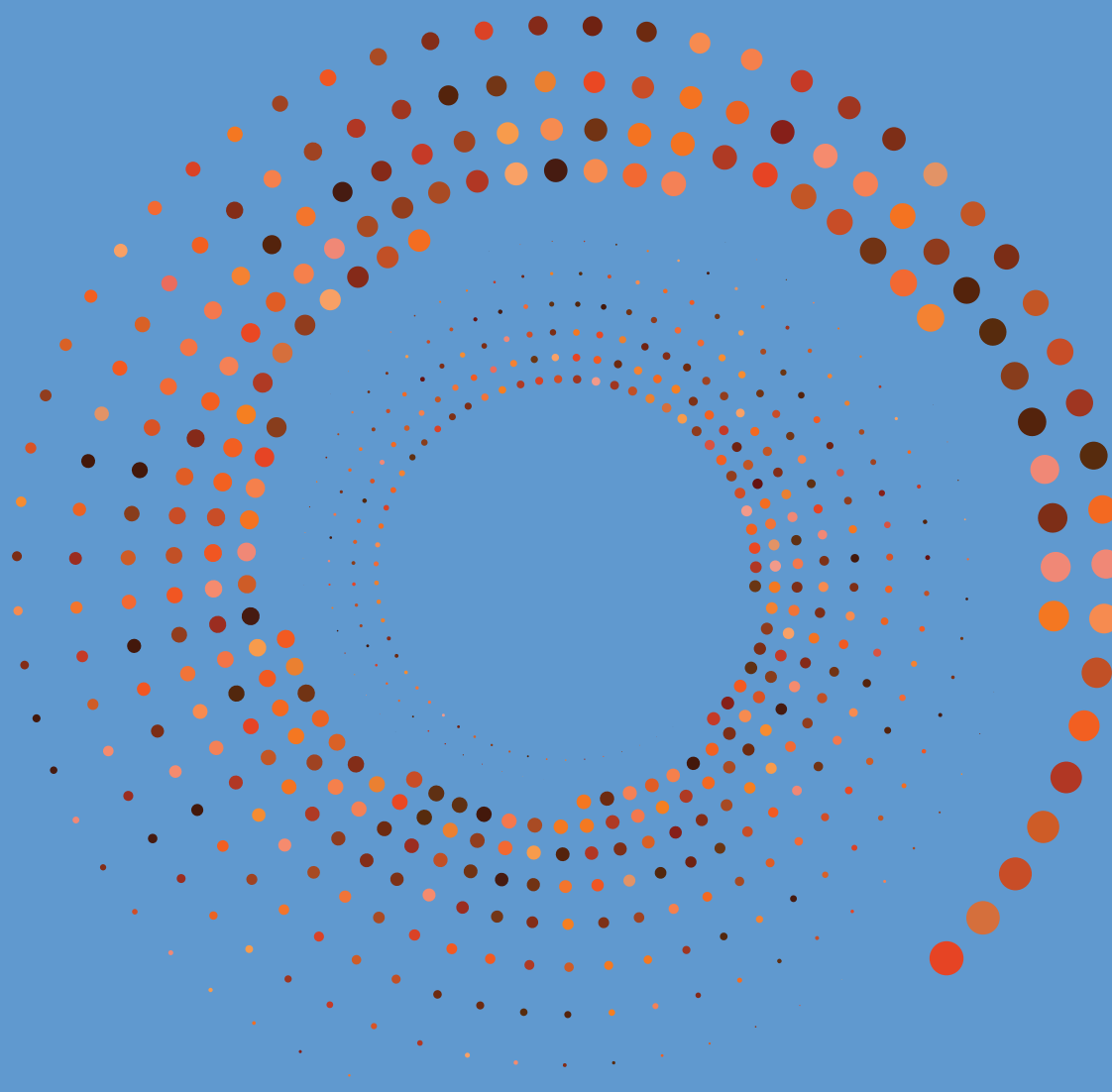


DG NEAR Guidelines for EU Support to Civil Society
in the Enlargement Region
2021-2027

2025 Assessment

REPORT FOR SERBIA





This study was carried out by a team of experts under the supervision of the Hajde4EU project.

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List of Abbreviations

AML	Anti-Money Laundering
AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
API	Application Programming Interface
BCHR	Belgrade Centre for Human Rights
BCSDN	Balkan Civil Society Development Network
BIA	Security Information Agency
BIRN	Balkan Investigative Reporting Network
BOS	Belgrade Open School
CIVICUS	World Alliance for Citizen Participation
CSO	Civil Society Organisation
CRTA	Centre for Research, Transparency and Accountability
DEI	Diversity, Equality and Inclusion
DG ENEST	Directorate-General for Enlargement and Eastern Neighbourhood
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
EC	European Commission
ECF	European Civic Forum
ECHR	European Convention on Human Rights
ECtHR	European Court of Human Rights
EU	European Union
EUD	EU Delegation
EUR	Euro
FAMA	Feminist–Antifascist Network
FRA	European Union Agency for Fundamental Rights
GONGO	Government-Organised Non-Governmental Organisation
HR	Human Resources
HRBA	Human Rights Based Approach
ICCPR	International Covenant on Civil and Political Rights
IPA	Instrument for Pre-accession Assistance
JIS	Unified Information System
KII	Key Informant Interview



* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence

KOMS	National Youth Council of Serbia
LGBTIQ+	Lesbian, gay, bisexual, transgender, intersex, queer
MFRR	Media Freedom Rapid Response
MLJMPDD	Ministry of Human and Minority Rights and Social Dialogue (Serbian abbreviation)
MP	Member of Parliament
NBS	National Bank of Serbia
NCEU	National Convention on the European Union
NGO	Non-Governmental Organisation
NES	National Employment Service
NUNS	Independent Journalists' Association of Serbia
ODIHR	Office for Democratic Institutions and Human Rights
OSCE	Organisation for Security and Co-operation in Europe
RCC	Regional Cooperation Council
REM	Regulatory Authority for Electronic Media
RSD	Serbian Dinar
RTS	Radio-Television of Serbia
RTV	Radio-Television of Vojvodina
SLAPP	Strategic Lawsuit Against Public Participation
SNS	Serbian Progressive Party
SO	Specific Objective
TACSO	Technical Assistance for Civil Society Organisations
UN	United Nations
USAID	United States Agency for International Development
YUCOM	Lawyers' Committee for Human Rights

Methodology

Common methodology (Western Balkans and Türkiye)

This assessment applies the common methodology used across the seven targeted countries to assess the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027, Hajde4EU's principal recurring analytical product, delivered annually as seven national reports and one regional report. It is an upstream advisory exercise for DG ENEST B1 and the EU Delegations and EU Office in Kosovo*, in which CSOs and independent media are subjects of analysis and dialogue partners, not direct beneficiaries.

The 2025 cycle applies the official, slightly revised methodology, retained to preserve comparability with the 2021 baseline and the 2023 and 2024 TACSO assessments. Assessment is organised around three Specific Objectives, scored through approximately 55-59 indicators, each combining an indicator-based grade with a qualitative narrative:

SO	Dimension assessed	What it measures
SO1	Legal and financial enabling environment	Registration, operation, freedoms of association/assembly/expression; state funding, fiscal framework, financial viability.
SO2	Public authority - civil society cooperation	Consultation and cooperation mechanisms, their mandate and effectiveness, inclusiveness (incl. HRBA-inclusive composition).
SO3	CSO capacity, sustainability and effectiveness	Organisational capacity, accountability, networking, and effectiveness in influence and service delivery.

Prior-year scores (2021-2024, particularly under SO3, are reference points only, not comparison baselines, due to inter-year methodological changes that widened the assessment's scope. For 2025, regional summary reports from the FRA Civic Space Update, ECF Civic Space Watch and the BCSDN Monitoring Matrix are appended where available for comparability, but not merged into the scoring.

Coordinators for IPA beneficiaries (and dedicated enabling-environment experts where needed) gather country-level evidence through a mixed-methods design: legal and desk review; structured online questionnaires targeting three groups (general CSOs, expert CSOs competent in the enabling environment, and public administration); key informant interviews; and focus groups. Evidence is processed through indicator-based scoring and qualitative narratives, verified through national validation meetings in June 2026 and internal Key Expert review, with working-draft consultation where agreed with EUDs. Internal or restricted Commission documents may inform data collection but are not cited.

Serbia - country-specific approach to the methodology

The 2025 assessment for Serbia is based on desk review, dedicated legal analysis, survey data, specialised CSO input, key informant interviews and validation feedback. These sources are read together rather than in isolation. The General CSO Survey provides quantitative CSO percentages, the Specialised

CSO Survey provides qualitative expert input used to confirm, nuance or challenge wider survey and desk-review findings, and the Public Institutions Survey provides an institutional perspective and a means of triangulation, not a substitute for CSO experience.

