available explanations of why proposals were accepted or rejected, and sanctions for institutions that conduct participation only formally. Without such an obligation, civic participation remains a decorative exercise rather than a democratic mechanism.”*

KII, SMART Center / CPCD, 25 May 2026.

*“I would introduce a more meaningful, transparent and accountable system of public consultations across all levels of government in Bosnia and Herzegovina. This should include early involvement of citizens and CSOs, clear information, reasonable deadlines, accessible language, transparent selection of CSO representatives in working groups, and mandatory feedback explaining which proposals were accepted, which were rejected and why. People are more likely to engage when they see that their input is taken seriously, even when it is not fully accepted. Meaningful feedback and visible influence are essential for rebuilding trust.”*

KII, Independent Expert (former Senior Adviser for Civil Society Development, Ministry of Justice of BiH), 29 May 2026.

### Strengthen Financial Sustainability of Civil Society

- Public funding mechanisms for CSOs should become more transparent, predictable, and strategically oriented, with clearer criteria and stronger accountability standards. This is particularly important for smaller grassroots organisations operating in rural areas and smaller municipalities, which often face the greatest barriers in accessing funding and institutional support.
- Support should be provided for long-term organisational development rather than exclusively project-based financing. Multi-year institutional grants would allow organisations to invest in staff retention, strategic planning, and capacity development beyond the cycle of individual projects.
- Ensure that the EU Reform and Growth Facility and other reform-linked financial instruments allocate dedicated resources to civil society capacity development, building on the momentum created by the November 2025 Reform Agenda approval.<sup>77</sup>

### Build Organisational Capacity and Reduce Sector Inequalities

- Invest in capacity-building programmes covering organisational resilience, strategic planning, advocacy skills, digital capacities, and financial management. Support structures such as local resource centres, training programmes, and mentoring mechanisms should specifically target smaller community-based organisations in rural areas and smaller municipalities.
- Invest in long-term civic education and media literacy programmes that develop a culture of sustained democratic participation from an early age, rather than civic engagement remaining reactive and crisis-driven.

### Address Youth Participation and Emigration

- Create more meaningful opportunities for youth involvement in local decision-making, public policy processes, and community initiatives, as essential for strengthening future civic engagement capacities. The continued emigration of young and educated citizens represents a major long-term challenge for democratic participation and civic activism that requires structural responses beyond the civil society sector alone.<sup>78</sup>

<sup>77</sup>European Commission Reform and Growth Facility for the Western Balkans [https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/reform-and-growth-facility-western-balkans\\_en](https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/reform-and-growth-facility-western-balkans_en)

<sup>78</sup>UNDP, SCORE 2025 Executive Summary [https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score\\_2025-executive\\_summary.pdf](https://www.undp.org/sites/g/files/zskgke326/files/2026-04/score_2025-executive_summary.pdf)

## 7. Conclusion

The Bosnia and Herzegovina context distills into four insights for the ROOT WB project. The central challenge is not the absence of frameworks but the absence of institutional culture and political will to activate them — meaning capacity-building interventions must be consistently paired with institutional advocacy work to produce durable results. The "foreign agents" law trajectory demonstrates that state-level constitutional protections remain a real civic space safeguard even in a fragmented political system, and that civil society's documentation and advocacy functions contributed to judicial accountability — a model the project should draw on. The citizens' assembly experience in Mostar and other municipalities shows that deliberation across ethnic and partisan lines is achievable when structured around concrete local issues, and that locally trained facilitators are the key sustainability factor; the project should prioritise formal integration of these mechanisms into municipal governance rather than leaving them project-dependent. Finally, EU accession provides genuine leverage for CSO advocacy, but periodic political and institutional blockages underline that external conditionality alone is insufficient to drive reform implementation — making domestic coalition-building and community-level engagement indispensable complements to EU-alignment strategies.

## COUNTRY CONTEXT: SERBIA

### 1. Main Political and Social Developments Affecting Civil Society and Civic Participation

Over the past decade, and especially in recent years, Serbia has experienced a steady deterioration of the environment for civil society and civic participation. Reports by the [prEUgovor coalition](#), [CIVICUS Monitor](#), [Civic Initiatives](#), the [Balkan Civil Society Development Network](#), and other domestic, regional, and international organisations describe a political climate increasingly characterised by authoritarian tendencies, concentration of power, weakening of democratic institutions, and growing hostility toward independent civic actors.<sup>79</sup> One of the most significant developments has been the **gradual narrowing of civic space**. Although Serbia formally continues its EU accession process, civil society organisations have repeatedly pointed to the weakening of parliamentary oversight, political influence over independent institutions, and the marginalisation of meaningful public consultation. The [prEUgovor coalition](#) has consistently noted that reforms linked to the rule of law and democratic governance often remain superficial, while real political power has become concentrated within the executive branch. Activists, investigative journalists, and human rights organisations have frequently been portrayed in pro-government media as foreign agents, enemies of the state, or actors working against national interests. Numerous smear campaigns against critical NGOs, accompanied by attempts to delegitimise organisations receiving international funding, have been documented. **Government-aligned organisations**, often referred to as GONGOs, are presented as substitutes for independent civil society, while public funds intended for civil society are allocated to them.<sup>80</sup>

Key informant interviews conducted for this assessment with civil society practitioners from Belgrade, Niš, and Leskovac capture a unanimously bleak picture of the current environment. The geographic range of the interviews is itself analytically significant: the same conditions are described from the capital and from small cities in southern Serbia, indicating that **deterioration** is not a metropolitan phenomenon but a **national** one.

*“Completely hostile — above all on the part of the government — and closed to any kind of work with institutions, so it is very unfavourable.”*

KII, Katarina Golubović, Lawyers’ Committee for Human Rights (YUCOM), Belgrade, 21 May 2026.

*“The environment is ‘hostile’, with a narrative that prevents CSOs from achieving their mission and goals, and with no possibility of cooperating with the key actors needed for change — namely, decision-makers.”*

KII, Dragan Đorđević, Committee for Human Rights Niš (CHRIN), Niš, 22 May 2026.

*“CSOs in Serbia today live between attacks, fear, and exhaustion, but we are somehow still here to support one another — support that is very often lacking — and yet we endure, existing and surviving within our communities.”*

KII, Ljiljana Nešić, Women for Peace, Leskovac, 29 May 2026.

As institutional channels for influence became less effective, civic activism increasingly shifted toward informal grassroots mobilisation and street protests. Environmental movements became especially important in this transformation. Protests against lithium mining projects, concerns over pollution, and local environmental destruction mobilised broad coalitions of citizens, activists, students, and local communities. These protests demonstrated that dissatisfaction with governance was no longer

<sup>79</sup>prEUgovor Coalition Alarm Reports on Progress of Serbia, available at: <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>80</sup>Civic Initiatives (‘Gradjanske inicijative’), reports ‘Tri slobode’: <https://www.gradjanske.org/category/vesti/tri-slobode-pod-lupom/>

confined to professional NGOs but had spread into wider society — civic engagement became more decentralised and locally organised.<sup>81</sup> Activists, investigative journalists, and human rights organisations have frequently been portrayed in pro-government media as **foreign agents, enemies of the state, or actors working against national interests**. The Leskovac interviewee describes an environment of personal insecurity that goes beyond political labelling into physical threat: her home was broken into as an act of intimidation following her organisation's public advocacy on femicide and violations by local authorities.<sup>82</sup>

*"When you publicly issue a statement against the Mayor of Leskovac, saying he broke the law by speaking in the assembly about a victim of violence — they then come to your house and leave horrifying scenes behind; they take nothing, but I read it as: 'We came this time when you weren't here; next time we will come when you are.' We are acceptable only when we stay silent."*

KII, Ljiljana Nešić, Women for Peace, Leskovac, 29 May 2026.

**The collapse of the railway station canopy in Novi Sad in November 2024** marked a particularly important turning point. The tragedy triggered massive civic protests across Serbia and became a symbol of broader frustrations with corruption, clientelism, and institutional negligence. The demonstrations evolved into the largest wave of civic mobilisation in decades, with the largest single protest taking place on 15 March 2025 (since October 5, 2000). State responses to these protests reflected another major trend: the increasing use of repression and intimidation against civic actors. Monitoring organisations documented arrests, arbitrary detentions, intimidation of activists and journalists, administrative and legal pressure (intrusive financial inspections and SLAPP suits), police brutality, smear campaigns in pro-government media, and office raids.<sup>83,84</sup>

*"The 'hostile' attitude of public authorities towards civil society is now even more pronounced."*

KII, Dragan Đorđević, CHRIN, Niš, 22 May 2026.

Concerns about surveillance and digital repression have become increasingly prominent. **Amnesty International's 2024 report *A Digital Prison: Surveillance and the Suppression of Civil Society in Serbia*** documented the systematic use of digital surveillance technologies against civil society actors. The report found evidence that Serbian police and intelligence agencies used advanced phone-forensics tools produced by Cellebrite, together with spyware including Pegasus and a domestically developed system known as NoviSpy, to unlawfully target journalists, environmental activists, and members of civil society. Amnesty International described these practices as part of a broader system of "digital repression" aimed at discouraging dissent and creating a chilling effect on civic activism and freedom of expression.<sup>85</sup> The cumulative trajectory of these developments is reflected in international assessments. In 2018, **CIVICUS Monitor** downgraded Serbia's civic space from "narrowed" to "obstructed", and in 2025 further to "repressed", due to escalating attacks on freedoms of association, assembly, and expression. These assessments emphasise that civil society in Serbia continues to operate but under growing legal, political, financial, and media pressure.<sup>86</sup> A demonstrated capacity for grassroots mobilisation and coalition-building — evidenced by the mass civic protests of 2024—

<sup>81</sup> CIVICUS Monitor Serbia profile: <https://monitor.civicus.org/country/serbia/>

<sup>82</sup> Mašina, report on break-in at the home of Ljiljana Nešić in Leskovac <https://www.masina.rs/dirnuli-su-me-u-slobodu-kuca-je-mesto-gde-sam-bila-najsigurnija-kaze-ljiljana-nesic-za-masinu-nakon-obijanja-njenog-doma-u-leskovcu/>

<sup>83</sup> YUCOM, Reports on the Attacks on Human Rights Defenders in Serbia: <https://yucom.org.rs/en/report-on-the-attacks-on-human-rights-defenders-in-serbia-for-2025-2/>

<sup>84</sup> Front Line Defenders, Serbia profile: <https://www.frontlinedefenders.org/en/location/serbia>

<sup>85</sup> Amnesty International, 'A Digital Prison: Surveillance and the Suppression of Civil Society in Serbia' (2024): <https://www.amnesty.org/en/search/serbia/>

<sup>86</sup> CIVICUS Monitor Serbia: <https://monitor.civicus.org/country/serbia/>



2025 and the cross-sector alliances they generated — represents a distinct form of civic strength that extends beyond organisational capacity into broader societal resilience.

## 2. Legal, Policy and Institutional Framework for CSOs

### Formal Framework

In September 2023, the Government of the Republic of Serbia established the **Council for the Creation of an Environment Stimulating for the Development of Civil Society** — an advisory body composed of representatives of civil society organisations and state institutions. Its stated mandate is to "monitor and analyse the situation in the most significant areas related to the activities and work of civil society, such as freedom of association and assembly, freedom of expression, and the inclusion of citizens in decision-making processes."<sup>87</sup> In mid-January 2025, the Government adopted the Action Plan for the implementation of the Strategy for Creating an Enabling Environment for the Development of Civil Society in Serbia for the period 2025–2026. However, only ten days later, members of the Council representing CSOs suspended their participation due to escalating threats and pressure against civil society.<sup>88</sup>

The escalation of pressure on Serbian civil society in early 2025 reached a qualitatively new level with coordinated police raids on the premises of several prominent organisations, including Civic Initiatives, the Center for Research, Transparency and Accountability (CRTA), the Centre for Practical Politics, and the Trag Foundation. The raids were carried out by the Criminal Police Directorate, citing alleged misuse of USAID funds, and followed weeks of coordinated smear campaigns in pro-government media and public accusations by senior state officials linking civil society to a so-called "**coloured revolution**." In parallel, the Administration for the Prevention of Money Laundering requested banks to provide detailed financial data of several leading CSO representatives, without specifying concrete criminal acts — a measure targeting organisations and individuals known for their critical stance toward the government. The European Civic Forum's 2026 Civic Space Report characterises these actions as part of a pattern in which AML/CFT mechanisms are deployed as instruments of selective enforcement and intimidation rather than legitimate financial oversight.<sup>89</sup>

A further dimension of pressure concerns cross-border civic engagement. Foreign and regional activists participating in civil society activities in Belgrade were detained and expelled without evidence or due process, using security narratives to restrict international civic cooperation. The pattern reinforces the broader chilling effect on civil society documented across Serbian partner organisations in the ROOT WB project: when surveillance, raids, financial investigations, and border controls are applied selectively against critical actors, the cumulative effect is a sector that self-censors not because of any single law but because the aggregate cost of visibility has become too high.<sup>90</sup>

### Practice: Enabling or Restrictive?

In practice, the framework is **decisively restrictive**. Despite the formal mechanisms described above, the political environment has rendered them largely non-functional. Most prominent organisations critical of the government remained outside the Council from its establishment. The current Government, elected on 2 May 2024, delayed the appointment of its representatives to the Council

<sup>87</sup>PrEugovor, Alarm Report, May 2025, p. 30–31: <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>88</sup>PrEugovor, Alarm Report, May 2025, p. 35: <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>89</sup>BCSDN / European Civic Forum, Civic Space Report 2026: Western Balkans: <https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-Western-Balkans-European-Civic-Forum-1-1.pdf>

<sup>90</sup>BCSDN / European Civic Forum, Civic Space Report 2026: Western Balkans: <https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-Western-Balkans-European-Civic-Forum-1-1.pdf>

for more than three months, effectively preventing the body from functioning until the end of August 2024 — precisely during a period marked by intensified attacks and pressure against civil society organisations.<sup>91</sup>

*“In March 2025, and then in April 2026, we saw the government adopt two decrees that effectively suspend provisions of the Law on State Administration and the Law on the Planning System; these now provide that public consultations and public debates are not held for laws and regulations adopted in the process of negotiations with the European Union. In other words, this is the legal closing-off of any possibility for civil society to take part, within the institutional process, in shaping public policies and solutions.”*

KII, Katarina Golubović, YUCOM, Belgrade, 21 May 2026.

So at the end of March 2026, the Government amended regulations to exempt EU accession-related documents from mandatory public consultations — formally justifying exclusion by the need to accelerate EU integration, while in practice removing the main institutional channel for civil society engagement on issues most central to Serbia’s democratic trajectory.<sup>92</sup> The YUCOM interviewee additionally documents that the Government amended its Rules of Procedure in November 2025, making public consultations non-mandatory and introducing discretionary authority to decide when they would be held. She further documents direct institutional instructions against cooperation with civil society:

*“We have noticed that, when we try to cooperate and implement certain activities with certain bodies, we are told they have been ordered by the ministry not to cooperate with the NGO sector in any way. These are, for example, the national environmental inspectors — they were instructed by their parent Ministry of Environmental Protection not to take part at the local level in councils that bring together public prosecutors, police, and local inspectors from various fields.”*

KII, Katarina Golubović, YUCOM, Belgrade, 21 May 2026.

In early February 2025, **a broad coalition of organisations working on the rule of law, human rights, and democratisation suspended cooperation** with Serbia's legislative and executive authorities. At the same time, the Programme Council of the National Convention on the European Union (NCEU) appealed to the European Commission, stating that the deepening political crisis in Serbia prevented CSOs from continuing to participate in EU accession-related activities involving cooperation with political decision-makers.<sup>93</sup> On 29 November 2024, a draft **Law on the Special Register of Agents of Foreign Influence** was submitted to the Serbian Parliament. The proposed law would require many civil society organisations working on human rights, democratisation, and public advocacy to register officially as "agents of foreign influence" and would impose severe financial penalties for non-compliance. The proposal was widely interpreted by domestic and international observers as an attempt to stigmatise, intimidate, and silence critical voices in Serbian society.<sup>95</sup>

## Cooperation Between CSOs and Public Institutions

<sup>91</sup>PrEugovor, Alarm Report, May 2025, p. 30–31: <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>92</sup>PrEugovor Coalition, Alarm Report, May 2026 (forthcoming) <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>93</sup>BCSP, Joint resolution on the suspension of cooperation with the legislative and executive authorities in Serbia: <https://bezbednost.org/en/joint-resolution-on-the-suspension-of-cooperation-with-the-legislative-and-executive-authorities-in-serbia/>

<sup>94</sup>National Convention on the EU, letter to the European Commission: <https://eukonvent.org/nkeu-sent-a-letter-to-the-president-of-the-ec-eu-should-not-turn-its-backs-on-serbian-citizens/>

<sup>95</sup>PrEugovor, Alarm Report, May 2025, p. 35: <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

Cooperation between independent civil society and public institutions is **effectively suspended**. As noted above, major organisations have formally withdrawn from cooperation mechanisms due to the political climate. During 2024, the Council for Civil Society held six sessions, of which only one — the third — addressed the increasingly frequent attacks on civil society representatives. The remaining sessions largely ignored this pressing issue. This pattern reflects a structural unwillingness at the institutional level to engage with independent civil society on issues of fundamental concern to the sector.<sup>96</sup>

The relationship is described in consistent terms across all three interviewees: instrumentally formal when it suits government, actively hostile when it does not.

*“Insincere. With no genuine wish to understand that civil society organisations are a bridge to voters. The authorities do not grasp the benefits of CSOs.”*

KII, Dragan Đorđević, CHRIN, Niš, 22 May 2026.

### Public Perception and Trust

Public perceptions of civil society organisations have become deeply polarised. A segment of society influenced by pro-government media narratives increasingly perceives CSOs as "foreign agents" or "traitors" acting against national interests. At the same time, another part of the public — particularly mobilised by the civic protests of 2024–2025 — recognises the important role that civil society plays in documenting corruption, monitoring human rights violations, and advocating for democratic accountability and the rule of law.<sup>97</sup>

*“The narrative about CSOs spread by the government’s media machinery — that CSOs are foreign agents. The most zealous in this are the tabloids, which have large circulations precisely because they are cheap. People do not realise that with their own money they are paying for their own deception.”*

KII, Dragan Đorđević, CHRIN, Niš, 22 May 2026.

## 3. Strengths and Capacity Gaps of CSOs

### Key Strengths

In the summer of 2025, the Belgrade Centre for Security Policy (BCSP) conducted a needs-mapping survey targeting activists, CSOs, and human rights defenders in Serbia. The online survey was distributed to more than 100 contacts and yielded 66 responses. The findings were analysed across four thematic areas: financial and other material resources; IT, legal, and psychological support; different types of training; and media visibility, networking, and solidarity.<sup>98</sup> Serbia's civil society sector has demonstrated notable resilience and capacity in several areas:

- A broad network of experienced human rights, democratisation, and anti-corruption organisations, several of which have achieved recognition at EU and international level through their monitoring, research, and advocacy work.
- Strong engagement in EU accession-related processes through shadow reporting and EU-facing advocacy — despite institutional barriers.
- Growing capacity in digital security, documentation of repression, and strategic litigation, reflecting the sector's adaptation to an increasingly hostile environment.

*“Strong organisations have serious ties and connections with international organisations at all levels. In that sense, they are recognised as actors by governments*

<sup>96</sup>PrEUgovor, Alarm Report, May 2025, p. 30–31: <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>97</sup>Balkan Civil Society Development Network, Serbia resources: <https://balkancsd.net/?s=serbia>

<sup>98</sup>BCSP Needs Survey of Human Rights Defenders in Serbia, Summer 2025. Findings referenced throughout Section 3.

*too. This gives them particular strength, because they enjoy protection from international actors; and, on the other hand, their visibility with the wider public is their protection on the home front.”*

KII, Katarina Golubović, YUCOM, Belgrade, 21 May 2026.

- Capacities in project writing and public advocacy have improved since 2019, as documented by the BCSP needs survey — though this progress occurs against a backdrop of worsening financial security and political pressure, suggesting that organisational skills are developing faster than the structural conditions needed to sustain them.

### Key Capacity Gaps

- Financial insecurity: Out of 66 survey respondents, 63 feel threatened by the lack of financial resources necessary for their work. This insecurity must be understood in the context of the drastic reduction of financial support from the United States, while funding from other sources has not increased proportionally.<sup>99</sup>
- Dependence on short-term project funding: An overwhelming majority of respondents (83%) stated that institutional grants are necessary — an increase of 4% compared to 2019 — reflecting deepening structural vulnerability. Project-based funding prevents long-term, systemic programming and organisational development.<sup>100</sup>
- Geographic imbalance: Organisations outside Belgrade are generally less institutionalised and face greater obstacles in accessing resources, equipment, and stable support. Feelings of marginalisation among smaller and non-Belgrade-based organisations highlight structural imbalances that undermine collective action.

*“The strong organisations are the ones based in big cities, close to donors, close to embassies, with absolutely everything available to them. From Leskovac, I cannot do that. Donor meetings are out of reach for us, embassies are out of reach — everything is out of reach.”*

KII, Ljiljana Nešić, Women for Peace, Leskovac, 29 May 2026.

- Cybersecurity needs: The demand for cybersecurity support and training has grown significantly, reflecting the documented use of digital surveillance tools against CSO staff and activists.
- Psychological burden: The rising need for psychological support signals growing burnout and stress among activists, driven by prolonged uncertainty, financial instability, and sustained pressure from state institutions.
- Fragmented solidarity: Although a clear majority of respondents recognise the necessity of stronger cooperation, many also perceive solidarity as fragmented, uneven, and concentrated within limited circles.

### Financial Sustainability

Financial sustainability is the **central challenge** for Serbian CSOs. International donors — particularly the United States — have significantly reduced their financial support, creating a funding gap that has not been filled from other sources.

*“Here we are not talking only about organisations funded by USAID — we must bear in mind that the termination of American funding to international organisations also affected the funds available from those other international organisations that had traditionally provided support. We see a trend of once-strong organisations simply disappearing from the civil society map.”*

<sup>99</sup>BCSP Needs Survey, Summer 2025.

<sup>100</sup>BCSP Needs Survey, Summer 2025.

KII, Katarina Golubović, YUCOM, Belgrade, 21 May 2026.

State funding is **heavily politicised** and directed predominantly toward government-aligned organisations (GONGOs) rather than independent civil society. Local philanthropy and corporate social responsibility remain underdeveloped. The demand for institutional (core) grants — as opposed to project grants — has grown, but the supply has not kept pace. For smaller organisations outside Belgrade, these pressures are acute and existential.

#### 4. Citizen Participation in Public Life and Decision-Making

The socio-political environment described in Section 1 has severely constrained citizens' ability to participate meaningfully in institutional processes. The Government of the Republic of Serbia has progressively reduced the transparency of processes for drafting and adopting laws, amendments, regulations, and strategies. Public debates on important draft laws have been conducted with minimal deadlines, scheduled during public holidays, and often without providing complete and timely information.<sup>101</sup> Most significantly, at the end of March 2026, the Government amended **the Regulation on Regulatory Impact Assessment and the Regulation on the Methodology for the Development of Public Policy Documents**, introducing provisions that exempt documents prepared within the EU accession process from mandatory public consultations and from obtaining the opinion of the Republic Secretariat for Public Policies. These amendments formally justify the exclusion by the need to accelerate EU integration; in practice, however, they reduce transparency, quality, and accountability in public policy-making, and significantly limit the space for participation by civil society and the expert community in areas central to the EU accession process — including Chapters 23 and 24.<sup>102</sup>

The emergence of fear is a dominant barrier to civic participation.

*“In recent years a kind of fear has crept in among citizens — fear of losing their job if they work in the public sector, fear of being recognised. Even women victims of violence who come to a social welfare centre and mention that they had been with us are asked there, ‘What are you doing there — you have no business going to them.’ When I run into people who work in local government — my old schoolmates, my neighbours — in a public space, they simply turn their heads away. I do not even get a ‘hello’. Still, there are people who prefer to remain anonymous, who donate clothes to us, who donate food to us — so in a way we quietly have citizens’ support. To be an activist in southern Serbia, in small towns, very often means standing alone on the street.”*

KII, Ljiljana Nešić, Women for Peace, Leskovac, 29 May 2026.

The lack of meaningful institutional participation, combined with growing repression, has triggered a wave of grassroots activism primarily expressed through mass protests and citizens’ assemblies.

*“The citizens’ assemblies (zborovi) were a story with potential, but they are interested only in changing the government, not in the other issues that CSOs work on. My experience of citizens’ assemblies shows me that people, when you inform them well and engage them properly, can understand the problems and look for solutions.”*

KII, Dragan Đorđević, CHRIN, Niš, 22 May 2026.

Citizens have increasingly engaged in **local forms of protest and self-organisation**, including the establishment of citizens' assemblies (zborovi). These developments signal that, while formal civic

<sup>101</sup>PrEUgovor, Alarm Report, May 2026 (forthcoming): <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>102</sup>PrEUgovor, Alarm Report, May 2026 (forthcoming): <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

space is being closed, informal civic energy remains strong. Formally registered civil society organisations continue to operate under significant political pressure and financial instability while nevertheless remaining active and influential actors within the public sphere. The interplay between institutionally marginalised CSOs and newly activated grassroots movements is a defining feature of the current civic landscape in Serbia.

## 5. Main Barriers to Civic Participation

### Legal and Institutional Barriers

- Marginalisation of public consultation: Public consultations are often formalistic, conducted within very short deadlines, or bypassed altogether — particularly for documents related to the EU accession process. The March 2026 regulatory amendments have formalised and extended these exclusions.<sup>103</sup>
- Suspension of CSO–government cooperation: Major civil society organisations have formally suspended cooperation with legislative and executive authorities due to escalating pressure and intimidation, effectively dismantling the institutional framework for civic engagement.<sup>104</sup>

*“The first obstacle is that the authorities have no intention of involving citizens — they neither want to nor know how. On the other hand, until the collapse of the canopy, citizens had been anaesthetised. And it is not as if we had had the means to involve citizens. One of the worst consequences of these 14 years is that the current authorities have made people sick of the very idea of engaging with the public interest.”*

KII, Dragan Đorđević, CHRIN, Niš, 22 May 2026.