Evidence base at a glance

Instrument	Responses	Notes
General CSO Survey	104	104 in final export (84 named an organisation, 20 left the optional field blank); 104 Serbia-coded in the raw file, used for respondent-level aggregation; denominators vary by question
Specialised CSO Survey	2	Circulated to 15 expert organisations; 2 substantive responses
Public Institutions Survey	15	7 central, 1 regional, 7 local
Key informant interviews	3	Qualitative triangulation; not statistically representative
Validation meeting	1	In person, 19 June 2026, Belgrade

Survey data

The General CSO Survey, which was publicly available and open to all CSOs, was distributed from 20 May to 5 June 2026 via the Hajde4EU email database and platforms (LinkedIn¹, Facebook²), the communication channels of the National Resource Centre / Belgrade Open School (BOS³, the EU Delegation to Serbia and national CSO networks, with targeted outreach to grassroots and local organisations. It was further disseminated to grassroots and local organisations through direct invitations and one-to-one follow-up by the Coordinator for Serbia. The questionnaire was anonymous and consisted for the most part of closed questions. As not every respondent answered every question, the number of valid answers typically decreases as the questionnaire progresses. Unless stated otherwise, the percentages in this report are calculated against the valid responses to each question rather than the full sample. In total 104 valid responses from general CSOs in Serbia were recorded and used where respondent-level aggregation was required.

The Specialised CSO Survey was addressed to 15 expert organisations and networks of which two provided substantive responses: one working on security, rule of law, transparency and accountability, and one on community building, the enabling environment for CSOs, human rights, public participation and the rule of law. Its purpose was qualitative: to let expert voices confirm, qualify or push back against what the General CSO Survey and the desk review suggested. The two substantive responses received were used for triangulation and validation of the General CSO survey findings and desk-review analysis.

The Public Institutions Survey, in turn, went to central, regional or entity-level and local bodies with experience of working with CSOs. The 15 responses received (seven from central government, one from regional-level government and seven from local self-government offer the institutional side of the picture and a point of triangulation, but it is not a stand-in for the experience of civil society itself.

¹ Hajde4EU, LinkedIn: <https://www.linkedin.com/company/hajde4eu/>

² Hajde4EU, Facebook: <https://www.facebook.com/Hajde4EU>

³ Belgrade Open School (BOS): <https://www.bos.rs/>

Public institutions were reached through the database of contact points for cooperation with civil society maintained by the Ministry for Human and Minority Rights and Social Dialogue.

Respondent profile and reach

CSO respondents were concentrated in Belgrade (32 of 104, or 31%), but also included organisations from Novi Sad, Subotica, Niš and smaller towns across the country. Around 57% of identifiable CSO respondents were women and 41% men, with the remaining entries unclear. By geographic scope of work, 35% of respondents operated nationally, 25% locally, 23% regionally or sub-nationally and 17% internationally. The public institutions outreach included seven local administrations alongside central and regional-level institutions; the aggregate survey export did not allow systematic cross-tabulation by level of administration for all indicators.

Other relevant respondent information: *(Percentages as reported; totals may not sum to 100 due to rounding or multiple response options.)*

Serbia	
Type of CSO	89% registered association; 6% registered foundation; 1% not-for-profit company; 1% registered platform/network; 1% unregistered organisation; 1% unregistered citizens initiative; 1% vocational/professional organisation or union
Scope of work	35% national; 25% local; 23% regional/sub-national/entity; 17% international
Position in the CSO	37% President; 16% Manager; 15% Executive director; 12% Project staff; 2% Expert/consultant; 20% other
Thematic fields: top 5	40% youth and youth rights; 39% human rights; 37% environment and climate action; 34% social inclusion; 33% public participation in policy and decision-making
Thematic fields: bottom 5	5% rights of older people; 4% open data; 4% consumer protection; 4% animal rights; 3% amateur sports
Age	4% between 18-35; 91% between 36-65; 5% 66+

Key informant interviews

Three key informant interviews were integrated into the report. They were used as qualitative triangulation and are not treated as statistically representative evidence.

Two interviews were held with representatives of the EU Delegation to Serbia covering Media and Civil Society portfolios: the first, on 4 June 2026, focused on freedom of expression and media and CSO participation in decision-making; the second, on 5 June 2026, focused on the three freedoms and available support to CSOs. The third interview was held with a representative of the National Resource Centre (Belgrade Open School) on 18 June 2026, focusing on the enabling environment for CSOs and cooperation and partnership between CSOs and public institutions.

Validation

A validation meeting was held in person on 19 June 2026 at Belgrade Open School. Invitations were extended to eight representatives and four participated, from Belgrade Open School, the Independent Journalists' Association of Serbia, Civic Initiatives and the Trag Foundation. The meeting reviewed the accuracy and completeness of the draft findings and the proposed SO1-SO3 ratings. Feedback was used to clarify selected findings, in particular that freedom of association, peaceful assembly and freedom of expression should be assessed separately in future cycles given their differing 2025 trajectories; that AML/CFT-related banking due-diligence burdens on CSOs should be reflected more fully in the narrative; that the participation of informal and grassroots groups warranted reconsideration; that the public-funding narrative should be supplemented with 2025 Budget Law data; and that reduced disclosure by some CSOs reflects security-driven risk mitigation rather than weak governance.

Interpretation and context

Survey results are interpreted as indicative findings and read together with desk review, interview evidence and validation feedback. The findings should be read against a marked deterioration in 2025 in freedom of expression and, to an extent, freedom of peaceful assembly in practice, including over 550 recorded media-freedom and journalist-safety violations and the detention and expulsion of foreign civil society representatives from an event; an increased AML/CFT-related compliance burden on CSO banking relations; and the withdrawal of USAID funding, which affected CSO funding diversification and increased scrutiny of organisations receiving foreign funding.



Executive Summary

This report presents the findings of the 2025 assessment of Serbia's civil society environment against the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021–2027. The reporting period was marked by sustained political and civic unrest triggered by the November 2024 Novi Sad railway-station canopy collapse, which prompted the largest and most sustained wave of student- and citizen-led protests in over a decade and a hostile institutional response towards civil society, including the February 2025 police raids on prominent CSOs and repeated restrictions on assembly, expression and access to information. In December 2025 the CIVICUS Monitor downgraded Serbia's civic-space rating from "obstructed" to "repressed", reflecting a sharp deterioration in implementation even as the formal legal framework remained largely unchanged. Against this backdrop, the assessment finds a widening gap between broadly stable legal guarantees and a rapidly deteriorating practical environment. Across almost every indicator, public institutions' self-assessments remained consistently positive, while CSO-reported experience pointed towards growing pressure and exclusion, revealing a substantial and persistent perception gap between the state and civil society.

Specific Objective 1 – Conducive Environment for Civil Society:

Specific Objective 1 examines whether the legal, institutional and financial environment enables civil society organisations to operate freely, independently and sustainably. It assesses the protection of the fundamental freedoms of association, peaceful assembly and expression, safeguards against undue interference, the proportionality of regulatory requirements, access to domestic and foreign funding, public financial and non-financial support, taxation, philanthropy and volunteering, as well as the overall enabling environment for both registered organisations and informal civic initiatives.

Serbia's legal framework continued to formally guarantee freedom of association, peaceful assembly and expression in 2025, with no substantive legislative changes, but the exercise of these freedoms deteriorated markedly in practice. Civic Initiatives' monitoring recorded 554 documented violations of the three freedoms during the year, more than in 2022, 2023 and 2024 combined (309 concerning expression, 189 assembly and 56 association). **In February 2025, police raided the offices of five prominent CSOs**, including Civic Initiatives, CRTA, the Trag Foundation, the Policy Center and KOMS, citing alleged misuse of foreign funds, while stigmatising "foreign agent" rhetoric continued, with 34% of CSOs reporting smear campaigns by public authorities. The draft Law on Agents of Foreign Influence remained in parliamentary procedure without adoption, and the Government proposed Criminal Code amendments in September 2025 that would criminalise peaceful road blockades. **Assemblies were repeatedly restricted**, including the banning of the Pride Caravan in Kruševac and a March 2025 Belgrade protest of over 300,000 people marked by allegations of a sonic crowd-control device, which prompted an interim measure from the European Court of Human Rights.

Access to effective remedies and protection from threats weakened considerably. Some 49% of surveyed CSOs reported government decisions that negatively affected their work in 2025, more than double the 21% recorded in 2024, while 46% reported that their organisation or members had been subject to threats or physical attacks, compared with 19% in 2024; formal complaints nonetheless remained rare, submitted by only around 17-20% of affected organisations. Foreign civil society representatives were expelled or barred from entering the country, and human rights defenders reported being targeted by spyware.

The AML/CFT framework became a more prominent area of concern in 2025. New secondary legislation, including a Ministry of Finance rulebook and National Bank of Serbia guidelines, **increased compliance and due-diligence expectations for CSOs** and explicitly flagged crowdfunding, virtual currencies and cash donations as high-risk indicators, creating a disproportionate burden for smaller, community-based organisations. Reported discriminatory restrictions tied to funding sources rose sharply to 18% of CSOs, from 6% in 2024, and 11% reported being prevented from opening bank accounts or sending and receiving funds, up from 2% in 2024. A new Law on the Central Record of Beneficial Owners, adopted in March 2025, treats CSOs and businesses equally as “registered entities,” avoiding disproportionate statutory reporting requirements, even as banking-level documentation demands increased in practice.

Small and unregistered organisations continued to operate without formal registration, **but lacked the operational capacities of registered CSOs**, especially regarding independent transactions and access to public funding. In practice, structural barriers to participation persisted: newer, smaller and non-Belgrade-based organisations reported working-group participation of just 20%, compared with 50% among older, larger, Belgrade-based CSOs.

The **legal framework for CSO funding remained broadly permissive**, and 95% of surveyed CSOs reported no direct government interference in accessing funding, consistent with previous years. Planned 2025 state-budget allocations to non-governmental organisations amounted to approximately RSD 11.6 billion (EUR 99 million), though no comprehensive data on amounts actually disbursed was available. **CSO perceptions of the transparency and fairness of domestic public funding remained overwhelmingly negative**, with only 14% rating it positively against 86% rating it poorly, and independent analyses by BOS, BIRN and Civic Initiatives documented public funds being awarded to organisations with links to governing parties or with little demonstrable capacity or track record. **Tax incentives for individual and corporate giving remained unchanged and limited**, and the proportion of the population donating to charity fell to 36% in 2025, from 43% in 2024.

Volunteering remained inadequately supported. The 2010 Law on Volunteering remained unchanged and no National Volunteering Strategy was adopted. Only 6% of CSOs reported benefiting from state employment programmes, a continued decline from 9% in 2024, and while 15% reported benefiting from government volunteering programmes, qualitative responses indicated this mostly reflected organisations’ own self-organised volunteer engagement rather than structured state support. **CSO employment represented 0.57% of registered employment in 2025, broadly stable**, while the proportion of the population volunteering rose to 15%, from 13% in 2024.

Specific Objective 2 – Cooperation and Partnership between CSOs and Public Institutions:

Specific Objective 2 assesses whether civil society organisations are meaningfully involved in public decision-making processes and whether institutional mechanisms enable regular, transparent and inclusive dialogue between civil society and public authorities. The assessment covers the legal framework governing public consultations, the quality of consultation processes, participation in policy development and EU accession processes, as well as the effectiveness of institutional structures established to support government-civil society cooperation.

Serbia’s normative framework for public consultation, including the eKonsultacije portal and mandatory public-hearing requirements, **remained formally in place**, but a 2025 amendment to the Government’s Rules of Procedure introduced a mechanism allowing **the Government to bypass public hearings** where it unilaterally determines that prior consultations resolved all outstanding issues. Only 24% of CSOs reported having access to draft documents from the beginning of the process and 30% were given at least 15 days to comment; when both effectiveness criteria were required to be met

simultaneously within the same consultation, only 9% qualified, down from a headline participation figure of 64% under the less stringent single-criterion measure. **Working-group participation was also uneven:** CSOs working on gender equality, LGBTIQ+ rights and minority rights engaged in open consultations at rates of 82-89%, yet were represented in formal working groups at only around 23%, below the 31% average. In February 2025, **twenty-eight leading CSOs, together with the National Convention on the European Union and several media associations, suspended cooperation with legislative and executive authorities**, citing the absence of genuine institutional responsiveness.

Serbia retained a formally adopted and currently valid civil society cooperation strategy throughout 2025, the Strategy for Creating an Enabling Environment for the Development of Civil Society 2022–2030, **accompanied by a budgeted Action Plan for 2025-2026 valued at approximately EUR 2.1 million**, of which EUR 1.07 million was allocated from the state budget, with the remainder dependent on 46 donor-funded activities. Despite this formal continuity, only 2% of CSOs considered the strategy both relevant and effective in 2025, down from 9% in 2024, and the coordinating Ministry of Human and Minority Rights and Social Dialogue continued to operate with limited dedicated resources.

The Council for Creating an Enabling Environment for the Development of Civil Society retained its formal architecture, including a work programme and rules of procedure, but its **CSO members froze their participation from January 2025** in protest at the lack of institutional response to attacks on civil society, and no further sessions were recorded during the year, leaving the mechanism non-functional in practice despite its intact legal basis.

Specific Objective 3 – CSO Capacities and Resilience:

Specific Objective 3 assesses the organisational capacity, sustainability and resilience of civil society organisations. It examines internal governance, strategic and financial management, accountability, organisational learning, communication, evidence-based work, stakeholder engagement and financial sustainability, recognising that resilient civil society organisations require not only an enabling legal environment but also sound governance systems, professional management, diversified resources and the capacity to adapt to changing political, economic and social circumstances.

Internal governance indicators showed apparent improvement in 2025, partly reflecting revised survey methodology: 96% of CSOs reported having a governing body and 99% a governing document, with 79% reporting both an effective governing body specifically, up from 49% in 2024. Regular conflict-of-interest screening also improved, with 48% of CSOs conducting annual checks, although 14% reported never conducting such checks. **Transparency in sharing governance information remained the sector's clearest weakness**, with only 18% of CSOs publishing their governing document, structure and board membership together, and comprehensive human resources policies remained almost entirely absent, with just 1% of CSOs reporting all listed policies in place, consistent across every reporting cycle.

Communication and evidence-based practice remained strong. All surveyed CSOs used at least one online communication channel, led by Facebook (86%), Instagram (76%) and organisational websites (75%), and media partnerships rose to 51% in 2025, from 30% in 2024. Some 80% of CSOs undertook at least one form of research to inform their work, and 91% engaged stakeholders through consultation or partnership. **Network membership remained high at 80%**, and cross-sectoral partnerships with academia, social partners and the private sector rose to 56%, from 49% in 2024, although links with organised labour remained the weakest of all stakeholder relationships.

Funding diversification and human-resource sustainability presented the most significant concerns. **Some 65%** of CSOs reported diversified donor income, a modest increase from 59% in 2024, but the sector remained heavily dependent on foreign and bilateral funding, with 30% of CSOs deriving more than half their budget from bilateral government donors and 22% from the EU. The suspension of

USAID funding and wider cuts in US foreign assistance had an immediate impact on the sector's human resources: the proportion of CSOs employing at least one paid staff member fell sharply to 58% in 2025, from a consistent share of around 70% in prior years, with several respondents directly attributing staff reductions to the funding contraction. Funds from sources other than donors became more widespread, reported by 78% of CSOs compared with 74% in 2024, though such income typically supplemented rather than sustained organisational budgets.



IPA beneficiary Assessment

Specific Objective 1: A conducive environment for civil society to carry out its activities is in place.

SO 1.1 | All individuals and legal entities in the Enlargement Region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely.

Indicator 1.1.a – Extent to which relevant domestic legislation provides that:

- ➔ Associations can be established or registered without discrimination on any grounds.
- ➔ No unlawful restrictions are placed on the scope of their activities or pursuit of their objectives.
- ➔ Their termination may only occur following a decision by an independent and impartial court.
- ➔ No unlawful restrictions are placed on freedom of peaceful assembly.
- ➔ Freedom of expression is exercised by all, and no unlawful restrictions are imposed.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	3 – moderately meets standards

Serbia's legal framework continues to formally guarantee freedom of association, peaceful assembly and expression. However, the exercise of these freedoms deteriorated further. In its global ratings report on civic freedoms in December 2025, the CIVICUS Monitor downgraded Serbia from "obstructed" to "repressed". This trend is corroborated by Civic Initiatives' 2025 monitoring matrix data, which recorded a total of 554 instances of violations of the three freedoms, more than in 2022, 2023 and 2024 combined. Of these, 309 concerned freedom of expression, 189 freedom of assembly, and 56 freedom of association.⁴

Regarding the establishment or registration of associations and organisations, there were no new laws or bylaws introduced in 2025 that changed the legal framework for their establishment. In terms of implementation, the situation has worsened compared with the previous year. While the Serbian Constitution formally guarantees the freedom of association in line with international human rights standards, practical conditions do not adequately respect these guarantees. A hostile environment, characterised by negative campaigns and verbal attacks by high-level officials against civil society members, has created a chilling effect that discourages citizens from forming new organisations. Compared with the 2024 report, which highlighted the risk of arbitrary application and selective enforcement

⁴ Figures provided by Civic Initiatives (monitoring matrix for 2025) during the validation workshop with civil society, June 19th, 2026.

of broadly formulated restrictions on associations, the continued stigmatisation of CSOs in 2025 has further discouraged civic engagement.