- Proposed "foreign agents" legislation: The draft Law on the Special Register of Agents of Foreign Influence creates a chilling effect on independent civil society work, threatening to officially stigmatise organisations that receive international funding.<sup>105</sup>

### Legal and Political Repression

- Activists, journalists, and CSOs critical of the government are frequently targeted through smear campaigns, administrative pressure, financial inspections, SLAPP suits, police intimidation, and arrests — creating a systematic chilling effect on civic engagement.<sup>106</sup>
- Digital surveillance and spyware use against civic actors — as documented by Amnesty International — has created a climate of distrust and fear that suppresses communication, organising, and advocacy within civil society.<sup>107</sup>

### Financial Barriers

- Heavy dependence on short-term project funding, combined with a drastic reduction in US-sourced international support, has created acute financial insecurity across the sector.
- State funding is directed toward GONGOs rather than independent CSOs, structurally disadvantaging organisations critical of the government.
- Smaller and non-Belgrade-based organisations face compounded disadvantage in accessing resources, technical support, and donor networks.

<sup>103</sup>PrEUgovor, Alarm Report, May 2026 (forthcoming): <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>104</sup>BCSP, Joint resolution on the suspension of cooperation: <https://bezbednost.org/en/joint-resolution-on-the-suspension-of-cooperation-with-the-legislative-and-executive-authorities-in-serbia/>

<sup>105</sup>PrEUgovor, Alarm Report, May 2025, p. 35: <https://preugovor.org/Publications/1131/Alarm-Reports.shtml>

<sup>106</sup>YUCOM, Reports on Attacks on Human Rights Defenders in Serbia: <https://yucom.org.rs/en/report-on-the-attacks-on-human-rights-defenders-in-serbia-for-2025-2/>

<sup>107</sup>Amnesty International, 'A Digital Prison' (2024): <https://www.amnesty.org/en/search/serbia/>



## Societal Barriers

- Deeply polarised public perception of CSOs, amplified by pro-government media narratives portraying civil society as foreign-funded "traitors", undermines public trust and civic mobilisation capacity.<sup>108</sup>
- Psychological pressure and burnout among civil society activists, driven by sustained repression, financial instability, and security concerns, reduces the long-term capacity and retention of experienced practitioners.
- Structural geographic inequalities within the sector, with Belgrade-based organisations capturing a disproportionate share of resources, weaken the overall breadth and representativeness of civic engagement.

## 6. Priority Actions to Strengthen CSOs and Improve Civic Participation

### International Support and Condemnation of Undemocratic Practices

- Secure stable, long-term financial support from international actors for independent Serbian civil society, in response to the drastic reduction of US-sourced funding. This should include multi-year institutional grants that allow organisations to plan beyond the project cycle.
- Explicit and sustained condemnation by the international community — including the European Union, Council of Europe, and individual member states — of the Serbian authorities' undemocratic practices, including attacks on civil society, digital surveillance, and the proposed 'foreign agents' legislation.
- Targeted financial support mechanisms for organisations outside Belgrade, addressing the structural geographic imbalances that weaken the overall resilience and representativeness of Serbian civil society.

The CHRIN interviewee identifies the single most important system-level change in terms that reflect the communication and information dimension of civic exclusion:

*"Information, again. That is the first step. By information I mean informing citizens about what CSOs do, but also giving them the chance to say what is on their minds. They will see the work we do differently, and they will trust it more."*

KII, Dragan Đorđević, CHRIN, Niš, 22 May 2026.

The YUCOM interviewee points to access to public media as the structural change that would most empower civil society vis-à-vis the government's communication dominance:

*"Perhaps access to the public broadcaster. Even though NGOs have a certain media presence, the public broadcasting service — which reaches a far wider range of citizens — still remains out of reach for them. What is missing is the presentation of all the services that NGOs actually provide to citizens."*

KII, Katarina Golubović, YUCOM, Belgrade, 21 May 2026.

And the Leskovac interviewee names the deepest prerequisite for civic participation recovery:

*"Freedom from fear."*

KII, Ljiljana Nešić, Women for Peace, Leskovac, 29 May 2026.

### Legal and Institutional Reforms

- Withdraw the draft Law on the Special Register of Agents of Foreign Influence, which threatens to stigmatise, restrict, and effectively silence independent civil society organisations.

<sup>108</sup>Balkan Civil Society Development Network: <https://balkancsd.net/?s=serbia>

- Restore and strengthen mandatory public consultation requirements, reversing the March 2026 regulatory changes that exempted EU accession-related documents from public scrutiny.
- Ensure the functional independence and genuine representativeness of the Council for Civil Society.
- Establish legal safeguards against SLAPP suits, intrusive financial inspections, and other administrative tools used to harass and drain the resources of critical civil society organisations.

### Capacity Building and Organisational Resilience

- Invest significantly in cybersecurity training and tools for CSO staff and activists, addressing the growing threat of digital surveillance and spyware use documented by Amnesty International.
- Develop psychological support programmes for civil society activists, addressing the documented increase in burnout, stress, and trauma resulting from sustained repression and financial insecurity.
- Support the development of inter-organisational solidarity structures, mentoring networks, and resource-sharing mechanisms to address the fragmentation and geographic concentration identified in the BCSP survey.

### Regional and International Networking

- Regional and international networking among CSOs remains critically important for strengthening the position of independent civic actors in Serbia. Such networking provides not only solidarity and shared learning, but also visibility and protection for organisations operating in a repressive environment.
- Engagement with regional networks — such as the Balkan Civil Society Development Network — and international human rights bodies should be systematically supported and resourced.<sup>109</sup>

## 7. Conclusion

The Serbia context distils into four insights for the ROOT WB project. The primary need of Serbian civil society is not capacity building in the conventional sense but structural security — financial, physical, digital, and psychological — meaning any intervention must address the hostile operating environment as a precondition before meaningful capacity development becomes possible. The formal suspension of CSO–government cooperation is without close parallel in the region and signals a fundamental breakdown rather than a strained relationship: the project cannot design activities that assume government partnership or responsiveness in the Serbian context. The protests and the emergence of citizens' assemblies demonstrate that civic energy in Serbia remains significant but is increasingly channeled outside formal structures — the project's core challenge is bridging this gap between spontaneous civic mobilisation and the institutionalised civil society sector. Finally, the EU accession framework, which elsewhere provides normative leverage for civil society advocacy, has been perversely inverted in Serbia: The March 2026 regulatory changes use EU integration as justification for bypassing democratic participation, meaning CSOs cannot rely on EU-alignment arguments as their primary advocacy tool and must build domestic political coalitions that do not depend on external conditionality.

<sup>109</sup>Balkan Civil Society Development Network: <https://balkancsd.net/?s=serbia>

## COUNTRY CONTEXT: NORTH MACEDONIA

### 1. Main Political and Social Developments Affecting Civil Society and Civic Participation

In the Republic of North Macedonia, public debate remains largely focused on transparency, integrity, anti-corruption, human rights, and institutional accountability. These discussions have been significantly influenced by the tragic fire in a nightclub in Kočani in March 2025, which claimed the lives of 65 young people. The ongoing judicial proceedings, involving more than 70 defendants, have kept the tragedy at the centre of public attention, generating sustained discussions on institutional responsibility, inspection systems, public safety, and accountability, while also mobilising citizens' initiatives and public demands for stronger institutional oversight. The broader political context also influences civic participation, particularly in the area of EU integration, where political polarisation remains pronounced. Its effects are reflected less in partisan competition itself and more in its institutional consequences, including difficulties in building consensus on reform priorities, delays in implementing EU-related reforms, and discontinuity in consultation mechanisms. While the 2024 governmental transition introduced new political priorities, high-level institutional representatives continue to participate in and formally endorse many events organised by CSOs, demonstrating the recognised role of civil society in public dialogue and the EU integration process.

Nevertheless, relations between public institutions and CSOs have been marked by periods of tension since 2022, particularly following CSO representatives' withdrawal from the Government Council for Cooperation with Civil Society Organisations in protest against inconsistent institutional practices. Although the Council was reactivated in 2025, its impact remains limited, as its functioning remains largely institution-driven and has yet to demonstrate a stronger influence on civic participation and independent civil society engagement.<sup>110</sup>

Despite political polarisation and the strong dominance of political parties in public life, CSOs continue to play an important role in democratic processes and public debate. They have established themselves as important sources of expertise, particularly in EU integration, the rule of law, anti-corruption, human rights, environmental protection, and public policy monitoring.<sup>111</sup> According to official data, 11,922 CSOs were registered in 2023, although available assessments indicate that only around 55% are regularly active.<sup>112</sup> Furthermore, a relatively small number of organisations carry out most policy analysis, advocacy, monitoring, and public participation activities, indicating a fragmented sector that remains highly dependent on a limited number of established organisations.<sup>113</sup>

At the same time, broader societal trends create additional pressures. The 2024 MCIC Trust Survey showed declining trust in CSOs compared to previous years, while confidence in key public institutions, including the judiciary, prosecution, and anti-corruption bodies, remained very low.<sup>114</sup> Trust in government stood at only 17%, significantly below the regional average according to the 2024 Balkan

<sup>110</sup> Konekt, National research report: community foundations in North Macedonia (2025) [https://konekt.org.mk/wp-content/uploads/2025/12/Project\\_Re-think\\_National\\_Research\\_Report\\_North-Macedonia\\_EN.pdf](https://konekt.org.mk/wp-content/uploads/2025/12/Project_Re-think_National_Research_Report_North-Macedonia_EN.pdf)

<sup>111</sup> Balkan Civil Society Development Network, analysis of the Council for Cooperation in North Macedonia <https://balkancsd.net/what-went-wrong-with-the-council-for-cooperation-of-the-government-with-civil-society-in-north-macedonia-2/>

<sup>112</sup> EU TACSO 3 Regional Assessment Report <https://tacso.eu/third-regional-assessment-report/>

<sup>113</sup> MCIC Monitoring Matrix 2023 Country Report for North Macedonia [https://balkancsd.net/novo/wp-content/uploads/2024/11/Country\\_Report\\_for\\_2023\\_MM\\_in\\_North\\_Macedonia.pdf](https://balkancsd.net/novo/wp-content/uploads/2024/11/Country_Report_for_2023_MM_in_North_Macedonia.pdf)

<sup>114</sup> MCIC Trust in Civil Society Survey 2024 [https://mcms.mk/images/docs/2025/Doverba\\_vo\\_gragjansko\\_opshestvo\\_2024\\_FV.pdf](https://mcms.mk/images/docs/2025/Doverba_vo_gragjansko_opshestvo_2024_FV.pdf)

Barometer. These trends contribute to growing public scepticism towards institutions and formal participation mechanisms.

Demographic decline and emigration further compound these challenges. The 2021 census recorded a population decrease of approximately 200,000 people compared with 2002, largely due to emigration, while recent surveys indicate high intentions to emigrate among highly educated citizens. For CSOs, which rely heavily on professional expertise in policy analysis, legal affairs, advocacy, and project management, these trends increasingly affect staff retention, organisational continuity, and the preservation of institutional knowledge.

At the same time, macroeconomic perspectives remain relatively stable, with inflation gradually under control. However, citizens continue to experience rising living costs due to global economic pressures and high public expenditure, raising increasing concerns about social protection and creating additional demand for civic engagement and community-based responses.

*“One of the most significant developments for civil society in the past three years has been the strengthening of organisational capacities, particularly in project design, fundraising, and the implementation of large-scale initiatives, including those related to the EU accession process. Many CSOs have become more professional and better equipped to manage complex projects and international partnerships. However, much of this potential remains underutilised.”*

Kil, Creativa / former minister, 2 June 2026.

## 2. Legal, Policy and Institutional Framework for CSOs

### Formal Framework

The EU Cluster 1 Screening Report explicitly positioned civil society as one of the three pillars for evaluating the functioning of democratic institutions in North Macedonia, alongside the electoral process and parliamentary functioning. While the overall legal, regulatory, and institutional framework for CSOs is considered established, further improvements are needed, particularly regarding sustainable financing mechanisms and the consistent implementation of existing provisions.<sup>115</sup> The formal framework includes the Law on Associations and Foundations, the Rules of Procedure of the Government (Articles 68 and 68-a), the Code of Good Practices for Civil Sector Participation in the Policymaking Process, the Regulatory Impact Assessment Methodology, and guidelines for ministries. The ENER system (Electronic National Electronic Register of Regulations) is designated as the mandatory platform for public consultations on legislation. North Macedonia formally recognises four forms of cooperation with civil society: informing, consultation, dialogue, and partnership, applicable throughout the policymaking process.<sup>116</sup>

However, the main challenge no longer lies in the absence of legal provisions but in their uneven implementation. Public consultations often take place at later stages of policymaking, and their quality varies considerably across institutions. In practice, the effectiveness of participation mechanisms frequently depends on the willingness and capacities of individual institutions rather than on fully institutionalised procedures.

<sup>115</sup> EU Cluster 1 Screening Report on North Macedonia [https://enlargement.ec.europa.eu/screening-report-north-macedonia\\_en](https://enlargement.ec.europa.eu/screening-report-north-macedonia_en)

<sup>116</sup> Code of Good Practices for Financing Civil Society <https://rcgo.mk/wp-content/uploads/2022/06/code-of-good-practices-for-financing-cs.pdf>

Financial sustainability also remains insufficiently addressed within the existing framework. Although strategic documents recognise CSOs' role, no comprehensive and predictable system of domestic public financing has yet been established. As a result, the sector continues to rely predominantly on international donor support.

*“If funding stopped tomorrow, CSOs will not cease to exist, but it will become much less visible and will no longer be able to engage in advocacy. Only network organisations that unite citizens around specific goals will remain. There will be no continuity, and we will only mobilise to show support for serious problems, such as protests against air pollution and similar issues.”*

KII, National Federation of Farmers, 4 June 2026.

Overall, North Macedonia can be characterised as a country with a relatively developed formal framework for civic participation but with persistent implementation gaps that continue to limit the full potential of civil society participation in public decision-making.<sup>117</sup>

### Practice: Enabling or Restrictive?

In practice, the environment for CSOs can be assessed as moderately enabling. Although formal mechanisms exist, including the Council for Cooperation between the Government and Civil Society as a platform linking CSOs and public institutions, cooperation is still largely driven by individual project-based initiatives rather than by fully institutionalised procedures. Personal and professional networks frequently facilitate communication and partnerships between institutions and CSOs.

However, the main challenge remains **the implementation of formal mechanisms**. The reform of the Law on Associations and Foundations (LAF) illustrates the slow pace of efforts to develop a more enabling environment for CSOs. Although the process has been ongoing and consultations with CSOs have been organised through various project-supported activities and working groups, the adoption of a comprehensive new legal framework remains delayed. [A new draft law](#) has since been advanced, aligning the sector with EU and Council of Europe standards through clearer rules on public support, CSO participation in decision-making, non-profit principles, transparency, and institutional cooperation with public authorities.<sup>118</sup>

Although ENER formally enables stakeholder participation throughout the legislative process, consultations are often conducted late, with limited feedback on submitted comments and inconsistent publication of supporting documents. In practice, transparency and access to information may also be politically influenced, particularly when institutions seek to accelerate legislative processes and avoid broader public debate.<sup>119</sup> The frequent use of shortened parliamentary procedures further limits meaningful participation, as illustrated by the September 2023 amendments to the Criminal Code, adopted through the so-called EU flag procedure without comprehensive public consultations.

*“As the most negative example, I would single out the failure to stop the amendments to the Criminal Code. Although civil society organisations were part of the working group for the new Criminal Code, the government decided to push through politically*

<sup>117</sup>Code of Good Practices for Financing Civil Society <https://rcgo.mk/wp-content/uploads/2022/06/code-of-good-practices-for-financing-cs.pdf>

<sup>118</sup> New draft Law on Associations and Foundations on ENER [https://ener.gov.mk/Default.aspx?item=pub\\_regulation&subitem=view\\_reg\\_detail&itemid=73921](https://ener.gov.mk/Default.aspx?item=pub_regulation&subitem=view_reg_detail&itemid=73921)

<sup>119</sup>In 2022, only 40% of draft laws were published on ENER, a sharp decline from 86% in 2018. By 2023 this had partially recovered to 51.4%, still leaving nearly half of all draft legislation outside the formal consultation mechanism MCIC Monitoring Matrix 2023 Country Report for North Macedonia [https://balkancsd.net/novo/wp-content/uploads/2024/11/Country\\_Report\\_for\\_2023\\_MM\\_in\\_North\\_Macedonia.pdf](https://balkancsd.net/novo/wp-content/uploads/2024/11/Country_Report_for_2023_MM_in_North_Macedonia.pdf)

*motivated changes via a fast-track procedure. The majority of citizens agree with the position of civil society organisations, but in that particular case, we were unsuccessful in making a change.”*

KII, All For Fair Trials, 3 June 2026.

Overall, the enabling environment is characterised less by a lack of rules than by inconsistencies in their application and by institutional commitment to participatory governance.

### Cooperation Between CSOs and Public Institutions

The Council for Cooperation between the Government and Civil Society formally serves as the institutional link between CSOs and public institutions. However, in practice, cooperation is often assessed as moderate and achieved through individual project-based initiatives rather than through fully institutionalised mechanisms. Personal and professional networks also continue to play an important role in facilitating cooperation. This model generally benefits larger, more experienced organisations with stronger capacities and established institutional contacts, while the participation of smaller, local CSOs remains more limited and less systematic.<sup>120</sup> Overall, cooperation between CSOs and public institutions remains more procedural and formal than genuinely influential in shaping decision-making processes. Nevertheless, despite the limitations of existing mechanisms, institutions increasingly recognise and rely on the expertise, analytical capacities, and public legitimacy of CSOs. Over time, civil society has established a distinct space within public policymaking and democratic dialogue, particularly in areas related to EU integration, where its contribution is increasingly difficult to overlook.

*CSOs are very active in organising events, conducting analyses, and issuing recommendations that accurately identify and offer solutions to key issues across almost every field in the country. There is communication with authorities at all levels, but that is where the story ends, there is no serious consideration by the institutions, nor any genuine effort to find solutions. The institutions still do not recognise the civil sector as a partner with whom they can work together to improve conditions.”*

KII, National Federation of Farmers, 4 June 2026.

North Macedonia has been one of the more engaged Open Government Partnership (OGP) members in the Western Balkans, now implementing its sixth national action plan alongside a third Open Parliament and a second Open Judiciary plan. The OGP process creates a structured co-creation space that partially compensates for the dysfunctions of the Council for Cooperation. However, the fifth action plan (2021–2023) produced no significant early results, and all six Open Judiciary commitments were simply carried over into the 2024–2026 cycle due to non-implementation.<sup>121122</sup>

### Public Perception and Trust

Public perceptions of CSOs in North Macedonia remain mixed. Although more than 60% of citizens believe that CSOs serve private interests or are influenced by foreign funding, a considerable share of citizens also recognises their societal contribution: 45.1% acknowledge their role in shaping public policy, while 44.8% recognise their contribution to addressing social issues. This suggests that citizens increasingly recognise the functional value of CSOs, even though concerns regarding their

<sup>120</sup>European Commission, North Macedonia 2025 Report [https://enlargement.ec.europa.eu/document/download/267b368e-6b55-4a42-bb72-6395593de4da\\_en?filename=north-macedonia-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/267b368e-6b55-4a42-bb72-6395593de4da_en?filename=north-macedonia-report-2025.pdf)

<sup>121</sup>North Macedonia OGP Results Report 2021–2023 <https://www.opengovpartnership.org/documents/north-macedonia-results-report-2021-2023/>

<sup>122</sup>North Macedonia OGP 2024–2026 Action Plan Review <https://www.opengovpartnership.org/documents/north-macedonia-2024-2026-action-plan-review/>



independence, legitimacy, and funding sources persist. Such perceptions continue to limit their capacity for broader public mobilisation and their role as trusted intermediaries between citizens and institutions.<sup>123</sup>

*“There is a still-persisting belief among some citizens that civil society organisations are part of foreign services and espionage. According to recent research, the civil sector has quite low public trust, mainly due to the perception that there is widespread corruption and money laundering within it.”*

KII, All For Fair Trials, 3 June 2026.

### 3. Strengths and Capacity Gaps of CSOs

#### Key Strengths

Despite numerous structural challenges, the CSO sector in North Macedonia has developed several important strengths over the past two decades. Continuous engagement in the EU accession process has contributed to the accumulation of policy expertise, institutional memory, and international networking capacities. A group of well-established organisations, particularly those active in EU integration, the rule of law, anti-corruption, media freedom, environmental protection, and social services, has become recognised as stakeholders whose analyses and recommendations are regularly referenced by European and international institutions.<sup>124</sup>

The sector has also gradually strengthened its organisational standards and accountability mechanisms through initiatives such as the Civil Society Resource Centre and the Civica Mobilitas Code of Good Practices and Compliance, which has been adopted by 115 organisations.<sup>125</sup> An important positive trend is **the growing territorial outreach of CSOs**. The proportion of organisations operating at the local level increased from 34% in 2021 to 45% in 2024, while organisations working at the regional level increased from 35% to 44%, indicating a gradual decentralisation of civic engagement beyond Skopje.<sup>126</sup>

Thematic diversity is another important asset: 26% of organisations work on environmental protection and climate change, 22% on education, research and innovation, 22% on youth and youth rights, 19% on social inclusion, and 16% on human rights. These figures demonstrate a broad civic presence across multiple policy areas.<sup>127</sup>

*“The strongest CSOs are distinguished by their expertise, credibility, and ability to build long-term relationships with citizens, institutions, and other stakeholders. They are not only capable of securing and implementing projects, but also of translating their knowledge into practical solutions, public influence, and sustainable community engagement. Strong organisations are able to attract, develop, and retain committed professionals and volunteers, while also investing in the next generation of civic leaders.”*

KII, Creativa / former minister, 2 June 2026.

#### Key Capacity Gaps

<sup>123</sup> MCIC Trust in Civil Society Survey 2024

[https://mcms.mk/images/docs/2025/Doverba\\_vo\\_gragjansko\\_opshestvo\\_2024\\_FV.pdf](https://mcms.mk/images/docs/2025/Doverba_vo_gragjansko_opshestvo_2024_FV.pdf)

<sup>124</sup> European Commission, North Macedonia 2025 Report

[https://enlargement.ec.europa.eu/document/download/267b368e-6b55-4a42-bb72-6395593de4da\\_en?filename=north-macedonia-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/267b368e-6b55-4a42-bb72-6395593de4da_en?filename=north-macedonia-report-2025.pdf)

<sup>125</sup> Civil Society Resource Centre, Organisational Capacity Self-Assessment Tool

<https://rcgo.mk/en/organisational-capacity-self-assessment-tool/>

<sup>126</sup> EU TACSO 3 Regional Assessment Report <https://tacso.eu/third-regional-assessment-report/>

<sup>127</sup> EU TACSO 3 Regional Assessment Report <https://tacso.eu/third-regional-assessment-report/>

Despite the growing professionalisation of the sector, several structural capacity gaps persist. The first relates to **fragmentation**. Although North Macedonia has a relatively large number of registered organisations, only around 2,000 are estimated to be genuinely active. Most organisations remain small: 62% have between one and ten staff members and volunteers, 12% have no personnel at all, and 21% operate with annual budgets below EUR 5,000. These patterns have remained largely unchanged over recent years, indicating limited organisational consolidation.<sup>128</sup> **Human resource sustainability** is another significant challenge. The predominance of short-term, project-based funding limits CSOs' ability to provide stable employment and develop long-term career paths. Particularly concerning is the decline in the participation of mid-career professionals, creating challenges for leadership succession, institutional continuity, and knowledge retention.<sup>129</sup> **Administrative and regulatory burdens** also disproportionately affect smaller organisations. Requirements related to anti-money laundering regulations and financial compliance have increased administrative workload, while limited internal capacity often makes it difficult for small CSOs to meet these obligations.<sup>130</sup> At the same time, organisations working in governance, anti-corruption, and democratic accountability continue to face a structural imbalance between societal demand and available resources. Although these areas are central to the EU accession process, they remain concentrated within a relatively small number of specialised organisations and receive limited domestic support.

North Macedonia does not have a weak CSO sector, but an unevenly developed one: the challenge is not the absence of expertise, capacity, or civic engagement, but their concentration within a limited number of established organisations, while many smaller and local CSOs remain insufficiently integrated into policymaking processes and sustainable support structures.

### Financial Sustainability

The financial sustainability challenge operates on three simultaneous levels: the near-total absence of domestic public funding, the collapse of private domestic philanthropy as a structural pillar, and the acute vulnerability created by over-dependence on a small number of international donors. Total state disbursements amounted to approximately 5 million EUR in both 2022 and 2023, while the 2024 budget rebalance further reduced funds allocated to civil society.<sup>131</sup> The structural risk of donor dependence was made dramatically visible by the 2025 USAID funding freeze. As of January 2025, there were 22 active USAID-funded projects in North Macedonia with a total estimated value of USD 74 million. For the period 2025–2028, nearly 37 million USD in planned funding was withdrawn, directly affecting 35 civil society organisations. At least 10 CSOs lost over half of their funding. Key areas affected include civic engagement and anti-corruption, democracy and rule of law, media literacy and youth empowerment, and social inclusion.

*“Financial sustainability is the number one problem that organisations face, and lately there has also been a loss of hope that things can be improved through civic activism, work in the sector is now seen merely as drawing a salary, without that desire to bring about change.”*

KII, All For Fair Trials, 3 June 2026.

*“Given the fact that civil society organisations in the country are predominantly based on grant funding, if that were to stop, fewer than 5 organisations would be able to continue operating.”*

KII, All For Fair Trials, 3 June 2026.