The key challenge that remains is the persistent political pressure and rhetoric that deters citizens from freely exercising their right to associate, keeping the practical situation misaligned with international democratic standards.

Regarding restrictions on the scope of activities or the pursuit of objectives of associations and organisations, the legal framework remained unchanged in 2025 without any new legislative amendments. However, the practical implementation significantly deteriorated, as state authorities increasingly used administrative harassment and informal pressures to restrict the scope of civil society activities. An illustrative case occurred in February 2025, when members of the Criminal Police Directorate and the Special Anti-Corruption Department raided the premises of several prominent Serbian civil society organisations, including Civic Initiatives (CI), the Centre for Research, Transparency and Accountability (CRTA), the Trag Foundation, the Policy Center and the National Youth Council of Serbia (KOMS).⁵ The police cited alleged misuse of foreign funds, and the Administration for the Prevention of Money Laundering requested detailed financial data from banks without specifying concrete criminal acts, though no judicial proceedings followed.

Although the draft law on agents of foreign influence submitted in late 2024 was not debated or adopted, rhetoric portraying CSOs as “foreign agents”⁶ continued during 2025, particularly in relation to foreign and USAID funding. Some 34% of CSOs reported experiencing smear campaigns by public authorities.⁷ Concerns about arbitrary pressure were further reinforced by police actions involving USAID-funded organisations and requests by the Anti-Money Laundering Directorate to examine the bank accounts of prominent activists.⁸

Regarding the termination of associations and organisations, there were no new legislative provisions or amendments introduced in 2025 that altered the rules or reasons for their termination. The situation regarding forced terminations remained stable in practice, as there were no reports of the government unlawfully dissolving or terminating associations in 2025. Just as in the 2024 report, there were no high-profile cases of the Constitutional Court banning organisations or authorities terminating them outside the legal framework.

Throughout 2025, freedom of association faced sustained, multi-layered pressure shaped by institutional pressure, stigmatising public rhetoric, media-driven targeting campaigns, and physical and digital attacks against individuals, organisations and informal civic initiatives, with narratives portraying critical CSOs and activists as “foreign agents” or destabilising actors reinforcing the chilling effect of the proposed “foreign agents” legislation.

The legal framework for peaceful assembly, primarily the 2016 Public Assembly Act, did not change in 2025. However, the practical situation regarding the restriction of freedom of peaceful assembly worsened. Compared with 2024, the environment for civic participation eroded, leading international monitors to downgrade Serbia’s civic space rating from obstructed to repressed.⁹ The challenges that have remained include the lack of clear legal definitions for spontaneous assemblies, the mandatory notification requirements, and the broad discretionary powers of the authorities to ban gatherings. To justify and explain the assessment, it is important to highlight that the government proposed restrictive amendments to the Criminal Code in September 2025 instead of adopting progressive reforms.¹⁰

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⁵ <https://balkaninsight.com/2025/02/25/serbian-police-raids-reputable-ngos-over-usaid-money/bi/>

⁶ <https://informer.rs/hronika/vesti/993557/nvo-usaid-crta-gradjanska-inicijativa-tuzilastvo>

⁷ 2025 data CSO survey

⁸ <https://radar.nova.rs/drustvo/uprava-za-sprecavanje-pranja-novca-kriticari/>

⁹ <https://civicspacewatch.eu/alert/civics-monitor-downgrades-six-european-countries-due-to-severe-deterioration-of-civic-space/>

¹⁰ <https://www.bbc.com/serbian/articles/c75qvqzl2lzo/lat>

Although not adopted by the end of the year, these proposed amendments aimed to criminalise peaceful blockades by penalising the mere placement of obstacles or stopping of vehicles on roadways with up to one year of imprisonment. These proposals reflect a clear deterioration in the state's approach to civic activism and illustrate an intent to narrow the space for public participation by turning typical protest actions into criminal offences. Compared with the 2024 report, the proposed changes to the Criminal Code directly threatened the principles established by the United Nations Human Rights Committee, specifically through the unadopted proposal to criminalise the online coordination of assemblies. Furthermore, among the practical challenges that remained, the authorities had not implemented by the end of 2025 the relevant recommendations of the OSCE Office for Democratic Institutions and Human Rights and the Venice Commission, illustrating a continuous disregard for international human rights law.¹¹ This assessment reflects the continued reliance of the state on outdated frameworks that do not protect online assemblies or adequately guarantee the safety of protesters from third-party violence.

In 2025, the authorities actively banned several public assemblies in Serbia and obstructed the effective realisation of this freedom in other ways. The situation further deteriorated compared with 2024 and was marked by increased restrictions and enforcement measures affecting student and citizen protests following the tragic railway canopy collapse in Novi Sad. Police frequently used excessive force, engaged in arbitrary detentions, and remained passive when ruling party supporters attacked peaceful demonstrators. An illustrative case of formal bans is the prohibition of the Pride Caravan in Kruševac¹², where authorities cited security concerns and threats from right-wing extremist groups instead of providing necessary police protection. Another extreme obstruction occurred on 15 March in Belgrade during a mass protest of over three hundred thousand people, where unidentified individuals deployed a sonic weapon against the crowd, causing panic, stampedes, and physical injuries.¹³ This led the European Court of Human Rights to issue an interim measure demanding the Serbian government halt the use of sound devices for crowd control.¹⁴ Furthermore, the authorities obstructed protests through mass identity checks, the systematic filing of misdemeanour and criminal charges against peaceful participants, and the deployment of toxic tear gas and chloroacetophenone gas against students in Novi Sad. The evidence indicates that the authorities imposed restrictions that significantly hindered the effective exercise of the right to peaceful assembly.

According to the Belgrade Centre for Human Rights¹⁵, the commemorative gatherings (following the collapse of the railway-station in Novi Sad) and demands for accountability that developed into the largest civic mobilisation in Serbia's recent history, culminated on 15 March 2025, when around 300,000 people gathered in Belgrade, the largest protest in Serbia in two decades. Although the protests were predominantly peaceful, BCHR identified violence by third parties, attacks on demonstrators, contentious policing tactics, mass identity checks, detentions and misdemeanour proceedings, political delegitimation, and allegations of digital surveillance and misuse of forensic tools and spyware against activists and journalists. Civil society reporting documented more than 1,000 protest-related arrests since November 2024, including 47 environmental protest detentions and 48 anti-corruption arrests involving plainclothes officers operating without identification, as well as tear-gas use, verbal abuse, intimidation, physical violence by police and pro-government groups, and preferential protection of counterprotesters supporting the ruling party.

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¹¹ Serbia also remained insufficiently aligned with the third edition of the joint Venice Commission–OSCE/ODIHR Guidelines on Freedom of Peaceful Assembly, adopted in 2019 and published in its final form in 2020. The European Commission's 2024 and 2025 Serbia Reports both stress that further alignment with these standards was still required. See: UN Human Rights Committee, General Comment No. 37 (2020), CCPR/C/GC/37; Venice Commission and OSCE/ODIHR, Guidelines on Freedom of Peaceful Assembly, 3rd ed.; European Commission, Serbia Report 2024; European Commission, Serbia Report 2025.

¹² <https://dasezna.lgbt/en/police-ban-pride-caravan-in-krusevac>

¹³ <https://www.reuters.com/world/europe/mystery-sound-serbia-protest-sparks-sonic-weapon-allegations-2025-04-02/>

¹⁴ <https://www.echr.coe.int/w/interim-measure-granted-concerning-serbia>

¹⁵ https://www.bgcentar.org.rs/wp-content/uploads/2026/03/Human-Rights-in-Serbia-2025-NBS_web-1-1.pdf

In 2025, Serbia adopted a package of media-law amendments published in the Official Gazette of the RS No. 51 of 17 June 2025¹⁶, amending the Law on Electronic Media, the Law on Public Information and Media, and the Law on Public Media Services, followed by additions to the Law on Public Media Services¹⁷ published on 4 December 2025. The amendments introduced measures presented as strengthening the independence of the regulatory body and the public broadcasters (RTS and RTV), including revised appointment and accountability arrangements, budgetary autonomy guarantees, and provisions on editorial independence and pluralism.