<sup>128</sup> DG ENEST Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027 2024 Assessment <https://rcgo.mk/wp-content/uploads/2025/08/report-macedonia.pdf>

<sup>129</sup> EU TACSO 3 Regional Assessment Report <https://tacso.eu/third-regional-assessment-report/>

<sup>130</sup> EU TACSO 3 Regional Assessment Report <https://tacso.eu/third-regional-assessment-report/>

<sup>131</sup> MCIC Monitoring Matrix Brief for North Macedonia 2024 [https://mcms.mk/images/docs/2025/MM\\_Brief\\_Report\\_for\\_North\\_Macedonia\\_-\\_2024.pdf](https://mcms.mk/images/docs/2025/MM_Brief_Report_for_North_Macedonia_-_2024.pdf)

Although a small number of CSOs have developed the capacity to generate resources by providing services to various stakeholders, this practice remains limited and insufficient to ensure long-term sustainability across the sector. Public funding opportunities are scarce, with government support mainly concentrated in specific areas such as culture, while private philanthropy remains underdeveloped. As a result, most CSOs continue to rely on project-based international funding. However, donor schemes often create additional barriers for smaller organisations, which frequently struggle to meet eligibility criteria and extensive administrative requirements. This limits their access to funding opportunities and their ability to invest in long-term institutional development, retain professional staff, and maintain continuous engagement with citizens, particularly at the local level. This dependence occasionally fuels public narratives questioning the independence and societal legitimacy of parts of the sector.<sup>132</sup>

The Creativa interviewee offers a more nuanced view that is analytically important: whether organisations survive without grants depends on whether they have built genuine civic roots that exist independently of project funding:

*“The real challenge is not whether grants exist, but whether organisations are capable of maintaining public engagement, social trust, and civic activism beyond project cycles. Those that succeed in doing so are likely to remain active even in a much more difficult funding environment. The organisations most at risk would be those that have become highly dependent on project funding and have gradually adopted a managerial or entrepreneurial culture rather than a civic one.”*

KII, Creativa / former minister, 2 June 2026.

#### 4. Citizen Participation in Public Life and Decision-Making

North Macedonia has a relatively well-developed formal architecture for citizen participation in policymaking. The Rules of Procedure of the Government, the Code of Good Practices, the Regulatory Impact Assessment Methodology, and the ENER platform provide mechanisms for informing, consultation, dialogue, and partnership between institutions and citizens. However, the practical implementation of these mechanisms remains dysfunctional. Public consultations are often organised late in the policymaking process, access to information is not always timely, and citizens and stakeholders rarely receive systematic feedback on how their contributions have been incorporated. This is reflected in low levels of public awareness of reform processes. According to regional surveys, only 23–24% of citizens in North Macedonia are aware of ongoing public administration reforms and their outcomes, which is among the lowest levels in the Western Balkans. This suggests that the main challenge is no longer the absence of participation mechanisms, but their limited visibility, predictability, and impact on public decision-making.<sup>133</sup>

*“It is often argued that citizen participation is insufficient, but this assessment should be viewed with caution. In many cases, lower engagement reflects a mismatch between CSOs' priorities and the issues citizens perceive as urgent and relevant to their daily lives. When civil society initiatives address concrete concerns such as environmental protection, urban development, mining projects, deforestation, local*

<sup>132</sup> Bertelsmann Transformation Index (BTI), North Macedonia Country Report <https://bti-project.org/en/reports/country-report/MKD>

<sup>133</sup> OECD, Public Administration in the Western Balkans 2024 [https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/03/public-administration-in-the-western-balkans-2024\\_07555c85/1ec4c18f-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/03/public-administration-in-the-western-balkans-2024_07555c85/1ec4c18f-en.pdf)

*infrastructure, living standards, wages, or other issues that directly affect communities, citizen participation can be substantial and highly mobilised.”*

Kil, Creativa / former minister, 2 June 2026.

According to a **2023 IRI survey**, only 3% of respondents strongly agreed that their government was accountable to the public, and only 31% agreed that the law equally applies to all people in North Macedonia, an all-time low at the time of the survey.<sup>134</sup> The MCIC Civic Engagement 2024 study provides the most recent domestic evidence on citizens’ actual engagement patterns. Nearly half of citizens do not know which forms of association would contribute to their needs. Among those who could identify representative structures, 23.1% believe churches and religious communities best represent their interests, while political parties were the least chosen at 5.3%. North Macedonia follows the broader post-socialist trend toward informal relations, with citizens mostly socialising privately, outside formal membership in groups or organisations.<sup>135</sup>

**Volunteerism data** reflects similar constraints. A global civic engagement report by Gallup ranked North Macedonia among the ten lowest-ranked countries for volunteering, with only 9% of citizens volunteering. A National Programme on Youth Volunteering has still not been adopted by the government, leaving each individual organiser responsible for establishing their own programme without national coordination or resourcing.<sup>136</sup> Civic participation has a pronounced geographic and ethnic dimension that formal mechanisms fail to address systematically. The National Youth Council of Macedonia’s Index of Social Inclusion of Young People at the Local Level 2023–2024 found that the average rating for youth involvement in local policy-making is approximately 30%, categorised as unsatisfactory. 17.5% of municipalities do not involve young people in public policy development at all. Since youth participation is the most institutionally incentivised form of local engagement, the deficit for general citizen participation is likely even more pronounced.<sup>137</sup>

## 5. Main Barriers to Civic Participation

### Legal and Institutional Barriers

- The main challenge is not restrictive legislation but the slow development and implementation of enabling mechanisms. Important issues remain unresolved, including a clearer framework for co-financing international projects, stronger legal guarantees for institutional dialogue mechanisms, and the establishment of transparent and predictable state funding arrangements.<sup>138</sup>
- Although consultation procedures and digital tools such as ENER are formally established, their application remains inconsistent. Public consultations are often organised late, access to information is not always timely, and institutions rarely provide systematic feedback on how stakeholders’ contributions have influenced final decisions.<sup>139</sup>
- The European Commission has repeatedly highlighted the extensive use of urgent and shortened parliamentary procedures, which reduce opportunities for meaningful

<sup>134</sup>IRI National Survey of North Macedonia, April–May 2023 <https://www.iri.org/resources/national-survey-of-north-macedonia-april-may-2023/>

<sup>135</sup>MCIC Civic Engagement 2024 Study [https://mcms.mk/images/docs/2025/Gragjanska\\_vluchenost.pdf](https://mcms.mk/images/docs/2025/Gragjanska_vluchenost.pdf)

<sup>136</sup>Global Civic Engagement Report, CAF [https://www.cafonline.org/docs/default-source/inside-giving/wgi/wgi\\_2024\\_report.pdf](https://www.cafonline.org/docs/default-source/inside-giving/wgi/wgi_2024_report.pdf)

<sup>137</sup>National Youth Council of Macedonia, Index of Social Inclusion of Young People at the Local Level 2023–2024 [https://www.nms.org.mk/wp-content/uploads/2024/10/Indeks-za-socijalna-inkluzija\\_ENG\\_Final.pdf](https://www.nms.org.mk/wp-content/uploads/2024/10/Indeks-za-socijalna-inkluzija_ENG_Final.pdf)

<sup>138</sup>EU Cluster 1 Screening Report on North Macedonia [https://enlargement.ec.europa.eu/screening-report-north-macedonia\\_en](https://enlargement.ec.europa.eu/screening-report-north-macedonia_en)

<sup>139</sup>MCIC Monitoring Matrix 2023 Country Report [https://balkancsd.net/novo/wp-content/uploads/2024/11/Country\\_Report\\_for\\_2023\\_MM\\_in\\_North\\_Macedonia.pdf](https://balkancsd.net/novo/wp-content/uploads/2024/11/Country_Report_for_2023_MM_in_North_Macedonia.pdf)

participation by both CSOs and citizens and weaken the overall quality and predictability of policymaking.<sup>140</sup>

- North Macedonia remains among the European countries with a significant number of SLAPP cases. The absence of a dedicated anti-SLAPP framework continues to expose journalists, human rights defenders, and CSOs to strategic litigation that may discourage public oversight and accountability activities.

### Financial Barriers

- State funding constitutes approximately 3% of total CSO revenues, against the government's committed target of 30%, leaving organisations almost entirely dependent on international grants. The 2024 budget rebalance further reduced the already negligible state allocations for civil society.<sup>141</sup>
- Municipalities concentrate their limited CSO funding primarily on sports associations, leaving advocacy and social services organisations without meaningful domestic public support at the local level.
- The 2025 USAID funding freeze created an acute funding crisis: 35 organisations were directly affected, at least 10 lost more than half their funding, and approximately 37 million USD in planned 2025–2028 support was withdrawn. With the USAID withdrawal, EU, Swiss, and Norwegian donors have become increasingly important, but gaps in coverage remain.<sup>142</sup>

### Societal Barriers

- The trust deficit documented in the MCIC Trust Survey represents a significant societal barrier. When more than 60% of citizens perceive CSOs as serving private interests, their ability to mobilise broader public support becomes constrained. This challenge is reinforced by the politicisation of civil society, as engagement with certain organisations is often viewed through partisan lenses, making CSOs more vulnerable to political labelling and discouraging politically non-aligned citizens from participating in civic initiatives.<sup>143</sup>
- North Macedonia has the lowest awareness of public administration reforms among all Western Balkans countries surveyed (23–24%), indicating a fundamental information and communication gap between institutions and citizens.<sup>144</sup>
- Participation barriers are not equally distributed across society. Young people continue to face challenges related to emigration, limited long-term engagement, and a growing preference for informal and digital forms of participation. Gender inequalities persist, particularly at the local level. Minority and marginalised communities, including Roma communities, continue to face structural barriers related to economic vulnerability, territorial disparities, language accessibility, and limited access to information, which constrain their meaningful participation in public life.<sup>145</sup>

<sup>140</sup> 2025 Rule of Law Report – Country Chapter on North Macedonia  
[https://commission.europa.eu/document/download/ede31053-efc6-4dd0-89ed-c9224f7eeb70\\_en?filename=2025+Rule+of+Law+Report+-+Country+Chapter+North-Macedonia.pdf](https://commission.europa.eu/document/download/ede31053-efc6-4dd0-89ed-c9224f7eeb70_en?filename=2025+Rule+of+Law+Report+-+Country+Chapter+North-Macedonia.pdf)

<sup>141</sup> MCIC Monitoring Matrix Brief for North Macedonia 2024  
[https://mcms.mk/images/docs/2025/MM\\_Brief\\_Report\\_for\\_North\\_Macedonia\\_-\\_2024.pdf](https://mcms.mk/images/docs/2025/MM_Brief_Report_for_North_Macedonia_-_2024.pdf)

<sup>142</sup> MCIC, Financial Impact of USAID's Funding Termination on Macedonian Civil Society  
[https://mcms.mk/images/docs/2025/Impact\\_of\\_USAIDs\\_funding\\_termination\\_f.pdf](https://mcms.mk/images/docs/2025/Impact_of_USAIDs_funding_termination_f.pdf)

<sup>143</sup> MCIC Trust in Civil Society Survey 2024  
[https://mcms.mk/images/docs/2025/Doverba\\_vo\\_gragjansko\\_opshestvo\\_2024\\_FV.pdf](https://mcms.mk/images/docs/2025/Doverba_vo_gragjansko_opshestvo_2024_FV.pdf)

<sup>144</sup> OECD, Public Administration in the Western Balkans 2024  
[https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/03/public-administration-in-the-western-balkans-2024\\_07555c85/1ec4c18f-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/03/public-administration-in-the-western-balkans-2024_07555c85/1ec4c18f-en.pdf)

<sup>145</sup> Roma Inclusion Strategy 2022–2030  
<https://cms.mtsp.gov.mk/content/pdf/2022/Strategy%20for%20inclusion%20of%20Roma%202022-2030%20final%20version.pdf>

- Demographic pressures caused by emigration and population decline reduce the pool of qualified civic professionals and erode the social base for sustained participatory democracy, particularly in regions outside Skopje.

## 6. Priority Actions to Strengthen CSOs and Improve Civic Participation

### Enact the New Law on Associations and Foundations Without Further Delay

- The most important is the adoption of the new Law on Associations and Foundations, which must: give the Council for Cooperation a statutory basis in law rather than by government decision; establish transparent, needs-based state funding criteria; and create a legal framework for co-financing international projects.<sup>146</sup> The process should be fully inclusive, with all relevant stakeholders consulted at each stage.<sup>147</sup>
- Once adopted, the law must include the reform of state funding allocation as a central component, addressing the current situation where criteria are applied non-transparently, and some recipient organisations were established less than three years ago.<sup>148</sup>

### Establish the Independent Fund for Support and Development of Civil Society

- The establishment of the independent Fund for Civil Society Development, as committed in the government's Strategy 2022–2024 and explicitly referenced in the Screening Report benchmarks, must be treated as a standalone priority rather than a footnote to the Law on Associations and Foundations. The government's target of 30% state funding as a share of total CSO revenues remains unrealised; any substantive progress would materially reduce donor dependency and improve organisational stability.<sup>149</sup>
- In parallel, municipal funding frameworks must be reformed to extend support beyond sports associations and toward the advocacy, social services, and civic engagement organisations that are structurally excluded from domestic public funding.

### Reform and Enforce the Public Consultation System

- Making annual consultation plans mandatory for all ministries, imposing legally binding feedback obligations on institutions receiving public comments, and restricting the use of fast-track parliamentary procedures for legislation affecting fundamental rights and the enabling environment for civil society. Currently, no institution prepares and publishes annual consultation plans, meaning key stakeholders cannot prepare in time to participate meaningfully.<sup>150</sup>

*"Openness on the part of the government to genuinely consider civil society organisations as serious partners."*

KII, National Federation of Farmers, 4 June 2026.

- Participation should begin at the earliest stage of policy design, with adequate time for quality response, and institutions should be required to publish minutes from consultative processes explaining how public input was or was not incorporated into final legislation.

<sup>146</sup>EU Cluster 1 Screening Report on North Macedonia [https://enlargement.ec.europa.eu/screening-report-north-macedonia\\_en](https://enlargement.ec.europa.eu/screening-report-north-macedonia_en)

<sup>147</sup>ENER – Draft Law on Associations and Foundations [https://ener.gov.mk/Default.aspx?item=pub\\_regulation&subitem=view\\_reg\\_detail&itemid=73921](https://ener.gov.mk/Default.aspx?item=pub_regulation&subitem=view_reg_detail&itemid=73921)

<sup>148</sup>MCIC Monitoring Matrix Brief for North Macedonia 2024 [https://mcms.mk/images/docs/2025/MM\\_Brief\\_Report\\_for\\_North\\_Macedonia\\_-\\_2024.pdf](https://mcms.mk/images/docs/2025/MM_Brief_Report_for_North_Macedonia_-_2024.pdf)

<sup>149</sup>EU Cluster 1 Screening Report on North Macedonia [https://enlargement.ec.europa.eu/screening-report-north-macedonia\\_en](https://enlargement.ec.europa.eu/screening-report-north-macedonia_en)

<sup>150</sup>MCIC Monitoring Matrix 2023 Country Report [https://balkancsd.net/novo/wp-content/uploads/2024/11/Country\\_Report\\_for\\_2023\\_MM\\_in\\_North\\_Macedonia.pdf](https://balkancsd.net/novo/wp-content/uploads/2024/11/Country_Report_for_2023_MM_in_North_Macedonia.pdf)



### Adopt a SLAPP Protection Mechanism

- The European Parliament's 2025 report calls on the authorities to adopt a legal framework that effectively protects journalists, human rights defenders, environmental activists, and other stakeholders from strategic lawsuits against public participation (SLAPPs), and to implement the provisions of the EU Anti-SLAPP Directive. Given North Macedonia's position among the top ten European countries for SLAPP cases, this is both a rule-of-law and a civic space priority with direct operational consequences for organisations engaged in accountability work.

### Address the Post-USAID Funding Crisis

- International donors, the European Union, Switzerland, and Norway in particular, should coordinate to fill the gaps left by the 2025 USAID funding termination, prioritising multi-year institutional grants over project-based support. This is essential for organisations that lost more than half of their funding and are at risk of permanent closure.<sup>151</sup>
- Alongside funding support, international partners and domestic public figures should explicitly counter the negative information campaigns targeting USAID programme implementers, which have compounded the reputational damage and public trust deficit.

### Rebuild Civic Mission and Strengthen Sector Cohesion

- Invest in inter-CSO cooperation and collective action mechanisms to overcome the fragmentation that prevents civil society from sustaining pressure on institutions beyond individual project cycles.

*"Unity and cooperation, as there is a perception that civil society organizations are now working solely for financial gain. We need to ask ourselves once again why we do this work."*

KII, All For Fair Trials, 3 June 2026.

### Invest in Civic Education and Citizen Awareness

- Launch a sustained public awareness campaign, led jointly by the civil sector and supported by public institutions, to explain to citizens what civil society does, what it cannot substitute for, and how civic participation produces tangible change.

*"Educating citizens and encouraging them to be more active. A campaign should be launched by the civil sector to explain to citizens what it means to be civically active, that is, that we need to find the strength to bring about change ourselves, rather than waiting for someone else to do it for us."*

KII, All For Fair Trials, 3 June 2026.

## 7. Conclusion

The North Macedonia context generates four key insights for the ROOT WB project. The central challenge is not weak expertise but **weak institutional anchorage**. The legal framework and consultation mechanisms are largely in place. CSOs have accumulated significant expertise, particularly in EU integration, with a focus on the Rule of Law. However, the findings of this assessment suggest that the country's main challenge is no longer the absence of structures, but their **uneven**

<sup>151</sup>MCIC, Financial Impact of USAID's Funding Termination on Macedonian Civil Society  
[https://mcms.mk/images/docs/2025/Impact\\_of\\_USAIDs\\_funding\\_timplementation\\_andtermination\\_f.pdf](https://mcms.mk/images/docs/2025/Impact_of_USAIDs_funding_timplementation_andtermination_f.pdf)

**implementation and insufficient institutionalisation.** This underlines the need for ROOT WB to focus on the structural conditions, legal, financial, and political, that enable CSOs to function sustainably, rather than solely on organisational capacity building. At the same time, cooperation between institutions and civil society remains more **formal** than transformative. Although various participation mechanisms exist, they continue to rely on political priorities and project-based initiatives, rather than on predictable institutional. communication. ROOT WB can therefore play a role in advocating for stronger implementation of cooperation mechanisms. The USAID funding crisis offers an important systemic lesson extending beyond North Macedonia. The simultaneous loss of funding demonstrated that the cumulative impact on human capital, organisational networks, and public credibility can be far greater than the immediate financial losses themselves. This further highlights the need for more sustainable domestic funding mechanisms and diversified support structures for civil society. The **trust deficit** cannot be resolved through better communication alone. Although citizens recognise the expertise and societal contribution of CSOs, political polarisation and persistent public scepticism continue to limit their mobilisation potential. Rebuilding trust requires locally embedded partnerships, tangible public benefits, and opportunities for direct citizen engagement. In this regard, ROOT WB is particularly well-positioned to strengthen civic ecosystems by integrating smaller and less visible organisations in the bigger picture, promoting inclusive participation, and creating sustainable spaces for dialogue among citizens, institutions, and civil society actors.

## COUNTRY CONTEXT: ALBANIA

### 1. Main Political and Social Developments Affecting Civil Society and Civic Participation

Over the last five years, Albania has experienced several political and social developments that have shaped the operating environment for civil society organisations and the quality of civic participation. Albania's progress in the EU accession process, including the opening of accession negotiations, has created new opportunities for CSOs to contribute to policy discussions, monitor reforms, and advocate for greater transparency, accountability, and democratic governance. Civil society organisations have increasingly engaged in monitoring reforms related to the rule of law, anti-corruption measures, public administration, and local governance.<sup>152153</sup>

*"The most significant change has been the increased involvement of civil society in public consultations and EU integration processes, although the influence of these consultations on final decisions remains limited."*

KII, Executive Director, Chamber of Commerce and Industry of Tirana, 29 May 2026.

*"The growing focus on EU integration and international cooperation has increased opportunities for civil society participation, networking, and access to funding, particularly in areas related to economic development, youth employment, and innovation."*

KII, Executive Director, Union Camere of Puglia in Tirana, 1 June 2026.

Public trust in political institutions remains relatively low, particularly among young people. This has encouraged many citizens to engage through informal initiatives, grassroots movements, and community-based actions rather than through traditional political channels. Environmental protection, urban planning, protection of public spaces, social justice, and local development have become the most common issues around which citizens mobilise. These issue-based mobilisations often generate higher participation levels than formal consultation processes, reflecting a broader pattern across the Western Balkans.<sup>154155</sup> Digital platforms have changed the way people participate in public life. Social media is increasingly used to raise awareness, organise campaigns, and engage communities, especially among younger generations. However, online engagement does not always translate into long-term civic involvement or meaningful participation in formal decision-making processes. Concerns related to political polarisation, media independence, and the spread of misinformation continue to affect public trust, public debate, and citizen engagement.<sup>156</sup>

The continued migration of young people and skilled professionals represents one of the most significant structural challenges for Albanian civil society. This has reduced the pool of active citizens available for community initiatives, weakened civic engagement in some local communities, and created difficulties for CSOs in recruiting and retaining volunteers and staff. Civic participation opportunities also vary sharply across regions, with organisations and citizens in Tirana and larger urban centres having substantially greater access to resources, networks, and participation mechanisms than those in rural areas.<sup>157158</sup> Despite these challenges, youth organisations, volunteer

<sup>152</sup> European Commission, Albania Progress Reports [https://neighbourhood-enlargement.ec.europa.eu/albania-report\\_en](https://neighbourhood-enlargement.ec.europa.eu/albania-report_en)

<sup>153</sup> Open Government Partnership, Albania <https://www.opengovpartnership.org/members/albania>

<sup>154</sup> Freedom House, Nations in Transit: Albania <https://freedomhouse.org/country/albania/nations-transit>

<sup>155</sup> Regional Cooperation Council, Balkan Barometer <https://www.rcc.int/balkanbarometer>

<sup>156</sup> CIVICUS Monitor, Albania country profile <https://monitor.civicus.org/country/albania>

<sup>157</sup> Albanian Institute of Statistics (INSTAT) <https://www.instat.gov.al>

<sup>158</sup> Friedrich Ebert Stiftung, Youth Study Southeast Europe <https://library.fes.de/youth-studies>

groups, and local initiatives continue to demonstrate strong motivation to address community issues and promote positive social change. The growing involvement of young people in volunteering programmes, Erasmus+, the European Solidarity Corps, and community-based initiatives has contributed to the emergence of a more active generation of young citizens committed to civic engagement. Overall, civic participation in Albania is becoming increasingly issue-driven, community-oriented, and digitally mediated, while CSOs continue to play an important role in promoting democratic values, citizen participation, social inclusion, and public accountability.<sup>159</sup>

All three interviewees are Executive Directors of organisations based in Tirana. While this limits geographic diversity, it is consistent with the desk research finding that Albanian civil society is structurally concentrated in the capital. Their perspectives reflect the most institutionalised and professionally developed segment of the sector. Organisations in rural areas and smaller municipalities — which the desk research identifies as most underserved — are not represented in the KII sample, a limitation worth noting in the methodology section.

## 2. Legal, Policy and Institutional Framework for CSOs

### Formal Framework

Albania has a relatively favourable legal framework for the establishment and operation of civil society organisations. Freedom of association is guaranteed by law, and the registration process for CSOs is generally straightforward. In recent years, several policy documents and strategic frameworks have acknowledged the role of civil society in democratic governance, citizen participation, and the EU integration process. The establishment of mechanisms such as the National Council for Civil Society has provided a formal platform for dialogue between public institutions and civil society actors. **The Agency for Support of Civil Society (ASCS)** provides an institutional framework for public funding and capacity support to the sector.<sup>160161</sup>

### Practice: Enabling or Restrictive?

Despite this generally enabling framework, **implementation remains the defining challenge**. While mechanisms for public consultation exist, many CSOs report that their contributions are not always reflected in final decisions. Participation is often limited to consultation rather than genuine involvement in policy design, implementation, and monitoring.

*"CSOs have gained greater access to consultation processes, but their influence on final policy decisions remains uneven. Their impact is strongest when they provide expertise, evidence-based recommendations, and represent broad stakeholder interests."*

KII, Executive Director, DARC, 2 June 2026.

The EU accession process has encouraged public institutions to strengthen cooperation with civil society, but progress remains uneven across sectors and levels of government.<sup>162163</sup> A persistent structural gap is the **limited reach of public funding**. Public funding opportunities for civil society exist but remain insufficient to support the long-term sustainability of organisations. As a result, many CSOs continue to depend heavily on international donor support, creating structural vulnerabilities when donor priorities shift.

<sup>159</sup>European Youth Portal – Youth participation and volunteering data <https://youth.europa.eu>

<sup>160</sup>Agency for Support of Civil Society (ASCS) <https://www.amshc.gov.al>

<sup>161</sup>National Resource Centre for Civil Society in Albania <https://resourcecentre.al>

<sup>162</sup>OECD SIGMA Programme, Albania governance and public administration reports <https://www.sigmaweb.org>

<sup>163</sup>European Centre for Not-for-Profit Law (ECNL), Civic Space Reports <https://ecnl.org>

*"Only a relatively small number of well-established organizations with diversified funding sources and strong institutional capacities would be able to continue operating effectively in the long-term."*

KII, Executive Director, Chamber of Commerce and Industry of Tirana, 29 May 2026.

The combination of donor dependency and inconsistent public funding leaves much of the sector in a permanent project cycle with limited capacity for long-term institutional development.<sup>164165</sup>

### Cooperation Between CSOs and Public Institutions

Cooperation between public institutions and civil society varies significantly across sectors and municipalities. Some local governments actively engage CSOs in community development initiatives and policy discussions, while others maintain only formal, procedural relationships. Organisations based in Tirana generally have greater access to decision-makers, funding opportunities, and consultation processes compared to those operating in smaller municipalities and rural areas. This geographic disparity in the quality of cooperation is one of the most persistent structural inequalities within the Albanian civil society landscape.<sup>166167</sup>

### Public Perception and Trust

Public perception of CSOs is mixed. Citizens often recognise the important role of civil society in supporting communities, promoting human rights, advocating for vulnerable groups, and providing services. However, there is also a perception that some organisations are **donor-driven and have limited connection** with local communities. This perception is reinforced by the sector's heavy dependence on international funding and the relative invisibility of many organisations outside project implementation periods. Strengthening transparency, accountability, and community engagement remains essential for increasing public trust and reinforcing the legitimacy of civil society organisations in Albania.<sup>168169</sup>

## 3. Strengths and Capacity Gaps of CSOs

### Key Strengths

- Substantial accumulated expertise in EU project implementation and international partnerships at both national and regional levels, creating credibility with institutional stakeholders and access to EU funding frameworks.<sup>170</sup>
- Strong community engagement and issue-based mobilisation capacity, particularly around environmental protection, urban planning, social justice, and local development, demonstrating that Albanian civil society can activate citizens around tangible community concerns.
- Growing youth activism and a more active generation of young citizens developed through Erasmus+, the European Solidarity Corps, volunteering programmes, and community-based initiatives — representing the sector's most important long-term human capital development trend.<sup>171</sup>

<sup>164</sup>Partners Albania for Change and Development, Civil Society Development Reports <https://partnersalbania.org>

<sup>165</sup>Balkan Civil Society Development Network (BCSDN), Monitoring Matrix on Enabling Environment for Civil Society Development <https://www.balkancsd.net>

<sup>166</sup>Institute for Democracy and Mediation (IDM Albania), publications and research <https://idmalbania.org>

<sup>167</sup>Westminster Foundation for Democracy (WFD) Albania <https://www.wfd.org>

<sup>168</sup>Transparency International, Corruption Perceptions Index <https://www.transparency.org/en/cpi>

<sup>169</sup>World Bank Worldwide Governance Indicators <https://info.worldbank.org/governance/wgi>

<sup>170</sup>European Commission, Albania Progress Reports [https://neighbourhood-enlargement.ec.europa.eu/albania-report\\_en](https://neighbourhood-enlargement.ec.europa.eu/albania-report_en)

<sup>171</sup>European Youth Portal – Youth participation and volunteering data <https://youth.europa.eu>

- Sector-level infrastructure: the Agency for Support of Civil Society (ASCS), the National Resource Centre for Civil Society, and Partners Albania for Change and Development provide institutional capacity support and funding access mechanisms for the sector.<sup>172173</sup>

### Key Capacity Gaps

- Strategic planning, organisational development, and long-term sustainability: many CSOs lack the internal capacity for structured strategic planning, focusing instead on responding to available funding opportunities rather than building sustained programmes around community needs.
- Human resource instability: limited staff capacity, difficulties retaining qualified professionals, and high turnover due to short-term contracts and limited financial resources are widespread. Leadership succession and institutional memory present additional challenges, as many organisations rely heavily on a small number of key individuals for management and decision-making.<sup>174</sup>
- Digitalisation, monitoring, and evaluation: many organisations face challenges related to communication strategies, monitoring and evaluation systems, and the measurement of social impact. Smaller CSOs often lack the technical capacity required to collect and analyse data, demonstrate results, and meet increasingly complex donor requirements.
- Volunteer management: many organisations depend on project-based volunteers without structured systems for recruitment, training, retention, and recognition. This limits the long-term contribution of volunteering to organisational capacity and community engagement.
- Geographic and size disparities: the divide between larger, well-established organisations (predominantly in Tirana) and smaller community-based CSOs in rural areas is one of the most entrenched structural inequalities in the sector, affecting access to funding, networks, training, and institutional support.

### Financial Sustainability

Financial sustainability is one of the most pressing concerns for Albanian civil society. The majority of organisations rely heavily on international donors and project-based funding. Access to domestic funding remains limited, while private sector support, philanthropy, and income-generating opportunities for CSOs are still underdeveloped. Many organisations struggle to maintain activities between projects and often operate without sufficient core funding to support long-term development. The lack of diversified funding sources makes CSOs structurally vulnerable to changes in donor priorities and funding cycles — a risk made visible in other regional contexts, such as the 2025 USAID funding freeze in North Macedonia, where analogous dependency structures produced acute sector-wide crises.<sup>175176</sup>

## 4. Citizen Participation in Public Life and Decision-Making

Citizens in Albania participate in public life through elections, public consultations, community initiatives, volunteering activities, advocacy campaigns, local government consultations, and online engagement. Social media has become an increasingly important platform for expressing opinions, raising awareness, and mobilising citizens around specific issues, particularly among young people. However, this engagement is often issue-based and short-term rather than sustained civic

<sup>172</sup>Agency for Support of Civil Society (ASCS) <https://www.amshc.gov.al>

<sup>173</sup>National Resource Centre for Civil Society in Albania <https://resourcecentre.al>

<sup>174</sup>UNDP Albania <https://www.undp.org/albania>

<sup>175</sup>Partners Albania for Change and Development, Civil Society Development Reports <https://partnersalbania.org>

<sup>176</sup>Balkan Civil Society Development Network (BCSDN), Monitoring Matrix <https://www.balkancsd.net>



involvement in formal decision-making processes.<sup>177178</sup> Participation is generally stronger when citizens are directly affected by local challenges — environmental concerns, public infrastructure, urban development, education, or social services.

*"Citizens engage mainly through volunteering, local initiatives, and issue-based campaigns. Young people and active community members tend to participate the most, while rural populations, marginalized groups, and citizens with limited access to information are often underrepresented."*

KII, Executive Director, Chamber of Commerce and Industry of Tirana, 29 May 2026.

Community-based initiatives, volunteer actions, and local advocacy campaigns often attract higher levels of engagement than formal consultation processes. However, many citizens remain sceptical about the impact of their participation on public decision-making. Public consultations are often perceived as procedural exercises rather than meaningful opportunities to influence policies and decisions, a pattern consistently documented across the Western Balkans region.<sup>179180</sup>

Participation levels vary significantly among different population groups and regions. Women, young people, rural communities, persons with disabilities, Roma and Egyptian communities, and other vulnerable groups face additional barriers to participation, including limited access to information, resources, and decision-making opportunities. Civic engagement opportunities are substantially more accessible in urban areas, while rural communities experience weaker civic infrastructure and fewer participation mechanisms. This geographic and demographic unevenness is one of the defining structural features of civic participation in Albania. Positive examples include growing youth engagement through Erasmus+, the European Solidarity Corps, local activism, and civic education programmes. Volunteering is becoming increasingly popular, particularly among young people, but has not yet been fully institutionalised as a long-term mechanism for civic engagement and community development. The gap between the enthusiasm of individual volunteers and the institutional infrastructure to sustain their engagement over time remains one of the key structural deficits in Albanian civic participation.<sup>181182</sup>

## 5. Main Barriers to Civic Participation

### Institutional Barriers

- Consultation mechanisms are not always effective, and citizens often feel that their opinions have little influence on public decisions. Public consultations are sometimes perceived as formal procedures rather than genuine participation opportunities, discouraging engagement in policymaking processes.<sup>183</sup>

*"The first barrier is limited trust that participation will lead to tangible change. The second is the lack of consistent and accessible mechanisms that allow citizens to engage meaningfully in public decision-making."*

KII, Executive Director, Union Camere of Puglia in Tirana, 1 June 2026.

- Bureaucratic procedures, administrative burdens, and limited responsiveness from some public institutions further reduce opportunities for effective participation. The quality of

<sup>177</sup>Open Government Partnership, Albania <https://www.opengovpartnership.org/members/albania>

<sup>178</sup>CIVICUS Monitor, Albania country profile <https://monitor.civicus.org/country/albania>

<sup>179</sup>Regional Cooperation Council, Balkan Barometer <https://www.rcc.int/balkanbarometer>

<sup>180</sup>OECD SIGMA Programme, Albania governance reports <https://www.sigmaweb.org>

<sup>181</sup>European Youth Portal – Youth participation and volunteering data <https://youth.europa.eu>

<sup>182</sup>Friedrich Ebert Stiftung, Youth Study Southeast Europe <https://library.fes.de/youth-studies>

<sup>183</sup>OECD SIGMA Programme, Albania governance reports <https://www.sigmaweb.org>

participatory governance varies sharply between municipalities and sectors, creating unequal civic space depending on geographic location.

- Uneven geographic distribution of cooperation quality: organisations and citizens in Tirana have significantly better access to decision-makers and consultation processes than those in smaller municipalities and rural areas, reflecting a structural concentration of civic infrastructure in the capital.<sup>184</sup>

### Financial Barriers

- Many CSOs lack sustainable funding and struggle to maintain long-term programmes and community engagement activities. Limited public funding and high dependence on donor-supported projects reduce the ability of organisations to operate consistently and strategically.<sup>185</sup>
- Smaller organisations, particularly those operating outside major urban centres, face greater difficulties in accessing funding opportunities, partnerships, and capacity-building programmes, compounding existing inequalities within the sector.

### Societal Barriers

- Low trust in institutions, political polarisation, limited civic education, and widespread perceptions of inefficiency in public administration contribute to citizen disengagement. Many citizens feel that their involvement is unlikely to influence public decisions, leading to apathy and low participation levels.<sup>186187</sup>
- Limited access to information about consultation processes, civic initiatives, and participation opportunities further restricts engagement, particularly among citizens in rural and remote areas.
- Youth migration continues to reduce the number of active young citizens involved in community initiatives and civic life. The loss of educated and motivated young people weakens civic leadership pipelines and affects the long-term sustainability of civil society organisations in affected communities.<sup>188</sup>

### Barriers for Marginalised Groups

- Participation barriers are more pronounced for vulnerable and underrepresented groups, including women, persons with disabilities, Roma and Egyptian communities, rural populations, and young people with fewer opportunities. These groups face additional social, economic, and structural obstacles that limit their involvement in public life and decision-making processes.
- Some local authorities face capacity constraints that affect their ability to implement inclusive and meaningful participatory processes, particularly in rural communities and smaller municipalities where administrative resources and expertise are limited.

## 6. Priority Actions to Strengthen CSOs and Improve Civic Participation

### Strengthen Public Consultation and Participatory Governance

- Improve the quality and effectiveness of public consultation processes, ensuring that citizen and CSO contributions are meaningfully considered in policymaking and that institutions are

<sup>184</sup>Institute for Democracy and Mediation (IDM Albania), publications <https://idmalbania.org>

<sup>185</sup>Partners Albania for Change and Development, Civil Society Development Reports <https://partnersalbania.org>

<sup>186</sup>Freedom House, Nations in Transit: Albania <https://freedomhouse.org/country/albania/nations-transit>

<sup>187</sup>Transparency International, Corruption Perceptions Index <https://www.transparency.org/en/cpi>

<sup>188</sup>Albanian Institute of Statistics (INSTAT) <https://www.instat.gov.al>

required to provide written feedback on how input was incorporated or why it was not adopted.<sup>189190</sup>

*"I would introduce stronger civic education and participation mechanisms for young people, ensuring that they have regular opportunities to contribute to decisions that affect their communities and future."*

KII, Executive Director, DARC, 2 June 2026.

- Expand access to information, promote open government practices, and strengthen digital participation tools to support citizen involvement in decision-making processes, with particular attention to accessibility for rural and marginalised communities.
- Build capacity within local authorities to implement inclusive and meaningful participatory processes, particularly in rural municipalities and smaller communities where administrative resources and expertise are limited.

### Increase Sustainable Funding for Civil Society

- Increase sustainable domestic funding opportunities for civil society organisations, particularly for grassroots and community-based initiatives operating in rural and underserved areas. Public funding should support long-term organisational development rather than exclusively project-based delivery.<sup>191</sup>
- Encourage diversification of funding sources, including public funding, private sector partnerships, philanthropy, and social entrepreneurship initiatives, to reduce structural vulnerability to changes in international donor priorities and funding cycles.

### Build Organisational Capacity and Reduce Sector Inequalities

- Support organisational development programmes covering leadership skills, strategic planning, digital capacities, monitoring and evaluation systems, and long-term planning, with particular focus on smaller and rural organisations that are most disadvantaged in the current funding landscape.<sup>192193</sup>
- Establish structured and sustainable volunteer management systems within CSOs, covering recruitment, training, retention, and recognition mechanisms that enable volunteering to function as a long-term civic engagement pathway rather than a project-bound activity.

### Invest in Civic Education and Youth Participation

- Prioritise investment in civic education, volunteering programmes, and youth participation initiatives to strengthen democratic culture and increase public involvement in local and national decision-making. Active citizenship education from an early age is essential for building a sustained civic engagement base.<sup>194195</sup>
- Expand Erasmus+ and European Solidarity Corps opportunities and ensure that skills and networks gained through international mobility programmes are channelled back into local community engagement, using these programmes as a pipeline for civic leadership development.

### Promote Inclusive Participation for Marginalised Groups

- Give dedicated attention to promoting the participation of underrepresented and vulnerable groups — including women, young people, persons with disabilities, Roma and Egyptian

<sup>189</sup>OECD SIGMA Programme, Albania governance reports <https://www.sigmaweb.org>

<sup>190</sup>Open Government Partnership, Albania <https://www.opengovpartnership.org/members/albania>

<sup>191</sup>Agency for Support of Civil Society (ASCS) <https://www.amshc.gov.al>

<sup>192</sup>Partners Albania for Change and Development, Civil Society Development Reports <https://partnersalbania.org>

<sup>193</sup>Balkan Civil Society Development Network (BCSDN), Monitoring Matrix <https://www.balkancsd.net>

<sup>194</sup>Friedrich Ebert Stiftung, Youth Study Southeast Europe <https://library.fes.de/youth-studies>

<sup>195</sup>European Youth Portal <https://youth.europa.eu>

communities, and rural populations — ensuring equal access to participation opportunities and decision-making processes as a prerequisite for building an inclusive and representative civic environment.

- Build stronger partnerships between public institutions, civil society organisations, educational institutions, media, private sector actors, and local communities to create greater trust, social cohesion, and more effective responses to community needs.

## 7. Conclusion

The Albania context distils into four insights for the ROOT WB project. Civic participation in Albania is driven by visible results rather than formal mechanisms — citizens mobilise around environmental campaigns, volunteer actions, and local advocacy when they can see tangible outcomes, meaning the project's participatory labs and citizen consultations will generate stronger engagement if explicitly designed to produce locally visible impact rather than formal institutional outputs. The youth dimension is simultaneously Albania's greatest civic asset and most critical structural vulnerability: internationally mobile young Albanians represent a skilled and values-driven cohort, but ongoing emigration continuously depletes this cohort from local communities, and the project must therefore invest not only in youth civic engagement but in making sustained local engagement attractive and impactful for those who return. The urban–rural divide is a civic legitimacy problem as much as a resource problem — a civil society structurally concentrated in Tirana cannot credibly claim to represent Albanian society, making deliberate geographic distribution of project activities a strategic necessity rather than an equity add-on. Finally, the EU accession window is time-sensitive: the strongest civil society empowerment effects occur during active negotiations when international conditionality gives CSOs genuine leverage, and the ROOT WB project is therefore well-timed to build credible CSO engagement in accession monitoring — an opportunity that will diminish as negotiations advance toward conclusion.

## COUNTRY CONTEXT: CROATIA

### 1. Main Political and Social Developments Affecting Civil Society and Civic Participation

In recent years, civil society in Croatia has operated in an increasingly polarised political and social environment. While the legal framework formally guarantees freedom of association, participation, and expression, civil society organisations (CSOs) increasingly report structural challenges affecting their sustainability, public legitimacy, and participation in decision-making processes. Recent rule of law and civic space reports point to increasing institutional closedness, shrinking space for meaningful participation, and growing pressure on independent civil society actors and watchdog organisations.<sup>196197</sup>

*“Croatia is rapidly becoming a textbook case of civil society shrinkage, with institutional, financial, and political conditions all moving in the same direction.”*

KII, Marko Kovačić, University of Rijeka (associate professor), 20 May 2026.

One of the main trends has been the growing **gap between formal mechanisms for civic participation and their actual influence** on public policies. Public consultations and advisory bodies formally exist, but participation is often perceived as procedural rather than meaningful, with limited impact on final decisions. Recent analyses highlight institutional closedness and weak inclusion of civil society actors in policymaking processes as one of the weakest dimensions of civic space in Croatia. A **critical structural gap** has emerged at the strategic level: Croatia currently lacks several key strategic documents relevant to the development of civil society and civic participation, including a new **National Strategy for the Development of Civil Society** (the previous one expired in 2016), a **National Programme for the Development of Volunteering**, and a **National Programme for Youth**. The absence of updated strategic frameworks further contributes to fragmented public policies and weak long-term support for civic participation and democratic engagement.<sup>198199</sup>

*“The absence of a National Strategy for Civil Society Development for almost a decade and the weakening of structured cooperation between public authorities and civil society further contribute to an environment where participation often exists in form rather than in substance.”*

KII, Lejla Šehić Relić, DKolektiv (executive director), 3 June 2026.

Political polarisation and hostile public narratives towards parts of civil society have intensified in recent years. Organisations working on human rights, democratic participation, gender equality, environmental issues, or anti-discrimination are increasingly exposed to **delegitimising rhetoric, accusations of political bias, and public attacks**, including references to “foreign-funded NGOs.” These dynamics contribute to declining public trust and discourage civic participation. In some cases, this pressure extends to SLAPP (Strategic Lawsuit Against Public Participation) lawsuits against civil society actors and journalists.<sup>200</sup>

<sup>196</sup> CIVICUS Monitor, Croatia country profile <https://monitor.civicus.org/country/croatia/>

<sup>197</sup> CroSol / V4 + report on the state of civil society [https://crosol.hr/wp-content/uploads/2026/05/Izvjestaj-o-stanju-civilnog-drustva\\_CZ\\_SK\\_SLO\\_HR.pdf](https://crosol.hr/wp-content/uploads/2026/05/Izvjestaj-o-stanju-civilnog-drustva_CZ_SK_SLO_HR.pdf)

<sup>198</sup> Government Office for Cooperation with NGOs – previous National Strategy for Civil Society Development 2012–2016 <https://udruga.gov.hr/istaknute-teme/nacionalni-plan-stvaranja-poticajnog-okruzenja-za-razvoj-civilnoga-drustva/nacionalna-strategija-stvaranja-poticajnog-okruzenja-za-razvoj-civilnoga-drustva-od-2012-do-2016-godine/280>

<sup>199</sup> Government Office for Cooperation with NGOs <https://udruga.gov.hr/>

<sup>200</sup> Liberties EU, civic space report on Croatia <https://www.liberties.eu/f/tf-r0m>

*“The most significant change has been the further shrinking of civic space, combined with growing political polarization, declining public trust and continuing shortage of quality and motivated staff and volunteers. Highly challenging political, institutional, socio-economic and organisational environment limits CSOs’ ability to pursue public policy advocacy, civic mobilisation and awareness-raising.”*

KII, Jelena-Gordana Zloić, Community Foundation Slagalica (director), 28 May 2026.

At the same time, civil society organisations continue to play an important role in service provision, community support, volunteering, youth participation, post-earthquake recovery, and social inclusion. However, many organisations report growing exhaustion caused by administrative pressures, unstable funding, staff burnout, and the constant need to adapt to changing institutional and political conditions. The overall trajectory is of a civic space that remains formally open but is increasingly fragile in practice.

## 2. Legal, Policy and Institutional Framework for CSOs

### Formal Framework

The legal framework for CSOs in Croatia is formally enabling. **The Act on Associations guarantees freedom of association**, and the procedure for establishing an association is relatively accessible. Croatia has a developed formal infrastructure for civil society, including the Government Office for Cooperation with NGOs, the Council for Civil Society Development, and the National Foundation for Civil Society Development.<sup>201202203</sup>

### Practice: Enabling or Restrictive?

In practice, the framework is inconsistently enabling and has significantly weakened in recent years. Croatia has not had an updated national strategic framework for civil society development since the previous National Strategy expired in 2016 — a gap of nearly a decade that has left the sector without coherent long-term policy direction.

*“One example of limited influence is the long-standing advocacy of civil society organisations for the adoption of a new National Strategy for Civil Society Development. Despite broad consensus within the sector regarding its necessity, Croatia has been without such a strategy for nearly a decade. This demonstrates both the persistence of civil society advocacy and the limited responsiveness of public authorities to strategic recommendations coming from the sector.”*

KII, Lejla Šehić Relić, DKolektiv, 3 June 2026.

Practical administrative and financial obligations can be demanding, especially for newly established and small grassroots associations that operate on a voluntary basis without professional staff or stable funding. A concrete example of disproportionate administrative burden is the accounting framework for non-profit organisations. Newly established associations are generally required to comply with more demanding accounting and reporting obligations before they can qualify for simplified bookkeeping. This creates a structural barrier for small local initiatives that wish to act at neighbourhood or community level but lack the resources for accounting, administration, or basic operating costs.<sup>204</sup> The National Foundation increasingly functions as an intermediary body for EU funding administration rather than as a strategic driver of civil society development. Broader strategic

<sup>201</sup> Act on Associations (Zakon o udruženjima) <https://www.zakon.hr/z/64/zakon-o-udrugama>

<sup>202</sup> Council for Civil Society Development <https://udruga.gov.hr/savjet-za-razvoj-civilnoga-drustva/120>

<sup>203</sup> National Foundation for Civil Society Development <https://zaklada.civilnodrustvo.hr/>

<sup>204</sup> Croatian Government – Accounting for associations (Racunovodstvo udruga) <https://gov.hr/hr/racunovodstvo-udruga/590>



support for civil society development, volunteering, and civic participation remains weak. The formal infrastructure exists but has lost much of its practical strength, with cooperation between CSOs and public institutions frequently dependent on political will, individual institutions, or local circumstances rather than stable systemic mechanisms.

### Cooperation Between CSOs and Public Institutions

Cooperation formally exists through public consultations, advisory bodies, and the Open Government Partnership process. However, in practice it is often weak, irregular, and dependent on political will and local circumstances.

*“In practice, the relationship is fragmented, uneven and highly dependent on political context, individual goodwill and the topic in question. CSOs were previously more often treated as partners during the pre-accession period, while they are now increasingly viewed with suspicion, distance or hostility, particularly when they work on human rights, anti-corruption, minority rights, gender equality, LGBTIQ+ rights or environmental protection. At local level, cooperation often depends on personal contacts rather than systematic mechanisms. CSOs may find themselves in a subordinate position, having to ask for access or cooperation rather than being recognised as equal partners.”*

KII, Jelena-Gordana Zloić, Slagalice, 28 May 2026.

Public consultations are frequently perceived as formal procedures rather than meaningful participation, with limited obligation to integrate CSO input into final decisions. Technical and administrative changes introduced in the e-Consultation system in 2024 additionally created new barriers for participation and contributed to a decline in public engagement.<sup>205206</sup>

*“Non-existent in any meaningful sense. The current government treats civil society largely as an adversary rather than a partner. The one exception is social service providers, who are tolerated, even relied upon, because the state has effectively outsourced welfare delivery to them. Advocacy-oriented and watchdog CSOs receive no such accommodation.”*

KII, Marko Kovačić, University of Rijeka, 20 May 2026.

The quality of cooperation varies significantly depending on local context, institutional culture, and individual decision-makers. Positive examples of long-term cooperation and participatory practices still exist, particularly at local level and within specific sectors, but they depend on individual actors rather than stable systemic mechanisms.

### Public Perception and Trust

Public perception of CSOs is mixed. Organisations providing visible social, humanitarian, or community services — particularly those working with children, older people, persons with disabilities, or vulnerable groups — often enjoy higher public legitimacy. In contrast, organisations involved in human rights, anti-discrimination, democracy, anti-corruption, gender equality, or watchdog activities are more exposed to political labelling, distrust, and hostile narratives. This bifurcation of public trust directly affects CSOs’ ability to mobilise citizens and claim political legitimacy for advocacy work.<sup>207</sup>

<sup>205</sup>GONG, Public debates in Croatia: who endures will participate (2024) <https://gong.hr/2024/09/17/javne-rasprave-u-hrvatskoj-ko-izdrzi-sudjelovat-ce/>

<sup>206</sup>Government Office for Cooperation with NGOs – Open Government Partnership <https://udruga.gov.hr/partnerstvo-za-otvorenu-vlast-271/271>

<sup>207</sup>CIVICUS Monitor, Croatia country profile <https://monitor.civicus.org/country/croatia/>

*“Only 5.6% of citizens are directly involved in civil society organisations, compared to an EU average of 11.4%. Volunteering is also below the European average. Those missing or underrepresented include citizens in rural and deprived areas, young people in formal participation structures, marginalised groups, and citizens who have withdrawn from public life due to distrust, fatigue or a belief that their voice has no influence.”*

KII, Jelena-Gordana Zloić, Slagalica, 28 May 2026.

### 3. Strengths and Capacity Gaps of CSOs

#### Key Strengths

- Strong adaptability and crisis response capacity: CSOs played an important role during the COVID-19 pandemic, post-earthquake recovery, humanitarian support, volunteering initiatives, and service provision for vulnerable groups, demonstrating the sector’s resilience and rapid response capability.
- Extensive project implementation experience and community-based work: many organisations, particularly at local level, maintain strong connections with their communities and rely on high levels of personal commitment, informal networks, and volunteer engagement.
- EEA and Norway Grants programmes have provided significant support for civil society development, advocacy work, democratic participation, human rights, and organisational strengthening — particularly important for organisations working in areas otherwise poorly covered by national and EU funding mechanisms.
- Local advocacy and cross-sector cooperation can still achieve concrete results: in 2025, the City of Sisak became the first city in Europe to officially proclaim Diversity Day, following an advocacy initiative led by LDA Sisak and local civil society organisations — demonstrating the potential of community-based advocacy to promote inclusion and democratic values.<sup>208</sup>

*“Honestly, the main differentiator is people. Strong CSOs survive on the enthusiasm, commitment, and professional quality of the individuals involved. Institutional resources, legal frameworks, and funding help, but where those are absent, human capital is what keeps organisations functional.”*

KII, Marko Kovačić, University of Rijeka, 20 May 2026.