However, NUNS reported that the preparation and adoption of the media-law amendments lacked meaningful transparency and participation and the European Commission similarly noted that the drafting process lacked transparent and inclusive consultation and did not respect the legal obligation to hold a public debate, with concerns remaining regarding the editorial autonomy and pluralism of the public broadcasters.¹⁸

Monitoring data indicate that conditions for journalists worsened over the year: NUNS recorded more than 380 attacks, threats and other forms of pressure against journalists in 2025, compared with 168 incidents recorded in the same period of 2024. Disinformation and smear campaigns also intensified, including more than 1,000 false or misleading claims about the protests recorded by Istinomer and 5,773 tabloid reports targeting protesting students and citizens.¹⁹

The 2025 amendments introduced safeguards that could, in principle, strengthen the independence of the regulator and the public broadcasters, but they were adopted without the required public consultation and their effect remains untested. Set against documented attacks on journalists and large-scale disinformation, the practical exercise of freedom of expression deteriorated relative to 2024.

SO 1.2 | Public authorities protect CSOs from interference and attacks and respect their right to privacy.

Indicator 1.2.a – Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights.

Year	Compliance
2025	2 – minimally meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

No changes were made to the legal framework governing effective remedies during 2025, and the structural weaknesses identified in earlier assessments remained. The Serbian legal system does not provide CSOs with legal remedies distinct from those available to other citizens and legal entities, and for certain decisions, such as the termination of the enrolment procedure for associations, no appropriate remedy is available.

¹⁶ Official Gazette of the RS 51/2025.

¹⁷ Official Gazette of the RS 109/2025.

¹⁸ Independent Journalists' Association of Serbia (NUNS), Indicators for the Level of Media Freedom and Journalists' Safety Index: Serbia 2024, August 2025, pp. 11–13 and 15–16.

¹⁹ Belgrade Centre for Human Rights, Human Rights in Serbia – 2025 Protests: Law, Practice and International Human Rights Standards, ed. Dušan Pokuševski (Belgrade: Belgrade Centre for Human Rights, 2026).

Remedies are frequently *post hoc* and therefore do not offer timely relief; the Administrative Court is not bound by any deadline to decide on lawsuits against decisions such as those prohibiting peaceful assembly. While a two-stage administrative review and a right of appeal exist, the hierarchy of public authorities can limit their effectiveness, and even where a ban is found unlawful there is no effective remedy to compensate for the resulting damage.

A further gap is the absence of alignment with the EU Anti-SLAPP Directive, which leaves civil society actors exposed to abusive proceedings aimed at discouraging public participation. Judicial practice in 2025 illustrates both the requirements and the limitations CSOs face when seeking review.

In *Rejting Centar Srbije v. Serbia*, the European Court of Human Rights examined a complaint by a Serbian CSO that domestic courts had wrongly refused to institute misdemeanour proceedings against a public utility company that had denied it access to information.²⁰ The Court found Article 6 § 1 inapplicable, since the proceedings sought to establish the responsibility of a state body and did not determine the organisation's civil rights and obligations or any criminal charge against it. On Article 10, the Court emphasised that a CSO seeking a remedy for denied information must demonstrate its capacity as a "public watchdog" and show that access to the specific information is instrumental to exercising its freedom of expression; because the applicant offered only a general justification ("comparative analysis"), the Court found no violation of the Convention.

In practice, access to justice declined relative to 2024, reflecting persistent systemic inefficiencies, including case backlogs, the absence of a two-instance administrative judicial system, and the lack of a mechanism for the early dismissal of abusive lawsuits, and limited accountability for the alleged use of force against activists. The absence of an effective domestic remedy for alleged police violence and the reported use of a sonic device against protesters in Belgrade²¹ led civil society organisations to seek an interim measure directly from the ECtHR, which indicated that the State should halt the use of such devices for crowd control.

The 2025 Survey findings point in the same direction. Namely, 49% of respondents reported that government authorities had taken decisions negatively affecting their organisation's ability to exercise its rights, a marked rise from 21% in 2024 (25% in 2023, 28% in 2021).

Recourse to formal remedy nonetheless remained limited: only around 20% submitted an official complaint (10% on behalf of the organisation, 3% on behalf of members, 7% both), while 80% did not. This means that 17% of organisations made official complaints when faced by these decisions, which indicates a considerable increase compared with previous years: 7% in 2024, 8% in 2023 and 10% in 2021. Among the 73 organisations explaining why they did not make an official complaint, 19% reported that they had complained before without an effective response, 11% did not know they had the right to complain, 10% feared for their safety and 4% did not know how, while the 56% selecting "other" mostly reported that no grievance had arisen. Of the 18 organisations that did complain, only two (11%) achieved a positive change, two succeeded without any change, five (28%) ended negatively and eight (44%) remained ongoing; one media organisation reported that a complaint upheld by the Press Council had no practical effect while its case before the broadcasting regulator (REM) ended negatively.

²⁰ [Rejting centar Srbije v. Serbia](#)

²¹ Belgrade Centre for Human Rights, *Human Rights in Serbia – 2025 Protests: Law, Practice and International Human Rights Standards*, ed. Dušan Pokuševski (Belgrade: Belgrade Centre for Human Rights, 2026).

Survey Results

	% CSOs saying the government took decisions that negatively impacted their ability to exercise their rights
2025	49%
2024	21%
2023	25%
2021	28%

Indicator 1.2.b – Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment, in particular:

- ➔ threats including intimidation, harassment, defamation, as well as hate speech online and of-line
- ➔ attacks including acts of violence, physical abuse, searches and damage to property
- ➔ judicial harassment including arbitrary arrest and detention, unlawful interference with communications, and abuse of criminal, civil and administrative proceedings, or threats thereof
- ➔ discriminatory treatment, including disproportionate reporting requirements for CSOs.

Year	Compliance
2025	2 – minimally meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

Serbia's legal framework still lacks adequate protection for CSOs against threats, attacks, and discrimination. The Criminal Code, Law on Public Information and Media, Law on Prohibition of Discrimination, Law on Police, and the Constitution all contain significant shortcomings. There is no specific legal regime for CSO protection, and they are treated like any other entity without special safeguards. The law does not offer specific protections against arbitrary arrest, interference with communications, or legal harassment, including SLAPP lawsuits. Proceedings involving CSOs often face delays, and even when convictions occur, protective measures for CSOs remain inadequate.

While no legislative changes were adopted in 2025 to strengthen the protection of CSOs as a sector against threats, attacks, discrimination, arbitrary interference, or legal harassment, a sector-specific development was introduced through amendments to the Law on Public Service Broadcasting.

The 2025 amendments introduced a new obligation for public media services to provide support for improving the safety and protection of journalists and media workers.²²

²² Official Gazette of RS, No. 51/2025.

The challenges that have remained include the state's failure to enact protective anti-SLAPP legislation and the lack of specific legal protection against discriminatory treatment, interference with communications and judicial harassment.

In practice, the protection of civil society actors deteriorated significantly. Compared with the 2024 report and international standards, the environment for civil society actors deteriorated, as the state failed to meet its positive obligations to protect these organisations and actively engaged in harassment.²³ An illustrative case regarding the lack of protection from administrative abuse and arbitrary actions occurred in February 2025, when police searched the offices of five prominent civil society organisations at the request of the Special Anti-Corruption Department of the Higher Public Prosecutor's Office. These searches did not result in any judicial proceedings and were widely perceived as an act of state pressure on civil society.

Furthermore, several foreign civil society representatives were expelled from Serbia and subsequently banned from entering the country.²⁴

Regarding interference with communications, the situation deteriorated as complaints were filed regarding the use of spyware targeting human rights defenders, producing a chilling effect that restricts their legitimate activities.²⁵ Furthermore, civil society organisations advocating for the rule of law faced intensified verbal attacks and smear campaigns by high-level public officials. Cases documented by the Belgrade Centre for Human Rights illustrate this²⁶: the Centre for Research, Transparency and Accountability (CRTA) was targeted after the President made inaccurate public claims about its alleged financial transactions, reportedly using information obtained following police raids²⁷; the local charity Tate Novosađani was targeted by disinformation linking it to USAID and portraying the civil society sector as an instrument for "toppling" political systems; and SNS MP Vladimir Đukanović stated that certain groups were operating "on the verge of terrorism".

The arbitrary police raids on CSOs, alongside the use of anti-money laundering mechanisms to demand financial data without criminal charges, represent state interference. Furthermore, on 21 January 2025, authorities detained 13 foreign civil society participants attending an NGO workshop organised by the Erste Academy in Belgrade, declared them a "security risk to Serbia" and banned them from entering the country for one year.²⁸ This practice of interrogating and banning foreign civic activists from entering Serbia under vague security risk designations further isolated domestic groups. Compared with the 2024 report, which primarily highlighted the hostile rhetoric and the looming threat of foreign agent legislation, in 2025, pressure extended beyond hostile rhetoric to direct administrative action. This represents a deterioration in the observance of international human rights standards in Serbia.