#### Key Capacity Gaps

- Absence of stable and long-term funding mechanisms for community development, civic participation, youth work, advocacy, and democracy-related activities. Most organisations operate through short-term project funding with increasing competition for a decreasing number of available calls. The National Foundation’s institutional support grants reach only a limited number of organisations and cannot compensate for the broader lack of stable operational funding.
- Structural mismatch in EU funding allocation: a large share of available EU funds is increasingly focused on social services and welfare provision, while public institutions in the social care system are also eligible applicants. CSOs therefore compete directly with public institutions that have significantly greater administrative, financial, and human resource capacities. Funding opportunities for youth participation, democratisation, anti-corruption, civic participation, culture, and advocacy are limited, irregular, or entirely absent in some periods.
- “Projectisation” and survival mode: the strong dependence on short-term project funding limits space for long-term strategic development, experimentation, and social innovation.

<sup>208</sup>LDA Sisak – Sisak first in Europe to proclaim Diversity Day <https://lda-sisak.hr/sisak-prvi-u-europi-proglasio-dan-raznolikosti-na-nasu-inicijativu/>

Organisations are often focused primarily on maintaining basic operational continuity and adapting to available funding priorities rather than building sustained programmes around community needs. Both the Slagalica and DKolektiv interviewees document the sector's loss of strategic focus due to donor-driven work:

*"Many CSOs operate in 'survival mode', with short-term project-based funding, high volume of donor-driven projects, lack of clear focus and mission, limited staff, and declining opportunities to influence public policy. For advocacy and human rights organisations, the challenge is even greater because public funding is increasingly directed toward social services, while watchdog, advocacy and civic engagement work remains underfunded and politically sensitive."*

KII, Jelena-Gordana Zloić, Slagalica, 28 May 2026.

- Human resource crisis: significant salary increases in the Croatian public sector in recent years have made it increasingly difficult for CSOs to retain qualified staff or compete for professional expertise. Employment in the sector is characterised by short-term contracts, administrative overload, insecurity between projects, and high levels of burnout. Younger professionals increasingly seek more stable employment in the public or private sector, affecting organisational continuity and the sustainability of smaller local organisations.<sup>209210211</sup>
- Competitive rather than collaborative dynamics within the sector: project-based financing frequently places organisations in competitive rather than collaborative relationships, making advocacy, networking, and community work difficult to sustain unless directly funded through projects.

### Financial Sustainability

Financial sustainability remains one of the weakest aspects of the sector. Croatian civil society also operates in an environment where private philanthropy and individual donations remain relatively underdeveloped. Public support and donations are more visible in humanitarian campaigns and health-related causes, while organisations working on advocacy, democratic participation, human rights, culture, or public policy issues have far fewer opportunities to secure independent community-based funding. This creates a structural division between the "safe" service-oriented sector and the financially precarious advocacy-oriented sector, with different organisations facing qualitatively different sustainability challenges.

On what would happen if funding stopped tomorrow, interviewees give a narrow range of estimates that underscore the sector's structural fragility:

*"Very few. The sector as it currently exists is almost entirely funding-dependent, and for most organisations, even a short interruption in project income would be terminal."*

KII, Marko Kovačić, University of Rijeka, 20 May 2026.

*"Approximately 10%, mostly traditional organizations in smaller communities — grassroots organizations working on traditional culture, voluntary fire-brigades and similar. This type of organization already operates on a voluntary basis with minimal funding and is perceived as politically neutral and useful."*

KII, Jelena-Gordana Zloić, Slagalica, 28 May 2026.

<sup>209</sup>Croatian Government, public sector salary increases <https://vlada.gov.hr/news/salary-increases-expected-in-the-next-three-months/40859>

<sup>210</sup>Total Croatia News, Croatian public sector salary data <https://total-croatia-news.com/news/croatian-public-sector-4/>

<sup>211</sup>OECD Reviews of Labour Market and Social Policies: Croatia 2025 [https://www.oecd.org/en/publications/oecd-reviews-of-labour-market-and-social-policies-croatia-2025\\_90b78cc3-en/full-report/making-best-use-of-croatia-s-labour-force-potential\\_65e5096c.html](https://www.oecd.org/en/publications/oecd-reviews-of-labour-market-and-social-policies-croatia-2025_90b78cc3-en/full-report/making-best-use-of-croatia-s-labour-force-potential_65e5096c.html)

The CCI interviewee's answer is analytically important: it distinguishes between the large number of registered associations — most of which already operate without significant funding — and the professionalized advocacy and service-delivery organisations whose work most directly advances democratic governance. If funding stopped, the formally registered majority would survive, but the democratically active minority would not.

#### 4. Citizen Participation in Public Life and Decision-Making

Citizen participation in public life in Croatia remains relatively limited and uneven, particularly regarding formal decision-making processes. Although institutional mechanisms for participation formally exist — including public consultations, advisory bodies, and local participatory processes — citizen engagement is generally low and often perceived as having limited influence on actual political decisions. Recent analyses and civil society reports indicate declining participation in public consultations and growing frustration with the formal consultation system.<sup>212</sup>

*“Citizen engagement is low and declining. Only 5.6% of citizens are directly involved in civil society organisations, compared to an EU average of 11.4%. Engagement is mostly short-term and project-driven.”*

KII, Jelena-Gordana Zloić, Slagalica, 28 May 2026.

Citizens continue to mobilise around concrete local and community issues, particularly environmental protection, urban development, public space, waste management, and quality-of-life concerns. Civic initiatives and local protests related to environmental issues and public infrastructure have become one of the more visible forms of civic participation in recent years. However, this participation is often reactive, issue-based, and short-term rather than connected to sustained engagement in public policy processes or formal civic structures. Volunteering and humanitarian engagement remain socially more accepted and publicly visible forms of participation than advocacy or political engagement. Citizens are generally more likely to support activities related to humanitarian aid, health, children, older people, disaster response, or community solidarity than initiatives focused on governance, democratic participation, human rights, or anti-corruption issues. Public trust in political institutions remains relatively low, contributing to political apathy and distrust regarding the possibility of meaningful change through participation. The Slagalica interviewee introduces **the concept of “internal exit”** — a term that captures a qualitatively different dynamic from simple non-participation:

*“Low trust in institutions, low belief that citizens can influence politics, civic fatigue, disillusionment and weak civic education lead to a form of ‘internal exit’, where citizens mentally withdraw from the public sphere because they feel powerless. In addition, CSOs rarely, if at all, work on community organising.”*

KII, Jelena-Gordana Zloić, Slagalica, 28 May 2026.

There are positive examples of participatory and deliberative practices at local level. Some Croatian cities have experimented with participatory budgeting processes, while Rijeka implemented one of the first citizens' assemblies in Croatia.

*“I would place the emphasis on small neighbourhoods and local communities, focusing on civic activism in the fields of politics, culture and the arts, environmental protection, and care for vulnerable groups.”*

KII, Mirela Despotović, Center for Civil Initiatives, 24 May 2026.

Although such initiatives remain limited and often dependent on local political leadership and project-based support, they demonstrate growing interest in more participatory approaches to local

<sup>212</sup>GONG, Public debates in Croatia: who endures will participate (2024) <https://gong.hr/2024/09/17/javne-rasprave-u-hrvatskoj-ko-izdrzi-sudjelovat-ce/>

governance and citizen engagement. These examples are directly relevant for the ROOT WB project's focus on deliberative and participatory democracy models.

## 5. Main Barriers to Civic Participation

### Institutional Barriers

- Weak actual influence of citizens and CSOs on decision-making processes, despite formally existing mechanisms. Participation is often perceived as symbolic rather than meaningful, with cooperation frequently dependent on political will, individual decision-makers, and local circumstances rather than stable participatory mechanisms.
- Absence of updated national strategic frameworks for civil society development, volunteering, and youth participation, contributing to fragmented and inconsistent public policies. The strategy gap since 2016 has left the sector without long-term institutional direction.
- Technical and administrative changes in the e-Consultation system introduced in 2024 created additional barriers for participation, contributing to a documented decline in public engagement with formal consultation processes.<sup>213</sup>

*“Majority of CSOs in Croatia no longer have ambition or aspiration to influence and/or participate in decision-making. A few remaining advocacy and watchdog CSOs, mostly concentrated in Zagreb, engage in formal participation through online consultative processes. It is worth mentioning that public consultations exist, but are frequently described by CSOs as superficial, with limited impact on final decisions. Watchdog organisations are often excluded from policy-making.”*

KII, Jelena-Gordana Zloić, Slagalica, 28 May 2026.

### Financial and Administrative Barriers

- Most CSOs depend on short-term project funding, while stable operational support for advocacy, civic participation, youth work, and community development remains limited. Organisations often lack the time and resources necessary for long-term advocacy, networking, or citizen engagement activities unless these are directly funded through projects.
- Complex funding procedures, demanding reporting obligations, and administrative requirements consume significant organisational capacities and discourage participation by smaller organisations with limited staff and resources.
- Disproportionate accounting and administrative obligations for newly established small associations create a structural barrier for grassroots initiatives at neighbourhood or community level.<sup>214</sup>

### Political and Legal Barriers

- Organisations working on human rights, anti-corruption, environmental protection, public accountability, or minority rights are exposed to political pressure, hostile public narratives, and in some cases SLAPP lawsuits, which further discourages advocacy work and public participation.<sup>215</sup><sup>216</sup>
- Delegitimising rhetoric targeting “foreign-funded NGOs” and organisations perceived as politically critical intensifies the chilling effect on advocacy work and narrows the space for independent civil society engagement in policy processes.

<sup>213</sup>GONG, Public debates in Croatia (2024) <https://gong.hr/2024/09/17/javne-rasprave-u-hrvatskoj-tko-izdrzi-sudjelovat-ce/>

<sup>214</sup>Croatian Government – Accounting for associations <https://gov.hr/hr/racunovodstvo-udruga/590>

<sup>215</sup>Liberties EU, civic space report on Croatia <https://www.liberties.eu/f/tf-r0m>

<sup>216</sup>CIVICUS Monitor, Croatia country profile <https://monitor.civicus.org/country/croatia/>

## Societal Barriers

- Low public trust in political institutions and widespread perceptions that citizen participation has limited impact contribute to political apathy and weak civic engagement. Civic participation is often reactive and focused on concrete local problems rather than sustained engagement in public life.
- Inconsistent implementation of civic education: civic education in Croatia is not systematically implemented as a mandatory subject across all schools, and is often delivered through cross-curricular approaches with uneven quality and reach. As a result, many young people leave the education system without sufficient civic literacy, knowledge of democratic processes, or experience with participation and community engagement.<sup>217</sup>
- Demographic trends further affect participation, particularly in smaller communities and rural areas affected by emigration, ageing populations, and the loss of active citizens and community leaders.

*“First, civic ignorance: a genuine lack of knowledge about what civil society is, what it does, and why it matters. Second, information overload: in an environment saturated with stimuli and bad news, civic engagement struggles to compete for attention and emotional bandwidth.”*

KII, Marko Kovačić, University of Rijeka, 20 May 2026.

## 6. Priority Actions to Strengthen CSOs and Improve Civic Participation

### Adopt Updated National Strategic Frameworks

- The adoption of updated national strategic frameworks related to civil society development, volunteering, and youth participation must be treated as the most urgent institutional priority. Nearly a decade without a national civil society strategy has left the sector without coherent long-term policy direction and has progressively weakened institutional support mechanisms. The new strategy should include clear implementation mechanisms, dedicated stable funding, and accountability structures.<sup>218</sup>

### Improve Financial Sustainability and Funding Mechanisms

- Increase the availability of long-term operational funding, particularly for organisations working in civic participation, youth work, advocacy, democratisation, culture, human rights, and community development. Funding mechanisms should support long-term organisational development and social innovation rather than only short-term project implementation.
- Reform EU funding allocation to better balance support between social service providers and organisations working on democratic participation, advocacy, and civic engagement. Public institutions should not compete with CSOs on equal terms for funds specifically designed for civil society.
- Reduce administrative and accounting obligations for newly established and small grassroots associations to remove structural barriers for community-level initiatives.<sup>219</sup>

### Reform Public Consultation into a Genuine Accountability Mechanism

All four interviewees identify the same systemic change as most important: making participation produce visible, traceable outcomes:

<sup>217</sup>GONG, Analysis of the Possibilities for Non-Formal Civic Education (2024) <https://gong.hr/wp-content/uploads/2024/04/Analysis-of-the-Possibilities-for-Non-Formal-Civic-Education.pdf>

<sup>218</sup>Government Office for Cooperation with NGOs – National Strategy for Civil Society Development 2012–2016 <https://udruga.gov.hr/istaknute-teme/nacionalni-plan-stvaranja-poticajnog-okruzenja-za-razvoj-civilnoga-drustva/nacionalna-strategija-stvaranja-poticajnog-okruzenja-za-razvoj-civilnoga-drustva-od-2012-do-2016-godine/280>

<sup>219</sup>Croatian Government – Accounting for associations <https://gov.hr/hr/racunovodstvo-udruga/590>



*“A real shift would require rebuilding trust through participation models where citizens and CSOs can clearly see that their input affects policies, budgets and local decisions. This also means strengthening civic education, supporting grassroots initiatives and ensuring that institutions treat civil society as a legitimate democratic partner rather than a formal stakeholder to be consulted symbolically.”*

KII, Jelena-Gordana Zloić, Slagalica, 28 May 2026.

*“Sustained civic education, starting early and continuing through adulthood, that makes the value and function of civil society legible to ordinary citizens. People do not participate in what they do not understand or trust, and right now the system does very little to build either.”*

### Strengthen Civic Participation Mechanisms

- Public consultations should allow sufficient time for participation, include clear feedback mechanisms, and ensure that citizen and CSO contributions are genuinely considered in decision-making processes. The 2024 changes to the e-Consultation system should be reviewed and reversed where they have demonstrably reduced participation.<sup>220</sup>
- Local participatory and deliberative practices — including citizens’ assemblies and participatory budgeting — should be further encouraged, institutionally recognised, and supported beyond individual projects or political cycles. The experience in Rijeka and other municipalities with deliberative approaches offers a concrete model for scaling.
- Develop community and socio-cultural centres as open public spaces where citizens can meet, cooperate, exchange knowledge, and participate in community life over the long-term. Such spaces play an important role in strengthening social trust, democratic culture, and active citizenship, while creating conditions for social innovation and new forms of participation.

### Strengthen Civic Education and Protect Civic Space

- Civic education should be systematically implemented across the education system as a mandatory subject, developing democratic competencies, critical thinking, participation skills, and community engagement among young people rather than being delivered through fragmented cross-curricular approaches.<sup>221</sup>
- Adopt effective legal protection against SLAPP lawsuits and publicly counter hostile narratives targeting civil society organisations, journalists, and human rights defenders. Reducing political pressure and delegitimising rhetoric is essential for sustaining an independent and effective civil society sector.<sup>222</sup>

### Build Collective Civic Infrastructure

Two interviewees independently identify sector fragmentation as the most urgent internal problem to address, and propose the same solution — a stronger collective platform:

*“CSOs need to move beyond project-based cooperation and invest more in building a shared civic agenda. Stronger collaboration, joint advocacy, and collective leadership are essential if civil society is to respond effectively to growing social challenges and defend civic space. A more united sector would be better positioned to influence public policies, mobilise citizens, and strengthen democratic resilience.”*

<sup>220</sup>GONG – Public debates in Croatia (2024) <https://gong.hr/2024/09/17/javne-rasprave-u-hrvatskoj-ko-izdrzi-sudjelovat-ce/>

<sup>221</sup>GONG – Analysis of the Possibilities for Non-Formal Civic Education (2024) <https://gong.hr/wp-content/uploads/2024/04/Analysis-of-the-Possibilities-for-Non-Formal-Civic-Education.pdf>

<sup>222</sup>Liberties EU – Civic space report on Croatia <https://www.liberties.eu/f/tf-r0m>

KII, Lejla Šehić Relić, DKolektiv, 3 June 2026.

*“If I could change one thing, it would be to strengthen the collective voice of civil society through a new national platform of CSOs capable of mobilising organisations across sectors and regions around common priorities. Croatia has many strong organisations, but their influence is often diluted by fragmentation and project-driven work.”*

KII, Lejla Šehić Relić, DKolektiv, 3 June 2026.

### Address Geographic Inequalities and Demographic Pressures

- Strengthen smaller local organisations and grassroots initiatives, particularly in smaller communities and rural areas affected by depopulation and limited resources. This includes improving access to public infrastructure, community spaces, capacity-building programmes, and administrative support.
- Invest in community-based cooperation, trust-building, and local civic infrastructure. Stronger networking between CSOs, informal initiatives, educational institutions, cultural actors, researchers, and local communities could create more resilient and sustainable forms of civic engagement in contexts where institutional support remains weak or inconsistent.

## 7. Conclusion

The Croatia context distils into four insights for the ROOT WB project. The civic space challenge is structural rather than legal — a decade without a national civil society strategy has allowed the institutional infrastructure to drift away from its civil society development mandate toward EU funding administration, meaning capacity-building interventions will have limited systemic impact unless paired with advocacy for a new strategy and reformed public funding mechanisms. The public sector salary increase dynamic is a structurally underanalysed but acute problem: CSOs whose pay scales are anchored to project budgets that do not adjust in real time face a widening labour market competitiveness gap that will continue to erode the sector's human capital unless addressed through dedicated salary support mechanisms and multi-year institutional grants. The Sisak Diversity Day example demonstrates that locally rooted organisations outside major urban centres can achieve concrete democratic outcomes through sustained advocacy and relationship-building with local authorities around shared interests — a replicable model directly relevant to the ROOT WB project's activities across partner countries. Finally, Croatia's position as the only EU member state in the partnership gives it a distinctive regional learning role: its experience of post-accession civic space deterioration — where EU membership did not automatically strengthen civil society — is a necessary corrective for Western Balkans partners who may assume that accession resolves the structural problems identified in their own country analyses.

## COUNTRY CONTEXT: FRANCE

*Note: France is the ROOT WB partner country that is a long-standing EU member state rather than a Western Balkans accession country. This template therefore reflects a qualitatively different civic space context — one shaped not by EU accession dynamics but by the internal democratic challenges of an established liberal democracy. Its inclusion in the ASSESSMENT REPORTS ON CIVIC PARTICIPATION TRENDS AND BARRIERS provides the project with a comparative EU reference point and reflects ALDA's specific role as a transnational partner linking EU and Western Balkans civil society.*

### 1. Main Political and Social Developments Affecting Civil Society and Civic Participation

France's civil society operated in a particularly turbulent environment between 2021 and 2026, shaped by political polarisation, social protest, legislative restrictions on civil society, and declining public trust in democratic institutions. Unlike the Western Balkans partner countries in the ROOT WB project, where civic space challenges are primarily driven by authoritarian tendencies and weak institutional frameworks, France's challenges emerge from within a mature democracy — making them structurally distinct but in some respects equally consequential for civil society sustainability and meaningful civic participation.<sup>223</sup> The most significant political development was the deepening of electoral and parliamentary fragmentation. After the 2022 presidential election, President Macron was re-elected but lost the parliamentary majority, making political cooperation increasingly difficult. The snap parliamentary elections of 2024 intensified divisions further: although the far-right Rassemblement National (RN) won the first round, a broad coalition of parties coordinated to prevent it from forming a government. Voter turnout in the second round reached almost 67% — a figure that reflected reactive civic mobilisation rather than sustained democratic engagement, and one of the defining patterns of French civic participation in this period.<sup>224</sup>

**Social protest** became the dominant form of mass civic participation. The 2023 pension reform protests — triggered by the government's use of Article 49.3 to raise the retirement age from 62 to 64 without a parliamentary vote — brought more than one million people into the streets and were coordinated by trade unions and civil society groups. The 2023 riots following the police killing of Nahel Merzouk, and the sustained climate activism of organisations such as Greenpeace France and Notre Affaire à Tous, further demonstrated the vitality of issue-based civic mobilisation. However, as multiple KII respondents observed, this protest energy does not reliably translate into structured, long-term civic engagement within organisations.

The most structurally consequential development for civil society was the adoption of the **“Loi Séparatisme” (Law on Republican Principles)** in August 2021. This legislation introduced the **Contrat d'Engagement Républicain (CER) — a Republican Commitment Contract** that all associations seeking public funding or official recognition must sign. The law also expanded government powers to dissolve associations without a court decision. While formally justified as a counter-extremism measure, the law has generated widespread concern among civil society actors about its chilling effects on advocacy organisations, minority communities, and groups working on sensitive political topics. As one KII

<sup>223</sup>CEVIPOF (Sciences Po), Baromètre de la Confiance Politique (annual 2022–2024)

<https://www.sciencespo.fr/cevipof/fr/content/le-barometre-de-la-confiance-politique.html>

<sup>224</sup>Fondapol, Political shifts and government majority in right-leaning France

<https://www.fondapol.org/en/study/political-shifts-and-government-majority-in-right-leaning-france/>

respondent noted, “Donor-driven regulations can lead to self-censorship, while advocacy-oriented CSOs face greater political and reputational pressure.”<sup>225</sup>

*“The environment for CSOs is increasingly complex, marked by national budget cuts and a political climate that is currently not very supportive of civil society.”*

KII, Project Manager, intergovernmental organisation supporting civil society (anonymous), 22 May 2026.

Trust in political institutions continued to decline across this period, as documented annually by the **CEVIPOF Baromètre de la Confiance Politique**. More than half of voters abstained in the first round of the 2022 legislative elections, reflecting a deepening disengagement from traditional political structures. Trust in civil society organisations remained comparatively higher, but also decreased following the COVID-19 pandemic — particularly for large national organisations perceived as disconnected from local realities.<sup>227</sup>

## 2. Legal, Policy and Institutional Framework for CSOs

### Formal Framework

France has one of Europe’s most historically open legal frameworks for civil society, anchored in **the Law of 1 July 1901 on Associations** — a foundational text that remains the basis for the registration and operation of more than 1.3 million active associations. Creating an association requires no prior state authorisation, and the sector spans sports, culture, education, social services, and advocacy. The institutional architecture includes the **High Council for Associative Life (HCVA)** and the **Economic, Social and Environmental Council (CESE)** as consultative bodies, and France participates in the Open Government Partnership, adopting a national action plan in 2023 focused on citizen participation, transparency, and open government.<sup>228</sup>

### The Loi Séparatisme and the CER: A Structural Shift

The 2021 “Loi Séparatisme” represents the most significant **legal shift affecting civil society in France in recent decades**. The Contrat d’Engagement Républicain (CER) requires associations receiving public funding or official accreditation to formally commit to respecting republican values, secularism, human dignity, and public order. The law also broadened government powers to dissolve associations without a court decision, weakening protections traditionally guaranteed by the 1901 Law. The Council of State confirmed the legality of the new framework in 2023, but a coalition of 25 civil society organisations — including Sherpa and environmental and anti-corruption groups — took legal action against the implementing decree.<sup>230</sup> The CER’s practical impact has been significant and uneven. Documented cases show that associations working on women’s rights, anti-discrimination, and civic

<sup>225</sup>Civic Space Watch / European Civic Forum, France: Implementation of ‘Separatism Law’ Raises Concerns of CSOs <https://civicspacewatch.eu/france-implementation-of-separatism-law-raises-concerns-of-csos/>

<sup>226</sup>Barbé, V., The Republican Commitment Contract for Associations in France: Further Restrictions on Freedom of Association (IACL-IADC Blog, 2024) <https://blog-iacl-aidc.org/2024-posts/2024/9/26/the-republican-commitment-contract-for-associations-in-france-further-restrictions-on-freedom-of-association>

<sup>227</sup>CEVIPOF (Sciences Po), Baromètre de la Confiance Politique (annual 2022–2024) <https://www.sciencespo.fr/cevipof/fr/content/le-barometre-de-la-confiance-politique.html>

<sup>228</sup>INSEE, 1.3 Million Associations (INSEE Première No. 1857, 2022) <https://www.insee.fr/en/statistiques/5433847>

<sup>229</sup>Open Government Partnership, France Action Plan Review 2023–2025 <https://www.opengovpartnership.org/documents/france-action-plan-review-2023-2025/>

<sup>230</sup>Sherpa et al. (25 associations), Law on Separatism: Environmental and Anti-Corruption Groups Take Legal Action Against the CER Decree <https://www.asso-sherpa.org/law-separatism-environmental-and-anti-corruption-groups-take-legal-action-against-the-decree-enacting-the-contract-of-republican-commitment>

<sup>231</sup>Sénat de France, Loi du 24 août 2021 confortant le respect des principes de la République: tout reste à faire (Senate Report No. 383, 2023) <https://www.senat.fr/rap/r23-383/r23-3838.html>

education have faced funding cuts or administrative pressure based on accusations linked to religious expression or alleged “ethnocentrism” — in cases where no formal violation of republican principles was confirmed by courts. Civil society monitoring organisations describe this as a “chilling effect” particularly pronounced for advocacy organisations working with minority communities. KII respondents confirmed this pattern, with one noting that “self-censorship can result from donor-driven regulations,” particularly for organisations with more visible or outspoken identities.

### Cooperation Between CSOs and Public Institutions

Consultative bodies such as the HCVA and CESE formally exist but their **recommendations are not binding and are rarely fully implemented**. The 2023 OGP National Action Plan was criticised by civil society for omitting key issues including lobbying transparency and political financing reform. France has experimented with new participatory mechanisms — most notably the Citizens’ Conventions on climate, biodiversity, and end-of-life issues — which were internationally praised as democratic innovations. However, participants and NGOs subsequently expressed disappointment as recommendations were **only partially reflected in government policy**, generating frustration and eroding trust in the processes themselves.<sup>232233</sup> In practice, the relationship between CSOs and public institutions is **highly context-dependent**.