Physical attacks and threats affected activists at local level, including a Bravo movement activist in Kula, Dejan Zejnula of the movement Right to Life – MERI, and members of citizens' assemblies attacked by masked assailants in front of the National Assembly, while premises and civic spaces such as the Krokodil Centre, the CK13 Youth Centre and "Crni ovan" were targeted, and public events organised by ProGlas and the Feminist–Antifascist Network (FAMA) were cancelled. A reported BIA visit to the Markovac Rural Cultural Centre and a cyberattack against the Belgrade Centre for Security Policy extended this pressure into the security-service and digital domains. Overall, freedom of association

²³ European Commission, Serbia 2025 Report, Commission Staff Working Document SWD(2025) 755 final (Brussels: European Commission, 2025)

²⁴ European Commission, Serbia 2025 Report, Commission Staff Working Document SWD(2025) 755 final (Brussels: European Commission, 2025)

²⁵ <https://www.amnesty.org/en/location/europe-and-central-asia/western-central-and-south-eastern-europe/serbia/report-serbia/>

²⁶ https://www.bgcentar.org.rs/wp-content/uploads/2026/03/Human-Rights-in-Serbia-2025-NBS_web-1-1.pdf

²⁷ <https://crt.rs/predsednik-napao-crtu-teskom-neistinom-zloupotrebio-institucije/>

²⁸ <https://europeanwesternbalkans.com/2025/01/22/foreign-civic-activists-interrogated-and-banned-from-serbia-for-representing-a-security-risk/>

was curtailed less through formal legal bans and more through a climate in which critical forms of association became increasingly risky, costly and insecure.

These actions demonstrate a persistent lack of protection from discriminatory treatment and judicial harassment.

Indicator 1.2.c – Proportion of CSOs that operate effectively without threats, attacks, judicial harassment in terms of:

- ➔ number of complaints concerning lack of protection of CSOs;
- ➔ number of attacks on CSOs and their members;
- ➔ number of instances of damage to property;
- ➔ number of instances of discriminatory treatment in reporting;
- ➔ number of instances when CSO offices were unlawfully searched, or subjected to inspections;
- ➔ number of instances of interference with the communications of CSOs.

Almost half of respondents (49%) reported government decisions negatively affecting their rights (21% in 2024), and 46% reported that their organisation and/or members had been subjected to at least one of the following situations: verbal threats, physical attacks, unlawful searches, property damage or interference with communications, which is more than double the 19% recorded in 2024 and considerably higher than earlier years (28% in 2023, 30% in 2021). Verbal threats were most common (37% against the organisation, 34% against members), while physical attacks were less frequent (5% and 7%). The most widespread pressures were discrimination in accessing public funding (42%) and smear campaigns by authorities (34%), followed by funding-source restrictions and interference with communications (18% each, the latter against 7% in 2024), property damage (12%) and unlawful detainment during assemblies (12%); SLAPPs affected 9% and unlawful inspections 7% (against 1% in 2024). Respondents' accounts illustrate the severity: following the USAID shutdown, the Belgrade Higher Public Prosecutor's Office reportedly opened proceedings against five CSOs, with armed police searching offices; Zene za mir reported a December 2025 break-in at the home of its coordinator, Ljiljana Nesić;²⁹ while another local organisation was publicly branded "liars and fraudsters" in live-broadcast assembly sessions.

By contrast, in the parallel survey of public institutions 58% of officials rated CSOs' ability to operate freely as "very high" and 33% as "sufficient".

Survey Results

	% CSOs saying that their organisation or its members were subject to threats or physical attacks	% CSOs that submitted an official complaint	% CSOs saying that the authorities interfered with the communications of their CSO
2025	46%	10%	19%
2024	19%	7%	7%
2023	28%	8%	N/A
2021	30%	10%	N/A

²⁹ <https://nuns.rs/solidarna-podrska-aktivistkinji-ljiljani-nesic-i-kolektivu-zene-za-mir-iz-leskovca/>

SO 1.3 | Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression.

Indicator 1.3.a – Extent to which laws to combat extremism, terrorism, money-laundering and corruption do not unduly restrict legitimate activities of CSOs.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

The legislative and regulatory framework for combating money laundering, terrorism financing, and corruption was updated in 2025. The following relevant legal and regulatory changes were adopted in 2025:

Law on Amendments to the Law on the Prevention of Money Laundering and the Financing of Terrorism.³⁰ This law updated definitions (especially regarding digital assets and virtual currencies), increased fines for economic offences, and strengthened the protection of authorised persons reporting suspicious transactions.

Rulebook on the Methodology for Executing Tasks in Accordance with the Law on the Prevention of Money Laundering and the Financing of Terrorism adopted by the Minister of Finance.³¹ It details how obligated entities (financial institutions) assess the risks of their clients (CSOs).

Guidelines of the National Bank of Serbia (NBS) for the application of the Law on the Prevention of Money Laundering and Terrorism Financing.³² These guidelines provide specific instructions to financial institutions on how to evaluate the risk profiles of various entities, including CSOs/NPOs.

The newly introduced secondary legislation, specifically the Ministry of Finance’s Rulebook and the NBS Guidelines, increased compliance and transparency requirements affecting CSOs. Financial institutions are now required to conduct risk-based assessment of CSOs (these regulations mostly use the term non-profit organisations) based on the “Assessment of the risk of abuse of non-profit organisations for the purpose of terrorism financing”.

In practice, these requirements may create additional operational and banking obstacles for CSOs using funding mechanisms such as crowdfunding or digital assets, as well as for smaller organisations with limited capacity to meet extensive compliance and due-diligence requirements. Validation workshop participants reported growing reluctance among some banks to provide services to CSOs and instances of extensive documentation requests, including requests for identification documents of governing-board members, despite uncertainty regarding the legal basis for such requirements.

³⁰ Official Gazette of RS, No. 19/2025.

³¹ Official Gazette of RS, No. 42/2025.

³² Official Gazette of RS, No. 42/2025.

Indicator 1.3.b – Proportion of CSOs whose ability to undertake legitimate activities is not restricted by the implementation of laws to combat extremism, terrorism, money-laundering and corruption, and in particular by:

- ➔ Being judicially harassed for their alleged connections with extremism, terrorism, money-laundering and corruption
- ➔ Discriminatory restrictions placed on funding
- ➔ Authorities or banks preventing them from opening bank accounts, sending or receiving money

In 2025, formal judicial harassment on AML/CFT, extremism, terrorism or corruption grounds remained rare, but financial restrictions intensified.

Around 1% of CSOs reported judicial harassment over alleged extremism or terrorism links and 1% over alleged money laundering or corruption, broadly consistent with the 2% recorded in 2024 (none in 2023, 5% in 2021).

However, 18% reported discriminatory restrictions tied to their funding source, a sharp rise from 6% in 2024 (5% in 2023, 9% in 2021), and 11% reported being prevented from opening bank accounts or sending/receiving money, up steeply from 2% in 2024 (the same in 2023, 7% in 2021). Overall, 24% of responding CSOs reported some form of restriction.

These figures do not fully capture the broader chilling effect described by respondents, which centred on the USAID shutdown: one of them reported that in February 2025 the Belgrade Higher Public Prosecutor's Office opened pre-investigation proceedings against five CSOs, with armed police seizing USAID project documentation while tabloids and senior officials, including the President, implied funds had been embezzled, yet a year on lawyers had no case information. Another referred to the fact that the state publicly linked the sector to "money laundering and terrorism", and others reported media campaigns branding NGOs "foreign mercenaries". AML and security narratives were thus used reputationally against the sector even where formal prosecutions were few.

Survey Results

	% CSOs saying their members were subject to judicial harassment	% CSOs saying their organisation had been subjected to discriminatory restrictions	% CSOs saying they could not open a bank account or faced restrictions on sending/receiving funding
2025	2%	18%	11%
2024	2%	6%	2%
2023	0%	5%	2%
2021	5%	9%	7%

SO 1.4 | Public authorities treat all CSOs equally with regard to their operations, and equitably with other entities (such as businesses).

Indicator 1.4.a – Extent to which laws:

- ➔ Do not require CSOs to submit more reports and information than businesses.
- ➔ Do not subject CSOs to more inspections and sanctions than business entities, all else being equal.

Year	Compliance
2025	3 – moderately meets standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

Serbia’s primary laws governing CSO reporting obligations comprise the Law on Associations, Law on Accounting, Law on Auditing, Law on Public Information and Media, and Law on Tax Procedure and Tax Administration. These regulations encompass financial reporting, activity disclosure, and tax compliance, with specific requirements varying based on a CSO’s legal form and activities.