The Mouvement Européen Vaucluse president offers the most concrete illustration of what happens when formal participation mechanisms do not translate into policy change:

*“A clear example of limited impact is the Yellow Vests crisis, during which participatory debates and grievance reports were organised nationwide. Although thousands of citizen contributions were collected and sent to national authorities, they were never properly analysed or used, and the underlying issues remained unresolved.”*

KII, Jean Marie Biliato, Mouvement Européen Vaucluse, 27 May 2026.

At **local level**, cooperation tends to be more fluid and trust-based, particularly where organisations are historically embedded in local solidarity systems. However, municipal-level funding has deteriorated significantly since 2022, weakening one of the main channels through which local CSOs previously accessed stable operational support.

*“In practice, the relationship is highly formal and administrative, often lacking a human approach, although when informal channels exist and the right contact person is involved, cooperation can be effective.”*

KII, Project Manager, intergovernmental organisation supporting civil society, 22 May 2026.

### Public Perception and Trust

Public trust in associations remains higher than trust in political institutions, but has declined since the COVID-19 pandemic. The sector’s dual reputation — as both an essential service provider trusted at local level and a large institutionalised actor perceived as disconnected at national level — reflects a structural fragmentation between well-established national organisations and smaller community-rooted associations. For organisations working on politically sensitive topics, public perception is increasingly shaped by political polarisation rather than objective assessment of their work.

## 3. Strengths and Capacity Gaps of CSOs

<sup>232</sup>CIVICUS Monitor, Associations push back as Separatism Law comes into effect

<https://monitor.civicus.org/explore/associations-push-back-separatism-law-comes-effect-cso-tackling-islamophobia-dissolved-ib6p/>

<sup>233</sup>Open Government Partnership, France Action Plan Review 2023–2025

<https://www.opengovpartnership.org/documents/france-action-plan-review-2023-2025/>

## Key Strengths

France has one of the largest and most developed civil society sectors in Europe. Around 1.3 million associations are active, approximately 170,000 employ paid staff, and the sector provides around 2.2 million jobs. Some 21 million volunteer roles are distributed across different organisations. The intergovernmental organisation interviewee identifies inter-CSO solidarity as a strength that has grown precisely because of adversity:

*“Solidarity among CSOs has strengthened and organizations have developed more creative ways of communicating.”*

KII, Project Manager, intergovernmental organisation supporting civil society, 22 May 2026.

The associative sector is particularly important within the Social and Solidarity Economy, representing more than 10% of total employment in France. Key strengths include:

- Scale, diversity, and deep local embeddedness: associations are active across virtually every sector of French society and are often the primary providers of social services, cultural life, and community solidarity at local level, particularly in rural areas and underserved urban peripheries.<sup>234</sup>
- Strong legal and historical foundation: the 1901 Law on Associations remains one of the most accessible legal frameworks for civic organisation in Europe, and France has a long tradition of volunteering and associative life that provides significant social capital.
- Strategic litigation capacity: the “Affaire du Siècle” climate case, in which Greenpeace France, Oxfam France, and Notre Affaire à Tous successfully brought the French state to court for insufficient climate action — with the decision confirmed on appeal in 2023 — demonstrates a growing capacity for high-impact public interest litigation that has influenced climate governance.
- Innovation in participatory democracy: France’s Citizens’ Conventions, though imperfect in implementation, represent internationally recognised experiments in deliberative democracy that have generated significant learning and transferable methodology for other countries, including the Western Balkans partners in this project.
- Stronger inter-CSO solidarity since 2022: as one KII respondent noted, “solidarity among CSOs has strengthened and organisations have developed more creative ways of communicating” in response to a more difficult environment, representing an adaptive capacity that is itself a civic asset.

## Key Capacity Gaps

- Financial fragility: since 2022, budget pressures at local and national level have reduced available funding, with municipal-level subsidies — historically a crucial pillar for smaller associations — among the hardest hit. As one KII respondent put it: “If funding stopped, most CSOs would close. Only a small number would continue at minimal level through voluntary work.” Most organisations depend on short-term project grants with limited access to multi-year operational funding.
- Limited advocacy capacity: except for large national organisations and major umbrella networks, most associations lack staff and resources for sustained policy advocacy, communication, or public campaigns. The sector is highly fragmented, making it difficult for civil society to speak with a coherent common voice on policy issues.<sup>235</sup>
- Human resource imbalance: leadership positions in associations remain predominantly held by older men, while women and younger people are underrepresented in governance roles.

<sup>234</sup>OECD, France Country Fact Sheet – Social and Solidarity Economy (2023)  
<https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/social-economy-and-social-innovation/country-fact-sheets/country-fact-sheet-france.pdf>

<sup>235</sup>TSI Project, National Report No. 4: Challenges for the Third Sector in France  
<https://thirdsectorimpact.eu/documentation/tsi-national-report-on-challenges-for-the-third-sector-in-france/>



Recruiting and retaining younger, more diverse volunteers is a growing challenge. As the sector professionalises in social services delivery, its volunteer-based and community-oriented identity is under strain.

- Uneven digital transition: digital tools became essential during the COVID-19 pandemic, but many smaller associations — particularly those working in rural areas or with elderly populations — still lack the tools and skills to fully adapt, creating a growing competitiveness gap with larger, digitally proficient organisations.
- CER compliance burden: the administrative requirements of the Republican Commitment Contract add disproportionate pressure on small and medium-sized organisations, particularly those working with religious or minority communities, and limit their access to public funding and legal standing.
- Sector fragmentation: organisations working on the same themes in the same territory compete rather than cooperate. The Association Leader France interviewee identifies merging as an urgent structural priority:

*“CSOs need to improve coordination and cooperation, including merging organisations working on the same themes within the same territory, in order to pool resources, increase expertise, and strengthen their impact.”*

KII, Elyse Lebreuilly, Association Leader France, 1 June 2026.

### Financial Sustainability

Financial sustainability is the central challenge for French civil society in the current period. Unlike in Western Balkans countries where donor dependency reflects underdeveloped domestic funding, France’s financial fragility reflects a political choice: declining public investment in civil society at a time of budget consolidation, combined with an underdeveloped private philanthropy culture compared to countries such as the UK or the United States.

Interviewees give consistent assessments of what would happen if funding stopped:

*“Smaller, volunteer-based CSOs might continue operating at a minimal level, while organizations with salaried staff would most likely be forced to close.”*

KII, Project Manager, intergovernmental organisation supporting civil society, 22 May 2026.

The Association Leader France interviewee adds the geographic dimension of financial vulnerability:

*“Most CSOs, especially small and rural ones, have low financial sustainability. They are vulnerable due to declining national funds, highly competitive European programmes, and difficulties in generating income through membership fees.”*

KII, Elyse Lebreuilly, Association Leader France, 1 June 2026.

## 4. Citizen Participation in Public Life and Decision-Making

France shows a paradoxical civic participation profile: one of Europe’s highest levels of protest participation coexists with growing abstentionism in elections and deepening scepticism toward formal democratic processes. The 2023 pension reform protests, bringing over one million people onto the streets, and the mobilisation against far-right government formation in 2024, demonstrate that French citizens retain significant collective civic energy. But as the Mouvement Européen Vaucluse president observes, this energy does not reliably translate into sustained organisational commitment:

*“The biggest challenge for CSOs today is mobilising and retaining active members. Many people are willing to attend events or benefit from activities, but very few are prepared to take on responsibilities or engage continuously.”*

KII, Jean Marie Biliato, Mouvement Européen Vaucluse, 27 May 2026.

On who participates and who is absent, interviewees are consistent across all three organisations:

*“Engagement mainly comes from people already connected to the sector, such as family members, friends, academics, and political or civic leaders, while underprivileged groups are often missing due to lack of information and limited perceived benefits.”*

KII, Project Manager, intergovernmental organisation supporting civil society, 22 May 2026.

France has introduced **innovative deliberative democracy mechanisms** — most notably the Citizens’ Convention for the Climate (150 randomly selected citizens), and subsequent Conventions on biodiversity and end-of-life issues. These were internationally recognised as significant democratic experiments, but without actual effect. This “consultation-legitimation gap” is one of the most analytically significant features of French civic participation for the ROOT WB project. **Electoral abstention** has become a structural feature of French democracy. Over half of voters abstained in the first round of the 2022 legislative elections. Young people remain active in civic life through volunteering, social movements, online campaigns, petitions, and direct action on climate and social justice, but are largely absent from traditional political structures: parties, trade unions, and association governance roles.<sup>236</sup> Civic participation is marked by **sharp social inequalities**. As documented across multiple KII interviews, participation is concentrated among people already connected to the sector — teachers, retired professionals, academics, and those with family or personal links to civil society. Underprivileged groups, people in disadvantaged suburbs (

## 5. Main Barriers to Civic Participation

### Legal and Institutional Barriers

- The Contrat d’Engagement Républicain (CER) creates a chilling effect on civil society, particularly for advocacy organisations and those working with religious or minority communities. Its vague criteria allow different interpretations by public authorities, and associations have reportedly lost funding in cases where no formal violation of republican values was confirmed by courts. The expanded power to dissolve associations without judicial oversight weakens the structural protections traditionally guaranteed by the 1901 Law.<sup>237,238</sup>
- Civil society organisations also face structural disadvantages in policymaking processes, where lobbying transparency remains weak and corporate actors enjoy significantly greater access to and recognition in formal policy channels than civil society does.
- The “consultation-legitimation gap”: participatory mechanisms such as Citizens’ Conventions formally exist but systematically fail to translate citizen input into binding policy outcomes. As one KII respondent summarised, “Participatory mechanisms are sometimes used more to legitimise decisions than to genuinely share power with citizens.” This institutionalised disappointment actively discourages future participation.

<sup>236</sup> INJEP / DJEPVA, Baromètre DJEPVA sur la jeunesse (2022) <https://national-policies.eacea.ec.europa.eu/youthwiki/chapters/france/24-youth-volunteering-at-national-level>

<sup>237</sup> Civic Space Watch / European Civic Forum, France: Implementation of ‘Separatism Law’ Raises Concerns of CSOs <https://civicspacewatch.eu/france-implementation-of-separatism-law-raises-concerns-of-csos/>

<sup>238</sup> Barbé, V., The Republican Commitment Contract (IACL-IADC Blog, 2024) <https://blog-iacl-aidc.org/2024-posts/2024/9/26/the-republican-commitment-contract-for-associations-in-france-further-restrictions-on-freedom-of-association>

## Financial Barriers

- Since 2022, significant cuts to public funding at both national and municipal levels have destabilised a large number of small and medium-sized associations that depended on operational subsidies for basic continuity. Multi-year funding agreements exist but access is uneven, and most organisations remain dependent on short-term project grants.<sup>239</sup>
- Private philanthropy in France remains underdeveloped relative to peer European countries, meaning that the decline in public funding cannot be offset by increased individual or corporate donations. Small and local organisations have limited access to European funding due to administrative complexity and language barriers, as confirmed by multiple KII respondents.

## Societal Barriers

- Rising individualism: both KII respondents and multiple survey sources identify increasing individualism as a primary barrier.

*“The main barriers are the rise of individualism and the lack of financial and structural capacity within CSOs to properly engage and retain participants.”*

KII, Elyse Lebreuilly, Association Leader France, 1 June 2026.

- The fear of long-term commitment is a consistent theme across interviews.

*“The two main barriers are lack of knowledge and trust in participatory processes, and the perception that people do not have enough time to engage.”*

KII, Project Manager, intergovernmental organisation supporting civil society, 22 May 2026.

- Political polarisation increasingly affects how associations are perceived, particularly those working on migration, religion, gender identity, or climate activism, which are viewed through a partisan lens that makes coalition-building harder and exposes organisations to reputational and political pressure.<sup>240</sup>
- Structural participation inequalities: people with higher education and stronger economic situations are significantly more likely to volunteer or engage in associations. Young people not in education or employment, low-income communities, and residents of disadvantaged suburbs or rural areas participate substantially less in formal civic structures.

## 6. Priority Actions to Strengthen CSOs and Improve Civic Participation

### Reform the Republican Commitment Contract (CER)

- The CER must be reformed to establish clearer and more legally precise criteria, stronger judicial oversight of funding decisions, and effective appeal mechanisms for organisations that lose public support. The current vagueness of the framework enables arbitrary application and disproportionately targets advocacy organisations and minority communities. Particular care must be taken to ensure that religious or cultural expression that does not constitute a violation of republican values does not trigger adverse consequences.<sup>241,242</sup>

### Restore and Restructure Public Funding for Civil Society

<sup>239</sup>TSI Project, National Report No. 4: Challenges for the Third Sector in France

<https://thirdsectorimpact.eu/documentation/tsi-national-report-on-challenges-for-the-third-sector-in-france/>

<sup>240</sup>CEVIPOF (Sciences Po), Baromètre de la Confiance Politique (2022–2024)

<https://www.sciencespo.fr/cevipof/fr/content/le-barometre-de-la-confiance-politique.html>

<sup>241</sup>Barbé, V., The Republican Commitment Contract (IACL-IADC Blog, 2024) <https://blog-iacl-aidc.org/2024-posts/2024/9/26/the-republican-commitment-contract-for-associations-in-france-further-restrictions-on-freedom-of-association>

<sup>242</sup>Sénat de France, Report No. 383 (2023) <https://www.senat.fr/rap/r23-383/r23-3838.html>

- Public authorities should reverse budget cuts to associative sector funding and significantly increase the availability of multi-year, operational funding agreements. Funding mechanisms must better support long-term organisational development, advocacy, civic education, and community work rather than exclusively short-term project delivery. Transparent and accessible criteria are essential, with particular attention to smaller associations in rural areas and disadvantaged communities that currently have the least access to EU and competitive funding programmes.

### Make Participatory Democracy Mechanisms Genuinely Binding

- Citizens' Conventions and public consultation processes must be redesigned to close the gap between citizen input and policy outcomes.
- Introduce locally implemented participatory democracy approaches — as recommended by multiple KII respondents — creating inclusive spaces where citizens can connect with institutions and feel that engagement leads to tangible results in their communities.

*“I would introduce participatory democracy approaches that are actively implemented at the local level, creating inclusive spaces where citizens can connect with institutions and feel encouraged to engage.”*

KII, Project Manager, intergovernmental organisation supporting civil society, 22 May 2026.

### Reduce Civic Participation Inequalities

- More structured support is needed for young people, low-income communities, residents of disadvantaged suburbs, rural populations, and migrant communities to engage in civic life. This includes easier access to funding for grassroots associations, stronger civic education in schools and non-formal settings, and outreach strategies that move beyond the existing networks of already-engaged citizens.
- CSOs urgently need to rethink their engagement strategies — offering flexible, project-based involvement pathways, clearer messaging about impact, and lower-barrier entry points that can attract citizens who are unwilling to take on long-term commitments but are willing to engage on specific issues or activities.

### Strengthen Sector Coordination and Capacity

- Invest in the development of civil society organisations themselves, including support for digital tools, financial management, communication, and organisational governance. Umbrella organisations and civil society networks should receive sufficient resources to play a stronger supporting role. As one KII respondent recommended, CSOs should “improve coordination and cooperation, including merging organisations working on the same themes within the same territory, in order to pool resources, increase expertise, and strengthen their impact.”
- Protect organisations working on environmental protection, anti-corruption, LGBTQ+ rights, and public interest accountability from political pressure, reputational attacks, and restrictions on their legal standing. Ensuring independence and access to justice for public interest litigation is an essential component of a healthy democratic civic space.

## 7. Conclusion

The France context distils into four insights for the ROOT WB project. The French case demonstrates that civic space pressures can emerge within mature democracies through legitimate legislative processes, declining public investment, and eroding trust in participatory mechanisms — offering Western Balkans partners a necessary corrective to the assumption that EU membership automatically resolves the structural problems they are currently experiencing. The Citizens' Convention for the Climate is the most directly transferable democratic innovation for the project to

study: its process was a successful deliberative experiment, but its failure was in implementation — a cautionary lesson for Western Balkans partners experimenting with citizens' assemblies that deliberative mechanisms must be accompanied by binding commitments to act on outcomes, or they will generate more disillusionment than participation. The "Affaire du Siècle" climate litigation demonstrates the strategic potential of public interest litigation as a civil society accountability tool, while simultaneously illustrating why protecting organisations' legal standing — threatened in France by the CER's accreditation requirements — is a prerequisite for this tool to remain available. Finally, the KII evidence from three very different French organisations reveals themes — financial precarity, the gap between formal participation and actual influence, growing individualism as a barrier to sustained engagement — that resonate directly across all seven ROOT WB partner countries, confirming that the French perspective should function as a comparative EU reference point throughout the project's regional learning activities, not as a contextual outlier.

## REGIONAL COMPARATIVE ANALYSIS

The severity of conditions varies significantly across countries — from Serbia, where major civil society organisations have formally suspended cooperation with state authorities and CIVICUS has downgraded civic space to "repressed," to Albania, where the primary challenge is the absence of enabling domestic conditions rather than active repression. Interventions that are appropriate for one context may be insufficient or unsuitable for another. The comparative analysis aims to map this variation while identifying the underlying structural dynamics that cut across all contexts.

The European Civic Forum's 2026 Civic Space Report provides a precise formulation of the connection between financial vulnerability and political vulnerability that is analytically central to the ROOT WB comparative analysis: the 2025 USAID funding freeze not only forced programme closures and staff reductions across the Western Balkans, but simultaneously "fuelled 'foreign agent' narratives that legitimised raids, stigmatisation and restrictive legislative initiatives." Right-wing and nationalist actors explicitly exploited the funding disruption to intensify smear campaigns against organisations working on human rights, gender equality, LGBTQI+ rights, and with marginalised groups. This sequence — financial shock followed by intensified delegitimisation — confirms that donor dependency is not only a sustainability risk but a political exposure risk: organisations that lose major funding lose the institutional resilience to defend against reputational attacks at precisely the moment those attacks intensify. The report further notes that the funding gap has not been offset by alternative international sources, as other bilateral donors have redirected resources toward defence, Ukraine support, and migration, widening rather than closing the structural vulnerability.<sup>243</sup>

### 1. Political Environment and Civic Space: A Region Under Pressure

All five Western Balkans partner countries and two EU countries demonstrate civic space under pressure, though the nature, intensity, and drivers of that pressure differ substantially. Three distinct civic space trajectories can be identified within the project's partnership.

#### Active and escalating repression

Serbia represents the only case within the partnership where civic space has deteriorated to the point of systemic breakdown. The qualitative distinction from other countries is not the presence of pressure — all partner countries experience pressure — but its combination: legal restriction, administrative harassment, physical surveillance, and the formal suspension of cooperation between major CSOs and state authorities occurring simultaneously. CIVICUS's 2025 downgrade to "**repressed**" reflects not any single development but the cumulative logic of a system in which each instrument of pressure reinforces the others.

#### Politically contested and selectively constrained

Montenegro, Bosnia and Herzegovina, and North Macedonia share a structurally different pattern: **civic space formally exists** but is selectively applied through accumulated institutional decisions rather than a coherent restrictive strategy. What links these three countries is the mechanism, not the intensity — cooperation councils paralysed by administrative transfers rather than legislation, consultation systems deteriorated by procedural neglect rather than prohibition, pressure applied through delegitimisation rather than dissolution. "Foreign agents" initiatives in both Bosnia and Herzegovina and Montenegro are illustrative: they were not adopted, and in the BiH case were annulled — yet their emergence, and the civil society energy required to resist them, is itself evidence of a narrowing environment. Civic space in this band is not closed; it is made costly.

<sup>243</sup>BCSDN / European Civic Forum, Civic Space Report 2026: Western Balkans: <https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-Western-Balkans-European-Civic-Forum-1-1.pdf>



### Structurally constrained but not actively restricted

Albania and Croatia face challenges that are **primarily structural and institutional rather** than political in origin. Neither country demonstrates state hostility toward civil society as such; what they share instead is the accumulated consequence of absent or weakened enabling conditions — underdeveloped domestic funding, strategic vacuums, geographic concentration, and mechanisms that formally exist without producing meaningful outcomes. Croatia's EU membership makes it analytically significant precisely because it demonstrates that structural civic space deterioration does not require political authoritarianism — it can occur through neglect, underfunding, and the gradual drift of institutions away from their mandates.

Across all three bands, a consistent cross-cutting pattern emerges: the deliberate delegitimisation of independent civil society through political and media narratives. The specific instruments differ — formal legislation in Republika Srpska, parliamentary initiatives in Montenegro, spyware and smear campaigns in Serbia, negative information campaigns targeting USAID-funded organisations in North Macedonia — but the underlying logic is the same: to maintain formal compliance with democratic standards while systematically raising the reputational and operational costs of independent civic action. The consistency of this pattern across different political systems, government compositions, and EU accession stages suggests it is not incidental to the region's politics but structural — a shared repertoire of civic space management that transcends individual country contexts and requires a coordinated regional response.

Activities that strengthen CSO communications, public visibility, and community embeddedness are not merely capacity-building measures but civic space protection measures. An organisation that is recognised and trusted by its local community is significantly harder to delegitimise through top-down political narratives.

## 2. The Implementation Gap: Formal Frameworks vs. Living Reality

The single most consistent finding across all Western Balkans country contexts is the gap between formal legal and institutional frameworks for civil society and their practical implementation. This is not a peripheral observation — it is the central structural characteristic of civil society operating environments across the region. Every partner country has formal consultation mechanisms, cooperation councils, and civil society strategies. In every country, these mechanisms are documented as non-functional, bypassed, or applied selectively. The frameworks exist; what is systematically absent is the political will and institutional architecture to make them work.

Western Balkans directly confirms the central finding of this ASSESSMENT REPORTS ON CIVIC PARTICIPATION TRENDS AND BARRIERS 's comparative analysis: "Participation in decision-making remains largely procedural, with weakened consultation mechanisms and civil dialogue." This convergence between the ECF's monitoring findings and the ROOT WB ASSESSMENT REPORTS ON CIVIC PARTICIPATION TRENDS AND BARRIERS 's survey data — in which 53.6% of respondents report only partial policy impact and participation effectiveness is rated at 2.80 out of 5 — strengthens the evidential basis for the consultation-legitimation gap as a structural regional phenomenon rather than a country-specific observation. The ECF further documents that across the region, public funding continues to be channelled toward GONGOs rather than independent watchdogs in Serbia and Bosnia and Herzegovina, and that in North Macedonia, fragmented funding accountability has led directly to service disruptions including the suspension of shelters for survivors of gender and sexual orientation-

based violence — a concrete illustration of what the consultation-legitimation gap and financial precarity together produce at community level.<sup>244</sup>

### Cooperation councils: a structural vulnerability across the region

The fate of government-civil society cooperation councils across the partnership countries illustrates this dynamic most sharply. What these cases share is not a political decision to close civic space — it is a structural design flaw: cooperation mechanisms that exist in government decisions rather than statute can be sidelined by a single administrative act, without any legislative process, at any moment. The consequences range from two-year boycotts and four-year paralysis to formal suspension of cooperation — but the underlying vulnerability is the same across Montenegro, North Macedonia, Serbia, and Bosnia and Herzegovina. Albania and Croatia face the inverse version of the same problem: mechanisms that formally exist but carry no obligation for government to act on CSO input, making participation possible in form but irrelevant in substance.

### The Macedonian paradox: recognised but not institutionalised

North Macedonia represents the clearest regional illustration of what this gap looks like at its most paradoxical: a sector formally recognised as essential to democratic governance — acknowledged as such by the **EU's own Screening Report** — that operates on 3% domestic public funding against a government-committed target of 30%, with a Law on Associations and Foundations promised for 2023 still not delivered. The distance between acknowledgement and resource commitment in North Macedonia is not exceptional — it is a compressed version of a pattern visible across all partner countries. The implementation gap is not primarily a technical problem. It reflects a consistent political choice to maintain the appearance of an enabling framework while preserving executive discretion over how that framework is applied.

The implementation gap is not primarily a technical problem to be solved by better monitoring or more guidelines. Across the region, it reflects a consistent **political choice** to maintain the appearance of an enabling framework while preserving executive discretion over how that framework is applied. Addressing it requires legal reform that replaces discretionary administrative arrangements with enforceable statutory obligations — a legislative agenda that civil society organisations across the region share and that the ROOT WB project should actively support.

## 3. Financial Sustainability: Shared Vulnerabilities, Different Contexts

Financial sustainability is identified as a critical or severe challenge in every partner country without exception. The specific configurations differ, but the underlying structural dynamic is the same: a sector formally recognised as essential to democratic governance is systematically underfunded by domestic public sources and thereby rendered dependent on international donors whose priorities, timelines, and continuity are beyond the sector's control.

### State funding: the 3% problem

Across the Western Balkans, the gap between what governments commit to providing and what they actually allocate is itself a form of the implementation gap described in Section 2. North Macedonia's 3% against a committed 30% is the starkest illustration, but the pattern holds everywhere: Montenegro's mandatory allocation remains below half a percent; Bosnia and Herzegovina's funding is fragmented across fourteen governance levels with no harmonised criteria; Serbia's state support is directed primarily toward government-aligned organisations rather than independent civil society; Albania's domestic funding is insufficient to sustain any meaningful portion of the sector. Croatia is a partial exception, but even there institutional grants have progressively shifted toward EU funding administration. The consequence is not only financial — it is political. Structural dependency on

<sup>244</sup>BCSDN / European Civic Forum, Civic Space Report 2026: Western Balkans: <https://civicspacewatch.eu/wp-content/uploads/2026/05/Civic-Space-Report-2026-Western-Balkans-European-Civic-Forum-1-1.pdf>

international donors exposes organisations to the delegitimisation narrative that they serve foreign rather than domestic interests, which is precisely the strategy documented in Section 1. **Financial vulnerability and political vulnerability** reinforce each other.