The Law on Associations, the Law on Accounting, and the Law on Auditing were not amended in 2025. The Law on Public Information and Media was amended in June 2025. Regarding the equitable treatment of different entities, a relevant amendment was introduced: the law now explicitly mandates that all public procurements of media services by public authorities must be awarded in accordance with transparent, objective, proportionate, and non-discriminatory criteria. Furthermore, these criteria and the open procedures must be published in advance on the public authority’s website. For CSOs that act as media publishers, this legally guarantees equitable treatment alongside commercial businesses when competing for state media service contracts. Additionally, the amendments strictly prohibited any actions that restrict or distort competition in the media sector.³³

The Law on Tax Procedure and Tax Administration was amended in December 2025, but the changes were technical and administrative.³⁴ Available sources do not indicate any change in the status of CSOs; they continue to be treated equally with business entities under standard tax administration procedures.

However, there are two relevant areas of regulatory updates from 2025 regarding information submission and transparency. In March 2025, a new Law on the Central Record of Beneficial Owners was enacted, replacing the previous legislation.³⁵ Under this new law, CSOs (specifically defined as associations, foundations, and endowments) and standard business entities (such as companies and cooperatives) are both classified equally as “Registered entities”. Consequently, there are no disproportionate reporting requirements; both CSOs and business entities are equally obligated to identify, record, and regularly update accurate information about their beneficial owners in the Central Record.

While statutory reporting to authorities has not become disproportionate, the 2025 AML/CFT regulations have increased the information CSOs must submit to banks and financial institutions. Under the new Guidelines issued by the National Bank of Serbia in May 2025, when banks assess the

³³ Art. 3 of the amended Law. Official Gazette RS 51/2025.

³⁴ Official Gazette RS 109/2025.

³⁵ Official Gazette RS 19/2025.

risk profile of a non-profit organisation, they are explicitly required to investigate its funding and operations. To comply and maintain access to financial services, CSOs must proactively provide banks with extensive documentation that standard business entities generally do not have to provide in the same context, including: information on their donor base, detailed sources of funding and methods of fundraising, annual work reports and financial statements, documents establishing their organisational rules, conditions for management, and the identities of those who exert control over the organisation.³⁶

No 2025 legal change introduced more inspections or harsher statutory sanctions for CSOs than for commercial businesses. CSOs remain treated as legal entities, with inspection and penalty rules generally applying equally to all legal entities.

SO 1.5 | Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grassroots organisations)

Indicator 1.5.a – Small community/local organisations and civic initiatives are allowed to operate by law without registering.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

No significant legislative change in 2025 appears to have altered the legal position of unregistered associations or informal civic initiatives. The basic framework remains the same: registration is voluntary; legal personality is acquired only upon registration; unregistered associations may exist, but they are treated under rules applicable to civic partnerships and lack the operational capacities of registered CSOs, especially regarding independent transactions and access to public funding.

Indicator 1.5.b – In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision-making processes as registered CSOs.

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	5 – fully meets standards
2021	5 – fully meets standards

Compared with 2024, there are no changes in the legal framework regarding the participation of unregistered organisations. There is no explicit legal requirement for registration as a prerequisite for participating in the decision-making process; unregistered organisations and initiatives are considered

³⁶ Official Gazette RS 41/2025, p. 33.

equal to registered ones in this aspect. Nonetheless, community organisations encounter challenges in accessing public decision-making processes. This is also observed in the 2025 CSO Survey, which shows that working-group participation of newer, smaller, non-Belgrade organisations (20%) is considerably limited compared with older, larger, Belgrade-based organisations (50%); a 2.5-fold difference that points to a structural advantage for well-resourced, centrally located CSOs in accessing formal institutional dialogue in Serbia.

The practice of imposing restrictive longevity requirements for participation in state drafting bodies continued in 2025, particularly in the field of environmental legislation. Such requirements formally excluded newer registered CSOs and informal grassroots initiatives from nominating representatives, while also discouraging broader participation by experienced civil society actors in a context of declining trust between CSOs and public authorities.

A prominent case occurred in June and August 2025, in relation to the Working Group tasked with preparing the Draft Law on Nature Protection. The public call, published by the Ministry for Human and Minority Rights and Social Dialogue in cooperation with the Ministry of Environmental Protection, required applicant CSOs to have been registered for at least five years before the call, to have statutory goals in the field of environmental protection, nature protection or biodiversity, and to demonstrate relevant project experience.³⁷ A group of civil society organisations publicly criticised the process, arguing that the selection criteria were applied inconsistently and that the choice of representatives reinforced the perception that civil society participation was being treated as a formality rather than as meaningful involvement in policymaking.³⁸

SO 1.6 | All CSOs are free to solicit and receive funding.

Indicator 1.6.a – Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions as regards

- ➔ cash and in-kind donations from all sources
- ➔ funding from domestic public bodies
- ➔ funding from institutional, corporate or individual donors
- ➔ funding from foreign governments or multilateral agencies

Year	Compliance
2025	4 – meets most standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The formal legal framework on CSO funding did not change in 2025, but the practical environment worsened because the draft Foreign Agents Law remained in parliamentary procedure and was accompanied by raids, public accusations and pressure against CSOs receiving foreign funding. The Law on Associations still allows associations to acquire property through membership fees, donations and gifts in money or in kind, subsidies and other lawful sources.

³⁷ <https://www.ekologija.gov.rs/lat/informacije-od-javnog-znacaja/konkursi/javni-poziv-organizacijama-civilnog-drustva-za-predlaganje-kandidata-za-ucestvovanje-u-radu-radne-grupe-za-izradu-nacrta-zakona-o-zastiti-prirode>

³⁸ <https://mis.org.rs/ko-radi-na-novom-zakonu-o-zastiti-prirode/>

The foreign-agents bill was still listed among laws in parliamentary procedure,³⁹ and a March 2025 attempt to add it to the agenda was not accepted. While primary laws governing the establishment of CSOs did not introduce direct bans on specific funding sources, the regulatory framework governing the receipt of funds changed in 2025 due to updated AML/CFT legislation. The 2025 NBS Guidelines explicitly categorise modern and grassroots fundraising methods, such as crowdfunding, virtual currencies, and cash donations, as high-risk indicators for terrorism financing.⁴⁰

This creates a burden on smaller, community-based CSOs that do not have access to large institutional grants or foreign government funding, which are explicitly treated as “low risk”.

Indicator 1.6.b – Proportion of CSOs that can access a broad range of funding without undue government interference.

The percentage of 2025 CSO survey respondents reporting no government interference with funding access is similar to previous years. It is 95% in 2025 with the same proportion in 2024, higher than in 2023 (91%) and 2021 (86%). 4% reported arbitrary audits or inspections (against 1% in both 2024 and 2023) and 1% freezing of accounts.

Respondents reported specific instances of interference: one organisation reported that a municipal mayor refused to sign the order opening its treasury sub-account until threatened with a lawsuit; another CSO reported being denied funding after publicly supporting the student protests; while one reported that funds intended for civil society had been redirected to government-organised NGOs.

SO 1.7 | Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner.

Indicator 1.7.a – The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The primary laws that regulate or affect public funding for CSOs remain the Law on Associations, the Law on Culture, the Law on Public Information and Media, the Law on the Budget System, the Law on Ministries, the annual Law on the Budget, and the Regulation on Funds to Encourage Programmes or Provide Missing Funds to Finance Programmes of Public Interest Implemented by Associations.

These rules are complemented each year by the annual state budget, which allocates funds to ministries and other public bodies and thereby indirectly determines the pool of resources that may be available to CSOs through public calls.

No legal changes were adopted in 2025 that would introduce a clear, predictable or comprehensive mechanism for determining the annual level of public funding available to CSOs. The 2025 Law on the

³⁹ <https://www.parlament.gov.rs/akti/zakoni-u-proceduri/zakoni-uproceduri.1037.html.10>

⁴⁰ Official Gazette RS, 41/2025.

Budget contained annual allocations under the economic classification “grants to non-governmental organisations”, including allocations within the Ministry for Human and Minority Rights and Social Dialogue, but these annual appropriations do not amount to a systematic rule on the minimum or expected level of CSO funding.

Indicator 1.7.b – Percentage of public budget actually disbursed to CSOs in a year.

The exact percentage of the public budget actually disbursed to CSOs in 2025 is not available. There is still no comprehensive official database showing the total amount actually paid to CSOs from all levels of government, including national, provincial and local budgets. Therefore, the indicator cannot be calculated with precision for 2025.