### The USAID shock: a stress test for the whole region

The 2025 USAID funding freeze is analytically important not only as a funding crisis but as a structural stress test. Its direct impact was concentrated in North Macedonia — approximately 37 million USD withdrawn, 35 organisations affected, at least 10 losing more than half their funding — but the vulnerability it exposed is present in every partner country: over-concentration of international funding from a small number of donors, with no domestic or diversified source capable of absorbing sudden withdrawal. The secondary effect documented in North Macedonia — a negative information campaign against affected organisations at precisely the moment they were least able to respond — illustrates the compounding logic connecting financial and political vulnerability. When funding collapses, so does the capacity to defend against delegitimisation.

### The emerging legislative risk

The draft NGO Law illustrates a broader regional pattern in which well-intentioned regulatory reforms accumulate into a compliance burden that disproportionately disadvantages smaller organisations. The pattern is not unique to Montenegro — similar dynamics are documented in the ECF 2026 assessment of AML/CFT frameworks in North Macedonia and Albania — but the Montenegrin case is analytically significant because it shows how multiple individually defensible provisions (founder screening, representative qualifications, governance obligations) can combine into a regulatory architecture that systematically privileges professionally managed urban organisations over grassroots community-level ones. This pattern is directly relevant to the ROOT WB project's advocacy for proportionality-based legislative design across the region.

### Projectisation and the sustainability trap

The structural consequence of chronic underfunding and donor dependency is projectisation: organisations adapting their thematic focus, staffing, and activities to available funding calls rather than community-defined priorities. This is documented across every Western Balkans partner country and in Croatia, and its effects are consistent — weak institutional memory, fragmented expertise, staff turnover at the end of every project cycle, and eroded relationships with communities and institutions that take years to build. In Croatia, the dynamic is sharpened by a structural anomaly: public institutions compete for the same EU funding streams as CSOs, forcing civil society into competition with the state rather than an advocacy posture toward it. Projectisation is not a management failure — it is a rational organisational response to a funding architecture that offers no alternative. Addressing it requires changing that architecture, not improving CSO project management skills.

A cross-regional priority recommendation emerging from this is the development of multi-year institutional (core) funding mechanisms for established CSOs, whether through reformed domestic public funding, dedicated EU instruments, or coordinated international donor commitments. The current project-based funding architecture is not a neutral technical arrangement — it is a structural constraint on civil society effectiveness that benefits governments that prefer a fragmented, financially precarious, and donor-dependent civil society sector.

## 4. CSO Capacity and Human Resources: Accumulated Strengths Under Stress

Civil society organisations across the partnership countries have accumulated significant expertise over decades — in EU accession monitoring, human rights documentation, anti-corruption advocacy, community organising, and social service provision. This accumulated capacity is a genuine regional asset. The challenge documented across all partner countries is not its absence but its fragility: the sector's human resource base is under structural stress from multiple directions simultaneously, and

the mechanisms driving that stress are consistent enough to constitute a regional pattern rather than a collection of national problems.

### The talent pipeline paradox

The most striking cross-country finding on CSO capacity is a paradox: the same sector-wide investment in expertise that makes civil society indispensable to democratic governance is simultaneously depleting its own human capital. Experienced professionals move into government, international organisations, academia, or the private sector — taking with them the institutional knowledge, networks, and policy expertise that took years to build. Montenegro's 2020 transition, in which approximately half of the new government's professional staff came from civil society, is the most dramatic documented instance, but the dynamic is visible in varying degrees across the region. What differs by country is the primary driver: in Serbia and North Macedonia, it is emigration and burnout under sustained political pressure; in Croatia, it is a widening salary gap created by public sector pay increases that project-anchored CSO budgets cannot match; in Albania, it is youth emigration that continuously removes the next generation of civic leaders before they take root locally. The result is the same everywhere — succession crises, institutional memory gaps, and organisations structurally dependent on individuals rather than systems.

### Geographic concentration as structural inequality

Geographic concentration of civil society capacity is documented in every partner country, and the analytical significance is the same in each case: it is not primarily a resource distribution problem but a democratic legitimacy problem. A sector structurally concentrated in capital cities cannot credibly claim to represent the society it advocates for. The organisations working in communities most distant from power — in northern Montenegro, in rural North Macedonia, in smaller Bosnian cantons, in Albanian regions outside Tirana, in non-Belgrade Serbia — are precisely those with the fewest resources to sustain that work. The ROOT WB project's geographic design is therefore not an equity question but a strategic one: activities that reproduce the capital city concentration will reproduce the legitimacy deficit.

### Digital capacity as a growing dividing line

Digital capacity has become a dividing line within civil society that cuts across all partner countries, separating organisations that can function effectively in a digitised operating environment from those that cannot. The specific dimension of this gap differs by context — cybersecurity as an operational prerequisite in Serbia, digital financial management under AML/FATF compliance in North Macedonia, basic digital transition in rural Croatia, information environment navigation in Montenegro — but the structural consequence is the same: organisations without adequate digital capacity are progressively excluded from the funding, communication, and advocacy opportunities that sustain civil society work. Digital support is therefore not a supplementary capacity-building activity but a prerequisite for access to the sector's basic operating infrastructure.

The digital divide within civil society — between organisations that have successfully developed digital capacities and those that have not — is increasingly becoming a factor that determines not only communication effectiveness but organisational survival. As donor reporting, advocacy, fundraising, and community engagement all move online, organisations without digital capacity are progressively excluded from the resources and opportunities that sustain civil society work.

## 5. Citizen Participation and Trust: The Gap That Feeds Itself

Across all partner countries, formal mechanisms for citizen participation exist and formal participation rates are low. This co-existence is not a coincidence — it reflects a self-reinforcing dynamic that is one of the most analytically important findings of the comparative analysis.

### The consultation-legitimation gap

The structural feature shared by participatory mechanisms across all partner countries is the absence of any binding obligation for institutions to act on what citizens and CSOs contribute. The consequence is not merely that individual consultations are ineffective — it is that the repeated experience of ineffective consultation produces rational abstention. Citizens and CSOs who have learned that participation does not influence outcomes have good reasons not to participate. The gap feeds itself: low trust produces low engagement, which produces mechanisms that function as legitimisation exercises rather than genuine participation channels, which produces lower trust. France is analytically significant here precisely because it demonstrates that this dynamic is not a feature of weak or transitional democracies alone — an internationally recognised deliberative innovation can generate the same frustration when its outputs are not acted upon.

### Reactive participation as a civic health indicator

The contrast between low formal participation and high issue-based mobilisation across all partner countries is not evidence of civic disengagement — it is evidence of rational civic behaviour. Citizens participate when participation produces visible results. What is absent are not willing citizens but institutional pathways capable of channeling existing civic energy into sustained, continuous engagement. This is the most important design implication for the ROOT WB project: the energy exists and can be activated. The question is whether the project creates conditions in which participation visibly matters.

### Trust deficits and their civic consequences

The most analytically significant finding on trust is not its depth but its structure. Trust in civil society is consistently higher than trust in political institutions across the region — but this advantage is instrumentally conditional rather than principled. Citizens trust CSOs for what they deliver, not for what they represent, making **civil society's public legitimacy susceptible** to the same delegitimisation strategies documented in Section 1.

Building genuine public trust in civil society — as distinct from functional recognition — requires CSOs to invest in locally embedded relationships and community-level engagement that demonstrate tangible public benefit to citizens who are not already part of civil society networks. This is a long-term investment that cannot be delivered through project-based programming alone.

## 6. Youth and Marginalised Groups: Structural Exclusion Across Contexts

Youth disengagement, emigration, and the structural exclusion of marginalised groups from civic participation are documented in every partner country. The specific configurations differ, but the underlying dynamics are consistent enough to constitute a regional pattern.

### Youth emigration as a civic infrastructure problem

Youth emigration is a civic infrastructure problem, not only a demographic one: it removes from local communities precisely the active, educated, and internationally connected people who form the backbone of civil society. What differs by country is the compounding factor — in North Macedonia, the collapse of mid-career professionals in the active CSO workforce from 25% to 4% between 2021 and 2024 indicates an accelerating succession crisis; in Serbia, burnout compounds emigration; in Albania, the pipeline depletes before it embeds locally. The common consequence is organisations structurally dependent on individuals rather than institutional capacity, and communities losing their most civically active members before they can anchor locally.

### Marginalised communities and compounded exclusion

Roma communities face the most consistently documented pattern of compounded civic exclusion across all Western Balkans partner countries — geographic, linguistic, economic, and informational

barriers reinforcing each other in the absence of targeted civic infrastructure or Roma-specific participation approaches. Women and LGBTI persons face documented hostility in public life across multiple partner countries, extending from hate speech and smear campaigns in the Western Balkans to funding restrictions in France. The cross-country consistency of these patterns indicates that gender-based and ethnicity-based civic exclusion are not country-specific problems but regional dynamics that require regional responses.

### The youth participation infrastructure deficit

Every Western Balkans partner country lacks adequate infrastructure for sustained youth civic participation — unstable youth centres, absent national youth programmes, municipalities that do not involve young people in policymaking at all. This is both a present challenge and a future crisis: the gap between the civic energy young people demonstrate in informal and protest settings and the institutional infrastructure available to sustain that energy in long-term democratic engagement is one of the most consequential structural failures this analysis documents.

The region-wide youth participation infrastructure deficit is both a present challenge and a future crisis. The gap between the civic energy that young people demonstrate in protest and informal mobilisation, and the institutional infrastructure available to sustain that energy in long-term democratic engagement, is one of the most consequential structural failures documented in this analysis.

## 7. Cross-Cutting Recommendations for the ROOT WB Project

The following recommendations are grounded in the cross-country patterns identified in this analysis. They are addressed to different target audiences but share a common premise: the challenges documented here are structural, not accidental, and require structural responses — in law, in funding architecture, and in the design of participation mechanisms.

| Target audience             | Priority recommendation                                                                                                                                                                         |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| International donors & EU   | Prioritise multi-year institutional (core) funding over project-based grants; coordinate emergency responses to abrupt donor withdrawals through a regional civil society resilience mechanism. |
| International donors & EU   | Condition EU accession support on documented implementation of enabling environment commitments, not only legal alignment.                                                                      |
| International donors & EU   | Treat cybersecurity support as a democratic governance priority, not a technical add-on.                                                                                                        |
| National governments        | Anchor cooperation mechanisms with civil society in statute rather than government decisions.                                                                                                   |
| National governments        | Introduce binding feedback obligations in public consultation systems; replace secondary legislation funding criteria with criteria in law.                                                     |
| National governments        | Ensure pending legislation affecting civil society is designed on proportional principles that protect smaller, community-rooted organisations from disproportionate compliance burdens.        |
| National governments        | Invest in youth participation infrastructure and adopt national youth programmes where absent.                                                                                                  |
| Civil society organisations | Invest in community embeddedness and local visibility as civic space protection; build regional solidarity mechanisms for practical support.                                                    |



| Target audience             | Priority recommendation                                                                                                                                                                                    |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Civil society organisations | Engage collectively in advocacy for structural change rather than adapting individually to each government's configuration.                                                                                |
| ROOT WB project             | Design activities that produce visible, traceable participation outcomes; prioritise geographic reach outside capital cities; integrate digital security and media literacy as prerequisites, not add-ons. |

## CSO SURVEY FINDINGS

|                               |                       |                               |                                     |
|-------------------------------|-----------------------|-------------------------------|-------------------------------------|
| <b>291</b><br>Valid responses | <b>7</b><br>Countries | <b>31</b><br>Survey questions | <b>Apr–Jun 2026</b><br>Field period |
|-------------------------------|-----------------------|-------------------------------|-------------------------------------|

An online survey of civil society organisations was conducted across all seven ROOT WB partner countries **between April and June 2026** as part of the Assessment reports on civic participation trends and barriers (WP2). A total of **291 valid responses** were collected: 249 from the six Balkan countries using a common English-language questionnaire and 42 from France using an equivalent questionnaire developed in French. The French dataset was translated and harmonised for comparative analysis. The survey comprised 31 questions covering organisational profile, capacities and support needs, financial sustainability, participation in public decision-making, the civic environment, barriers, and priorities for change.

### Headline findings

- Funding is the overriding concern. Two-thirds of organisations (67.4%) name fundraising as their single biggest support need — about double any other — and 66.6% describe their funding as unstable.
- Civil society is dangerously donor-dependent. Two-thirds (66.7%) rely on international donors, rising to 93.2% in Serbia — the vulnerability the 2025 USAID freeze exposed in real terms.
- Participation happens, but rarely pays off. Only 8.2% of organisations take part in nothing, yet they rate the effectiveness of their participation just 2.80 out of 5, and only 35.1% say it led to tangible change. This is the consultation–legitimation gap measured directly.
- The civic environment is closing, not opening. A majority in six of the seven countries say it is worse than three years ago. Serbia is the most restrictive (86.4%); Albania is the only positive outlier (53.7% call it ‘enabling’).
- Institutions are experienced as closed. Average institutional openness is 2.65 out of 5, with Serbia at 1.59, reflecting formally suspended government–CSO cooperation.
- Citizens withdraw out of distrust, not apathy. In open-text answers, distrust and a sense of powerlessness (107 of 186 responses) outweigh every other barrier, and making consultation binding and accountable is the most-requested change.

| Country                | N  | % of total |
|------------------------|----|------------|
| Croatia                | 47 | 16.2%      |
| Serbia                 | 44 | 15.1%      |
| Bosnia and Herzegovina | 44 | 15.1%      |
| Montenegro             | 43 | 14.8%      |
| Albania                | 41 | 14.1%      |
| France                 | 41 | 14.1%      |

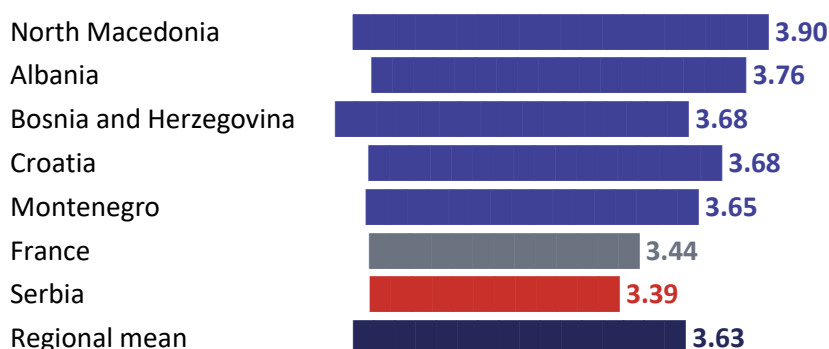
| Country         | N   | % of total |
|-----------------|-----|------------|
| North Macedonia | 31  | 10.7%      |
| Total           | 291 | 100%       |

(Country distribution of surveys)

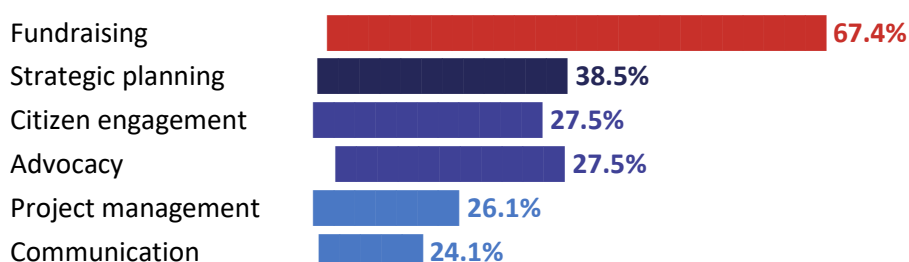
The vast majority of respondents (~90%) represent civil society organisations (associations and foundations). By **thematic field**, the most represented areas are social inclusion (15.5%), youth (11.3%), human rights (10.0%), governance and rule of law (8.9%), and environment (8.9%). By **size**, 52.2% have 3–10 staff, 17.9% have 11+ staff, and 15.5% have 0–2 staff. By **geographical scope**, 38.5% operate nationally, 24.4% locally, and 22.7% regionally. In terms of **annual budget**, 27.5% operate between 50–200k EUR and 27.1% above 200k EUR, while 11.7% operate below 10k EUR.

Respondents were asked to assess their organisation's overall capacity on a scale of 1 to 5. The **regional mean is 3.63**, indicating a moderately positive self-assessment consistent with findings from the desk research and KIIs. Relatively high self-assessed capacity scores should be read in conjunction with the financial sustainability findings: organisations may be experienced and effective in their programmatic work while remaining structurally fragile due to unstable funding.

#### Overall Capacity by Country (Mean Score, 1–5)



#### Areas Where CSOs Need Most Support



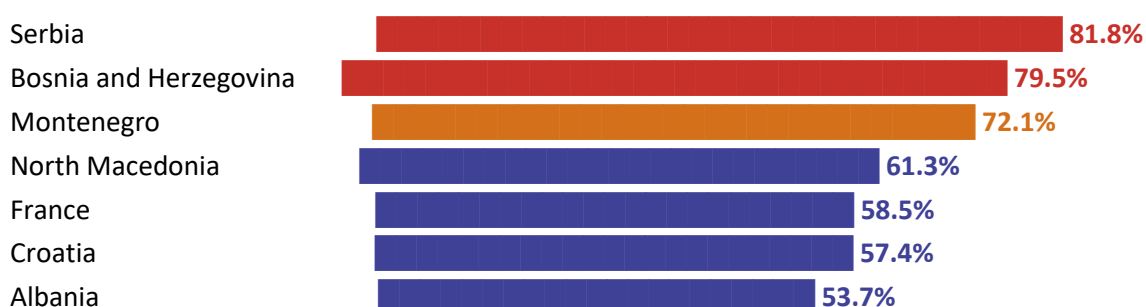
The survey reveals a sector that is moderately self-confident in its operational capacity — with a regional mean of 3.63 out of 5 and no country falling below 3.39 — but acutely aware of its structural vulnerability. The gap between capacity self-assessment and support needs tells the real story: organisations that rate themselves as functionally competent nonetheless identify **fundraising as their primary need** by an overwhelming margin (67.4%), far ahead of any programmatic or organisational skill. This is not a capacity deficit in the conventional sense — it is a sustainability deficit. The ROOT WB project's capacity-building design must therefore treat financial sustainability not as a supplementary track but as the foundational precondition for everything else the sector is already capable of doing.

### Funding Stability

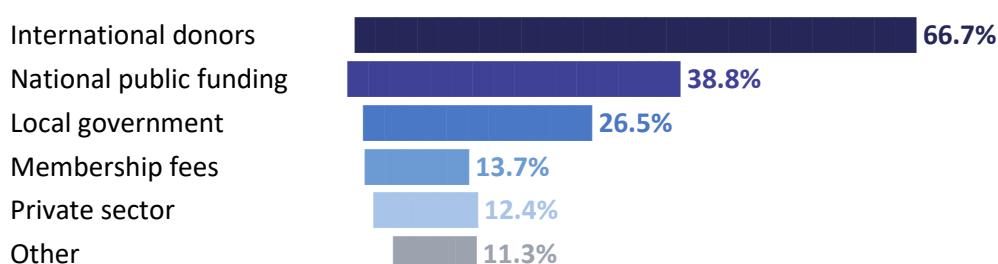
The survey confirms the financial fragility of civil society across all partner countries. Regionally, **66.6% of respondents report unstable funding** — 51.5% "somewhat unstable" and 15.1% "very unstable" — while only 33.3% describe their funding as stable.

| Funding stability | % of respondents |
|-------------------|------------------|
| Somewhat unstable | 51.5%            |
| Stable            | 33.3%            |
| Very unstable     | 15.1%            |

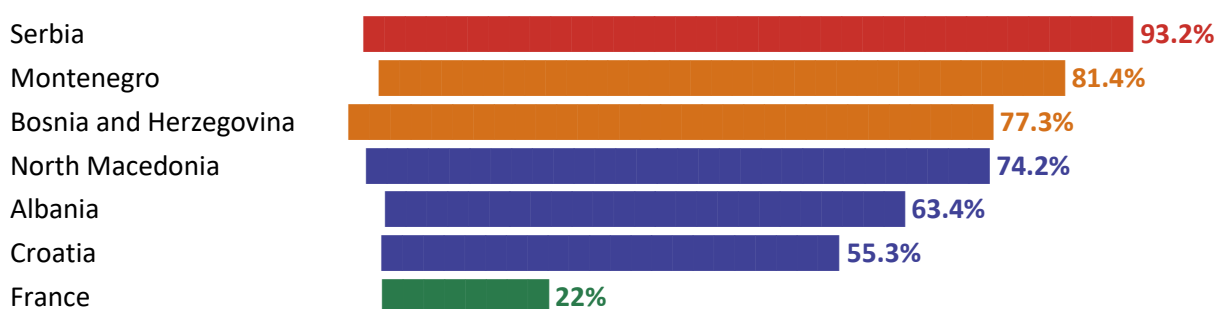
### % Reporting Unstable Funding — by Country



### Main Funding Sources (% citing each source)



### International Donor Dependency — by Country



The financial sustainability data reveals two compounding vulnerabilities that together define the sector's structural condition. First, **funding instability is the norm rather than the exception across the region** — with Serbia (81.8%) and Bosnia and Herzegovina (79.5%) at the extreme end but no country below 53%. Second, **international donors are the dominant funding source** for 66.7% of organisations overall, rising to over 90% in Serbia — meaning that instability and dependency are not separate problems but the same problem: a sector chronically underfunded by domestic sources has no buffer when international funding shifts. The France-Western Balkans contrast is analytically important here: France's 22% international donor dependency reflects a structurally different

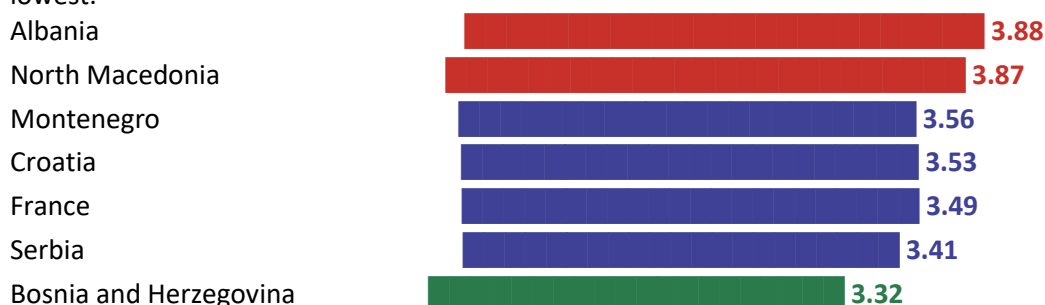
challenge — domestic funding contraction — that confirms the pattern from the opposite direction. In every country, regardless of context, the sector lacks a stable, diversified domestic financial base. The 2025 USAID funding freeze did not create this fragility — it exposed it.

### Number of Funding Sources

| Number of sources | % of respondents |
|-------------------|------------------|
| 2–3 sources       | 48.1%            |
| 4+ sources        | 43.3%            |
| 1 source only     | 8.6%             |

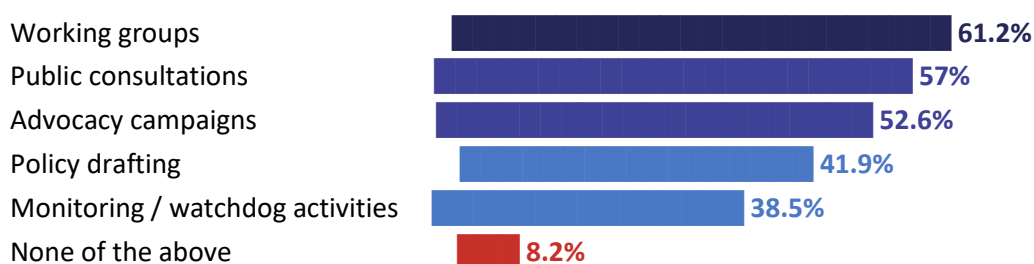
### Difficulty Accessing Funding

Regional mean: 3.56 / 5 — indicating substantial difficulty across the region. Albania (3.88) and North Macedonia (3.87) report the highest access difficulties; Bosnia and Herzegovina (3.32) reports the lowest.



Access difficulty scores cluster remarkably closely across the region — ranging from 3.32 to 3.88 on a five-point scale — suggesting that the barrier to funding is not primarily a country-specific problem but a structural regional condition. The slight variation is analytically interesting: Albania and North Macedonia score highest not because their environments are most hostile, but because their domestic funding infrastructure is weakest, leaving organisations most exposed to the complexity of international grant applications. Bosnia and Herzegovina's relatively lower score likely reflects the historically broader international donor presence in the country rather than genuinely easier access conditions. Taken together with the instability and dependency data, these scores confirm that the funding challenge facing the region's civil society is systemic — not a matter of individual organisational capacity to navigate grants, but of a funding architecture that is structurally misaligned with the sector's needs.

### Types of Processes CSOs Participate In (% of respondents)



With 91.8% of respondents participating in at least one formal process, CSO disengagement from institutional mechanisms is not the problem. The sector is present — in working groups, consultations,

advocacy campaigns, and policy drafting — across all partner countries. This makes the low effectiveness scores and partial policy impact documented elsewhere in the survey analytically significant: the bottleneck is not participation but outcomes. Civil society is doing its part of the democratic bargain; **the deficit lies on the institutional side**, in the absence of binding obligations for governments to act on what CSOs contribute.

### Frequency of Participation in Decision-Making

| Frequency    | Local level  | National level |
|--------------|--------------|----------------|
| Regularly    | 20.3%        | 19.6%          |
| Occasionally | 41.6%        | 36.1%          |
| Rarely       | 25.4%        | 29.9%          |
| Never        | <b>12.0%</b> | <b>13.7%</b>   |

### Effectiveness of Participation

Regional mean: 2.80 / 5 — below the midpoint. The country-level variation is the most analytically significant finding in the entire survey.



Two findings stand out from the participation frequency and effectiveness data read together. First, "occasionally" is the modal participation pattern at both local and national level — meaning that even among organisations that do participate, sustained regular engagement remains the exception. Second, the effectiveness mean of 2.80 out of 5 confirms that participation, when it happens, is not perceived as productive. Serbia's 2.17 is not an outlier in kind but in degree: it reflects the same consultation-legitimation gap present across the region, accelerated to its logical endpoint by the formal suspension of cooperation mechanisms. North Macedonia's relatively higher score (3.29) is instructive in the opposite direction — it suggests that working group engagement can maintain a degree of perceived effectiveness even when formal cooperation structures have broken down, pointing to the importance of technical-level relationships that survive political turbulence. The overall picture is of a sector that participates episodically and experiences that participation as only partially effective — a pattern that rational actors will eventually respond to by participating less.

### Has Participation Led to Tangible Changes?



| Answer    | % of respondents |
|-----------|------------------|
| Yes       | 35.1%            |
| Partially | 53.6%            |
| No        | 11.3%            |

The 53.6% "partially" majority is the most analytically precise quantification of the consultation-legitimation gap in the entire survey. It captures something that neither "yes" nor "no" would — a sector that is not failing outright but is systematically falling short: present in the process, occasionally moving the needle, but rarely seeing its positions fully implemented. Read alongside the participation frequency and effectiveness data, the picture is consistent: CSOs participate episodically, experience that participation as moderately effective, and see their work translate into partial outcomes at best. The 11.3% who report no tangible change at all are likely concentrated in the most repressive contexts — Serbia above all — but the "partially" majority cuts across all countries. This is not a crisis of access; it is a crisis of follow-through, and it is structural.

### Assessment of the Civic Environment

|                                                         |                                                            |                                                                   |
|---------------------------------------------------------|------------------------------------------------------------|-------------------------------------------------------------------|
| <b>86%</b><br>Serbia: 'Restrictive' — highest in sample | <b>54%</b><br>Albania: 'Enabling' — only positive majority | <b>54%</b><br>All countries: environment 'Worse' than 3 years ago |
|---------------------------------------------------------|------------------------------------------------------------|-------------------------------------------------------------------|

### Overall Environment for CSOs — by Country

| Country         | Enabling % | Neutral % | Restrictive % |
|-----------------|------------|-----------|---------------|
| Albania         | 53.7%      | 36.6%     | 9.8%          |
| North Macedonia | 25.8%      | 58.1%     | 16.1%         |
| France          | 12.2%      | 70.7%     | 17.1%         |
| Montenegro      | 16.3%      | 60.5%     | 23.3%         |
| Bosnia & Herz.  | 11.4%      | 50%       | 38.6%         |
| Croatia         | 10.6%      | 42.6%     | 46.8%         |
| Serbia          | 2.3%       | 11.4%     | 86.4%         |

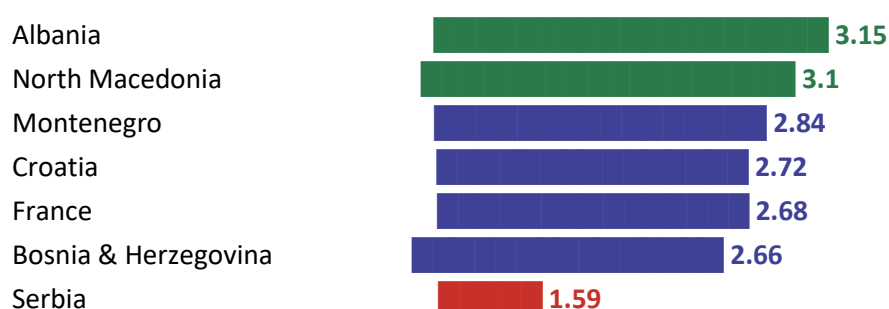
### Environment vs. 3 Years Ago — by Country

| Country         | Better % | Same % | Worse % |
|-----------------|----------|--------|---------|
| Albania         | 56.1%    | 26.8%  | 14.6%   |
| Montenegro      | 20.9%    | 39.5%  | 39.5%   |
| Croatia         | 12.8%    | 36.2%  | 51.1%   |
| Bosnia & Herz.  | 11.4%    | 31.8%  | 56.8%   |
| North Macedonia | 9.7%     | 32.3%  | 58.1%   |
| Serbia          | 11.4%    | 2.3%   | 86.4%   |
| France          | 0%       | 0%     | 68.3%   |

The environment assessment data confirms and quantifies the deterioration trajectory documented across all country contexts, but three findings deserve particular analytical attention. First, the Serbia-Albania contrast is not simply a spectrum from worst to best — it reflects qualitatively different types of civic space challenge: Serbia's 86.4% restrictive assessment reflects active and escalating repression, while Albania's 53.7% enabling assessment reflects structural constraints without political hostility. These require fundamentally different project responses. Second, Croatia's 46.8% restrictive assessment is the most analytically uncomfortable finding in the dataset: an EU member state, post-accession, with a higher restrictive rating than Montenegro or North Macedonia. It quantifies the argument made throughout this analysis that EU membership does not automatically produce an enabling civic space environment. Third, France's trajectory — 68.3% worse, 0% better — is a sharp reminder that deterioration is not a Western Balkans phenomenon: it is occurring across different political systems, institutional contexts, and democratic traditions simultaneously.

### Institutional Openness

Regional mean: 2.65 / 5. Serbia's score of 1.59 is the lowest by a wide margin, reflecting the formal suspension of CSO–government cooperation.



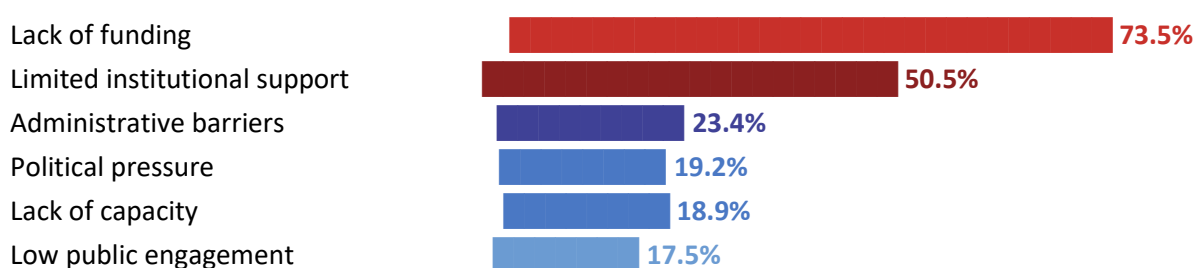
### Public Trust in CSOs and Citizens' Willingness to Participate

| Country         | Public trust in CSOs (Q24) | Citizens willing to participate (Q25) |
|-----------------|----------------------------|---------------------------------------|
| France          | 3.37                       | 3.34                                  |
| Albania         | 3.10                       | 3.02                                  |
| North Macedonia | 3.06                       | 2.84                                  |

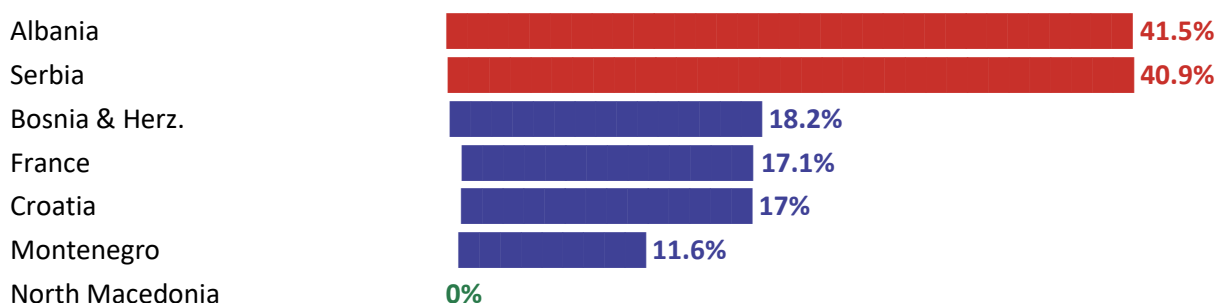
| Country        | Public trust in CSOs (Q24) | Citizens willing to participate (Q25) |
|----------------|----------------------------|---------------------------------------|
| Montenegro     | 3.07                       | 2.84                                  |
| Bosnia & Herz. | 2.95                       | 2.68                                  |
| Croatia        | 2.79                       | 2.83                                  |
| Serbia         | 2.64                       | 3.11                                  |
| Regional mean  | 2.99                       | 2.95                                  |

When asked to identify their organisation's top two barriers, **lack of funding (73.5%)** and **limited institutional support (50.5%)** dominate overwhelmingly, followed by administrative barriers (23.4%), political pressure (19.2%), lack of capacity (18.9%), and low public engagement (17.5%).

#### Top Barriers — All Countries (% citing each barrier)



#### Political Pressure as Barrier — by Country (Q26)

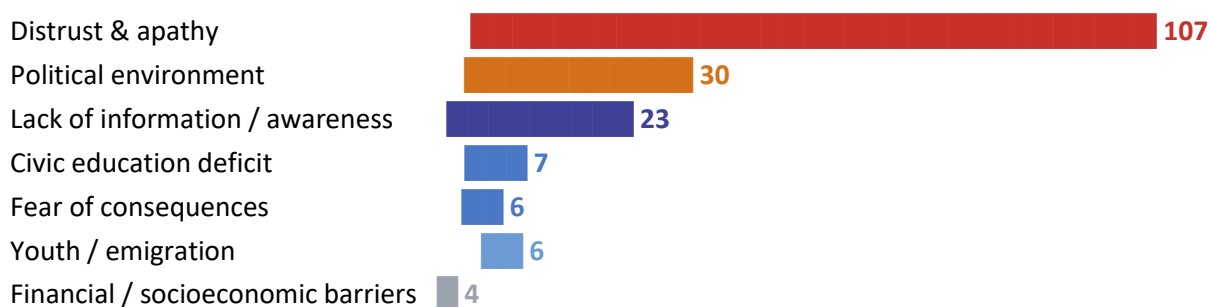


The dominance of "**lack of funding**" (73.5%) and "**limited institutional support**" (50.5%) as the top two barriers confirms, through a third independent question, what the financial sustainability and environment data already established — these are structural realities consistently documented across all methods in this assessment. The **political pressure** data reveals a more nuanced picture. Serbia's 40.9% is consistent with everything else the survey documents about that context. North Macedonia's 0% almost certainly reflects sample composition rather than the absence of political pressure in a country where the desk research documents sustained institutional erosion. Albania's 41.5% is the finding that warrants most careful interpretation: it sits alongside Albania's 53.7% enabling environment assessment and the desk research characterisation of Albania as structurally constrained but not actively hostile to civil society. The most plausible reading is that political pressure in Albania is **organisationally targeted rather** than sector-wide — concentrated among organisations working on environmental protection, anti-corruption, and minority rights — rather than a generalised feature of the operating environment. This distinction matters for project design: a sector where pressure is targeted requires different protective strategies than one where it is systemic

## Open-Text Responses

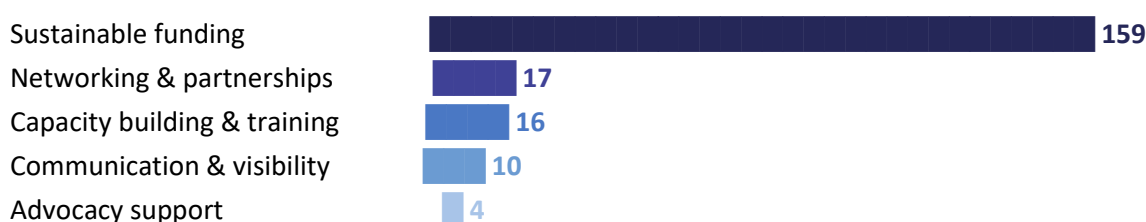
### Barriers to Citizen Participation (n = 186 coded responses)

The dominant theme across all countries is **distrust and apathy**: 107 respondents primarily cite citizens' lack of trust in institutions, sense of powerlessness, disillusionment, and political fatigue. This is followed by the political environment as a structural constraint (30), lack of information and awareness (23), civic education deficits (7), fear of consequences (6), and youth-specific issues including emigration (6).



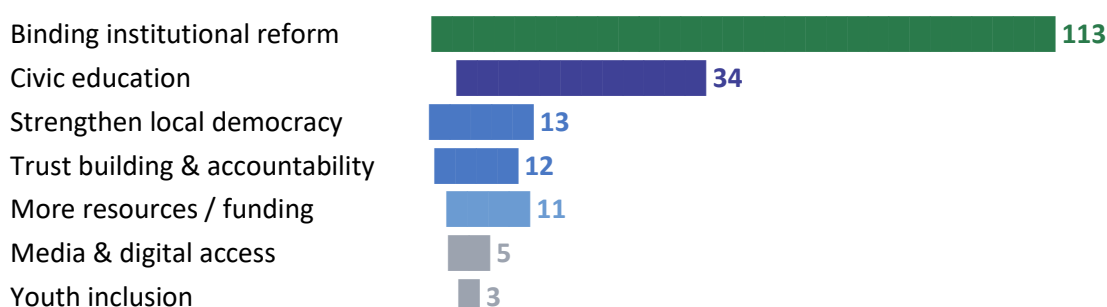
### Support That Would Most Help (n = 207 coded responses)

Open-text responses are dominated by **sustainable funding** as the primary need (159 respondents), confirming the closed-question finding with striking consistency. Respondents consistently emphasise multi-year, operational grants rather than short-term project funding as the most important systemic change.



### Changes to Improve Civic Participation (n = 191 coded responses)

Open-text responses are thematically led by **institutional reform** (113 respondents) — primarily the reform of public consultation mechanisms to make them binding, transparent, and accountable. This is followed by civic education (34), strengthening local democracy (13), trust building (12), and resource allocation (11).



Citizens don't participate because they don't believe it matters. CSOs need stable funding above all else. The most-demanded systemic change is binding, accountable consultation. Together, these describe the same structural circuit: institutions that don't act on input produce distrust, distrust produces disengagement, disengagement allows institutions to continue not acting.

The survey describes a civil society sector that is capable and confident in its work but structurally fragile in its foundations: underfunded, dependent on a narrow set of

international donors, and operating in a civic environment it experiences as narrowing rather than widening. On this evidence, the single most consequential investment is multi-year core funding, and the single most consequential reform is making public consultation genuinely accountable.

## RECOMMENDATIONS

Across 291 survey responses, 20 key informant interviews, and systematic desk research in seven countries, **five findings emerge** with sufficient consistency and analytical weight to deserve explicit attention beyond the country and thematic analyses in which they are documented.

The first is that **Serbia** represents a qualitatively different situation from the rest of the partnership — not the worst point on a spectrum, but a different category. **The combination of active digital surveillance of activists, formal suspension of CSO–government cooperation, regulatory changes that explicitly remove civil society from EU accession consultations, and a 93.2% international donor dependency rate does not describe a strained civic space.** It describes a civic space architecture in the process of dismantlement. The ROOT WB project must design its Serbia activities accordingly — not on the assumption of institutional responsiveness, but on the assumption of its absence.

The second is that **Albania** is the only country in the partnership where a majority of respondents report that the **civic environment has improved over the past three years** — and this requires careful interpretation. **Albania's absolute civic space conditions remain among the most structurally weak in the sample:** enabling legislation is underdeveloped, domestic funding is insufficient, civil society is geographically concentrated in Tirana, and youth emigration continuously depletes the sector's human capital. **What the survey captures is not a strong civic space but a positive trajectory: the absence of political hostility toward civil society, combined with concrete institutional developments** — the establishment of the Agency for Support of Civil Society and the momentum of EU accession negotiations — **has created a measurable sense of progress relative to the previous period.** The distinction between absolute condition and direction of change matters analytically: Albania demonstrates not that structural challenges are resolved, but that they can be addressed through sustained institutional effort in the absence of deliberate political obstruction.

The third is **Croatia's** 46.8% restrictive environment rating. For Western Balkans partners who frame EU accession as the solution to civic space problems, **the fact that an EU member state — post-accession, with a developed institutional framework — produces a higher restrictive rating than Montenegro or North Macedonia is the most uncomfortable finding in the entire assessment.** It demands a more honest conversation about what accession does and does not guarantee.

The fourth is the convergence of the open-text survey responses. Three questions asked from different directions — what stops citizens from participating, what would most help CSOs, and what systemic change is most needed — independently produce the same answer: **distrust that participation matters, the need for sustainable funding, and binding institutional reform.** This methodological convergence across 291 respondents, combined with identical findings from 24 KIs and the desk research, is the strongest possible signal that these are structural realities, not perceptions.

The fifth is CEDEM's five citizens' assemblies in Montenegro — three in partnership with the European Parliament. In a region where the gap between civic energy and institutional participation pathways is one of the defining problems, this represents a tested, internationally recognised model for bridging that gap. It is not only a Montenegrin achievement, but a regional proof.

The following recommendations are immediately actionable within existing legal and institutional frameworks. Others require statutory or structural change that no single actor can deliver unilaterally. A third group represents long-term investments whose effects will not be visible within a single project cycle but without which shorter-term interventions will not hold.

### Three levels of recommendation



**Immediately actionable** — Changes that can be made within existing legal and institutional frameworks, requiring political will and operational decisions rather than new legislation or resources. Delayed implementation is a choice, not a constraint.

**Structurally necessary** — Changes that require legal reform, statutory anchoring, or institutional redesign. These cannot be delivered by any single actor and require sustained advocacy and political negotiation. They are the conditions without which project-level interventions will not produce durable results.

**Long-term investment** — Changes whose effects accumulate over years rather than project cycles: civic education, trust rebuilding, demographic stabilisation, cultural shifts in governance. No project delivers these alone, but projects that are not designed with these objectives in mind actively work against them.

The recommendations that follow are addressed to four audiences — international donors and EU institutions, national governments, civil society organisations, and the ROOT WB project specifically — but many require coordinated action across more than one actor. Where that is the case, it is noted.

### Recommendations by priority and audience

| Priority               | Audience                  | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Immediately actionable | International donors & EU | Coordinate emergency responses to abrupt funding disruptions through a regional civil society resilience mechanism. The USAID shock demonstrated that delayed response compounds financial and reputational damage simultaneously. A standing coordination protocol would allow transitional support to mobilise within weeks rather than months.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Immediately actionable | National governments      | Introduce binding feedback obligations in existing public consultation systems: require institutions to publish, within a fixed period after a consultation closes, a document explaining which inputs were incorporated and why others were not. This requires no new law — only implementation of existing regulatory obligations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Immediately actionable | National governments      | Conduct proportionality impact assessments before adoption of any legislation affecting civil society, specifically examining the cumulative effect of multiple provisions on smaller, volunteer-run, and community-rooted organisations. The Montenegrin NGO Law illustrates a broader regional pattern in which individually defensible provisions — founder screening, representative qualifications, governance obligations — combine into a compliance burden calibrated to professionally managed organisations rather than grassroots realities. Any regulatory impact assessment should test draft legislation against organisations with limited staff, no legal support, and infrequent governance meetings, and should be conducted with meaningful civil society participation before parliamentary adoption. |

| Priority               | Audience                    | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Immediately actionable | National governments        | Ensure that pending legislation affecting civil society across the region is designed on proportional principles: obligations calibrated to organisational size and capacity, not applied uniformly regardless of resources. Regulatory reform that imposes uniform compliance burdens disproportionately disadvantages the smallest, most community-rooted organisations — precisely those least able to absorb additional administrative costs.                                                                                                                                                                                                             |
| Immediately actionable | Civil society organisations | Invest in community embeddedness and local visibility as civic space protection. An organisation trusted by its local community is significantly harder to delegitimise through top-down political narratives. This is a strategic priority, not a communication activity.                                                                                                                                                                                                                                                                                                                                                                                    |
| Immediately actionable | ROOT WB project             | Design all participatory activities to produce visible, traceable outcomes — not only to build CSO capacity to engage, but to create documented cases in which engagement changes something. These cases are the most effective counter-narrative to citizen scepticism about whether participation matters.                                                                                                                                                                                                                                                                                                                                                  |
| Structurally necessary | International donors & EU   | Prioritise multi-year institutional (core) funding for established civil society organisations, replacing or significantly supplementing project-based grant mechanisms. The current funding architecture is a structural constraint on civil society effectiveness, not a neutral technical arrangement.                                                                                                                                                                                                                                                                                                                                                     |
| Structurally necessary | International donors & EU   | Condition EU accession support on documented implementation of enabling environment commitments — functioning cooperation councils, published consultation feedback, funding criteria in law rather than secondary legislation — not only on technical legal alignment.                                                                                                                                                                                                                                                                                                                                                                                       |
| Structurally necessary | International donors & EU   | Support the establishment of independent domestic civil society funds in Western Balkans partner countries, modelled on existing mechanisms in Croatia and the region, as a structural alternative to project-based international donor dependency. North Macedonia's government-committed target of 30% state funding as a share of CSO revenues — against a documented reality of 3% — illustrates the scale of the gap between stated policy commitments and funded reality. Independent funds insulated from annual budget cycles and political discretion are the most durable structural response to the donor dependency documented across the region. |
| Structurally necessary | National governments        | Anchor cooperation mechanisms with civil society in statute rather than government decisions. The paralysis of cooperation councils across Montenegro, North Macedonia,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| Priority               | Audience                    | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                        |                             | and Serbia was triggered by administrative decisions, not legislation. Only statutory protection prevents recurrence.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Structurally necessary | National governments        | Require all ministries to prepare and publish annual consultation plans, making it possible for CSOs and citizens to anticipate and prepare for legislative processes in advance rather than responding reactively to late-stage consultations. Annual planning obligations — documented as entirely absent in North Macedonia — are a low-cost, high-impact mechanism for improving the quality and timeliness of civic participation without requiring new legislation in most partner countries.                                                                                                                                            |
| Structurally necessary | National governments        | Replace funding criteria established in secondary legislation with criteria in law, with independent oversight. In Montenegro, North Macedonia, Bosnia and Herzegovina, and Serbia, key funding decisions rest on secondary legislation — a political choice that preserves executive discretion over which organisations receive support.                                                                                                                                                                                                                                                                                                     |
| Structurally necessary | National governments        | Adopt dedicated anti-SLAPP legal frameworks implementing the EU Anti-SLAPP Directive's principles in all partner countries, with particular urgency in North Macedonia and Serbia, which are documented among the top ten European countries for SLAPP cases. Strategic litigation against civil society actors — journalists, human rights defenders, environmental activists — functions as a civic space restriction mechanism that operates entirely within formal legal frameworks and is therefore invisible to standard civic space assessments. Its absence from most national legal frameworks is a structural gap, not an oversight. |
| Structurally necessary | Civil society organisations | Engage collectively in advocacy for structural change — on funding frameworks, consultation obligations, and SLAPP protection — rather than adapting individually to each government's configuration. The structural problems documented in this analysis require structural solutions that individual organisations cannot achieve alone.                                                                                                                                                                                                                                                                                                     |
| Structurally necessary | ROOT WB project             | Use the regional comparative analysis systematically in advocacy communications. The cross-country patterns documented here demonstrate that civil society challenges are structural and regional, not accidental and national — a framing that is more compelling to both domestic and international audiences than country-by-country accounts.                                                                                                                                                                                                                                                                                              |
| Long-term investment   | National governments        | Invest in youth participation infrastructure: stable funding for youth centres, extension of Youth Guarantee programmes to all municipalities, and adoption of National Youth Programmes where absent. The region-wide youth participation infrastructure deficit is a long-term democratic resilience                                                                                                                                                                                                                                                                                                                                         |

| Priority             | Audience                    | Recommendation                                                                                                                                                                                                                                                                                                                          |
|----------------------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |                             | problem; time-limited projects cannot substitute for sustained institutional investment.                                                                                                                                                                                                                                                |
| Long-term investment | International donors & EU   | Invest in cybersecurity infrastructure and training for civil society across the region as a democratic governance priority. In Serbia, surveillance of activists is documented. Across the region, digital security is an operational prerequisite for civil society work, not a technical add-on.                                     |
| Long-term investment | Civil society organisations | Diversify funding sources strategically, treating donor concentration as an organisational risk. Build regional solidarity mechanisms for practical support — sharing digital security infrastructure, legal expertise, documentation methodologies, and psychological support resources.                                               |
| Long-term investment | ROOT WB project             | Integrate digital security and media literacy into all capacity-building streams as prerequisites, not specialist add-ons. Prioritise geographic reach outside capital cities with explicit equity targets — without deliberate design choices, project activities will reproduce the urban concentration they are intended to address. |

## CONCLUSION

This Assessment reports on civic participation trends and barriers set out to map conditions. What it found, across three methods and seven countries, is a system — one in which underfunding, delegitimisation, formal-but-ineffective participation mechanisms, and human capital depletion do not occur in isolation but reinforce each other in a self-sustaining logic. That is the central analytical result: not a list of problems, but a circuit. Without intervention, its trajectory is predictable. Organisations that cannot retain staff lose institutional memory; organisations without institutional memory become less effective at advocacy; organisations that are less effective become easier to dismiss as unnecessary; organisations that are dismissed receive less domestic funding; organisations without domestic funding become more dependent on international donors; organisations dependent on international donors become more exposed to delegitimisation as foreign-funded actors; and delegitimised organisations struggle to recruit and retain staff. The loop closes. Each country in this assessment is at a different point in that loop — Serbia furthest along, Albania with the most distance still to travel — but the direction is consistent, and without structural intervention, the destination is the same: a civil society sector that is formally present, institutionally marginalised, financially precarious, and publicly distrusted.

What this assessment also found, however, is that the civic energy required to break this circuit exists. Citizens mobilise — in Serbia, in Albania, in Bosnia and Herzegovina, in France — when participation produces visible results. CSOs engage — in working groups, consultations, advocacy campaigns — despite the low returns. The problem is not motivation. It is architecture: a **funding architecture** that rewards project delivery over institutional strength, a legal architecture that preserves executive discretion over statutory obligation, and a participation architecture that collects input without acting on it. These are design choices, not natural conditions. They can be redesigned.

The structural changes that need to happen — cooperation mechanisms anchored in law, funding criteria removed from secondary legislation, consultation systems made binding — are most achievable now, while the political case for reform is strongest. What this assessment documents are both the urgency and the foundation: the evidence base is there, the regional patterns are clear, and the organisations capable of acting on them exist.







# ROOT WB

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