The 2025 national budget planned approximately RSD 11.6 billion, equivalent to around EUR 99 million, under economic classification 481⁴¹, “grants to non-governmental organisations”. However, this represents a planned budget appropriation rather than the amount actually disbursed during 2025.⁴²

However, the Government adopted specific annual Decrees in 2025 (see Indicator 1.7.c) that operationalised and legally defined the rules, procedures, and criteria for funding CSOs in the current year. The 2025 Government Decrees establishing annual funding programmes provide explicit, legally binding scoring rubrics for evaluating CSO projects.

Indicator 1.7.c – Extent to which legal provisions regulating the award of public funding to CSOs ensure that:

- ➔ funding criteria are clearly defined, objective and publicly announced
- ➔ evaluation of proposals is clear and impartial
- ➔ conflict of interest is clearly regulated
- ➔ reporting requirements are clear and proportionate

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

No significant legislative amendment was identified in 2025 that materially changed the legal regime for awarding public funds to CSOs under the Law on Associations or the 2018 Regulation.

The most relevant development was the adoption of the Action Plan for 2025–2026 for implementing the Strategy for Creating an Enabling Environment for the Development of Civil Society 2022–2030.⁴³ The Action Plan recognises transparent funding and sustainability of civil society as a specific objective and includes measures relating to improvement of the normative framework, administrative practice, public administration capacity for planning, allocation, monitoring and evaluation of public funds, and

⁴¹ Classification 481 is broader than funding for CSOs as defined by the Guidelines, as it also includes sports organisations, churches and religious communities, cultural organisations and other non-profit entities. It is therefore not possible to determine from this figure how much funding was specifically allocated or paid to CSOs.

⁴² Republic of Serbia, Law on the Budget of the Republic of Serbia for 2025, Official Gazette of the Republic of Serbia, No. 94/2024, Article 8 (Special Part).

⁴³ Official Gazette RS, 6/2025.

CSO capacity for transparent management of public funds. Although a positive policy development, it does not amount to a change in binding grant-award procedures, and its practical effects have yet to be demonstrated.

At the level of secondary legislation, the 2025 funding decrees do specify award procedures in some detail. The 2025 Programme for Support in Implementing the Gender Equality Policy strictly defines a 100-point evaluation criteria system. Under the same Decree, before a funding contract can be signed, the selected CSO is legally required to submit a formal “statement on the non-existence of a conflict of interest” alongside an internal act on anti-corruption policy. The 2025 Programme for Financing Projects in Underdeveloped Municipalities defines exact criteria based on project sustainability, the number of potential beneficiaries, the level of co-financing, and the effect on the quality of life. The 2025 funding decrees explicitly mandate that public calls (Javni konkurs) for awarding funds must be published on the official internet pages of the respective Ministries or Cabinets, as well as on the national e-Uprava (e-Government) portal. Under the 2025 funding decrees, the evaluation procedure is clearly regulated through the mandatory establishment of a Competition Commission (Konkursna komisija). The 2025 decrees stipulate clear and proportionate reporting mechanisms to ensure the lawful spending of public funds.

The available evidence on how these procedures are experienced diverges sharply. In the 2025 survey of public institutions, all responding institutions reported that the criteria for awarding public funding to CSOs are publicly available. The CSO survey and desk evidence point the other way: only 14% of CSOs considered public funding very or sufficiently transparent and fair, while 86% rated it poorly, and 79% of unsuccessful applicants attributed rejection to authorities funding preferred organisations.

Despite these formal safeguards, their application was weak in practice. The institutional reporting reflects the formal existence of published criteria rather than the procedural transparency CSOs experience in practice. The European Commission likewise noted that transparency and fairness need improvement, pointing to insufficiently transparent approval criteria, unclear selection of evaluation experts and weak reporting on spending⁴⁴, while domestic monitoring reports continued to document the political instrumentalisation of public calls and the funding of GONGO or “phantom” organisations.

In January 2026, BOS and BIRN published analyses of the Ministry of Environmental Protection’s 2025 public call. BOS reported that at least 17 funded organisations appeared not to meet the published eligibility or capacity requirements, including four registered after the specified cut-off date and 13 whose available financial records did not demonstrate prior experience in managing projects of the awarded value; together, these organisations received almost RSD 14 million (approximately EUR 119,000), or around 28% of the call’s RSD 50 million (approximately EUR 426,000) budget.⁴⁵

BIRN reported that almost RSD 20 million (approximately EUR 170,400) was awarded to at least nine organisations with links to governing parties and at least 19 organisations with limited or no publicly visible record of activity, including one organisation reportedly linked to the assistant minister who chaired the selection commission.⁴⁶

The 2025 analysis by Civic Initiatives, BIRN Serbia and FemPlatz on public funding for gender equality found that public financing remains non-transparent, particularly in project evaluation, and that funding was often awarded to “phantom” organisations. The analysis noted that, in the examined calls, there were no publicly available decisions appointing evaluation commissions, civil society representatives were not included in evaluation, and previous experience of applicants was often excluded or

• • • • •
⁴⁴ European Commission, Serbia 2025 Report, SWD(2025) 755 final, Brussels, 4 November 2025.

⁴⁵ Belgrade Open School, [Analiza rezultata Javnog konkursa Ministarstva zaštite životne sredine za udruženja u 2025. godini](#), January 2026

⁴⁶ BIRN Serbia. 2026. [“Iz budžeta za ekologiju: Milioni za organizacije bliske vlasti i pomoćniku ministra”](#), February 2026

minimised as a criterion. It also found that more than 80% of funds under the provincial gender equality call were awarded to “phantom” associations.⁴⁷

A 2025 Ministry of Health case further illustrated weaknesses in the implementation of award procedures. For two public calls concerning support to CSOs in health care and improved access to health care for the Roma population, evaluation and ranking lists were published on 10 April 2025, while the call documentation required the Minister to issue funding decisions within five working days after complaints were resolved; however, the decisions had still not been published by January 2026, and it remained unclear whether contracts had been concluded or more than RSD 25 million (approximately EUR 213,000) in allocated funds had been disbursed. The Coalition OKO therefore called on the Ministry of Health to publish the funding decisions, the amount awarded to each project and information on whether and when the funds had been paid, noting that some organisations had reportedly been informally encouraged to begin implementation without signed contracts or advance payments.⁴⁸

A further relevant 2025 development concerns the recommendation issued by the Commissioner for Protection of Equality to local self-government units regarding equal access of foundations and endowments to public calls.⁴⁹ The recommendation confirms a practical problem: some public calls continue to be drafted restrictively, allowing only associations registered under the Law on Associations to apply, despite the broader civil society concept recognised in the strategic framework and the legal possibility for foundations and endowments pursuing public-benefit goals to access public funding under equivalent conditions. This does not directly amend the legal framework, but it is institutionally significant because it identifies discriminatory or overly restrictive administrative practice at the local level.

Indicator 1.7.d – Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards.

Year	Compliance
2025	2 – minimally meets standards
2024	3 – moderately meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

On 1 January 2025, the Rulebook establishing the Unified Information System (JIS) for implementing and monitoring co-financing of public information projects entered into force.⁵⁰ The Ministry’s JIS portal became available to users,⁵¹ with rollout planned in two phases: authorisation of data-entry officials and registration of commission candidates from 8 January, followed in the second half of January by publication of calls and online submission of media project applications through the platform. Introduced to support transparency in media-project co-financing, the system represents a positive step.

However, direct user experience during the first application cycle revealed operational shortcomings.

⁴⁷ <https://www.gradjanske.org/analiza-javnih-sredstava-za-rodnu-ravnopravnost-netransparentno-finansiranje-i-institucionalna-ne-zainteresovanost/>

⁴⁸ Civic Initiatives / Coalition OKO (2026), <https://www.gradjanske.org/ministarstvo-zdravlja-da-hitno-objavi-rezultate-konkur-sa-iz-2025-godine/>, January 30 2026

⁴⁹ <https://ravnopravnost.gov.rs/rs/541-25-preporuka-mera-svim-jls-radi-obezbedjivanja-jednakih-uslova-za-ucesce-zaduzbina-i-fondacija-na-konkursima>

⁵⁰ <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2024/97/4/reg>; <https://mit.gov.rs/vest/sr/12711/pocin-je-sa-radom-jedinstveni-informacioni-sistem-za-sufinansiranje-medijskih-projekata.php>

⁵¹ <https://jis.mit.gov.rs/portal>

A NUNS survey of journalists and media outlets found incomplete instructions, frequently unavailable technical support, delayed registration and verification, changing documentation requirements, mismatches between published deadlines and those displayed in JIS, failures to save or display uploaded data, and instances in which users could access documents belonging to other applicants; some media ultimately abandoned applications because of unresolved technical problems.⁵²

The wider framework still rests mainly on the Law on Associations, the 2018 Regulation on financing programmes of public interest implemented by associations,⁵³ ministry websites, the E-Uprava publication requirement (a requirement that may be considered a new development), and the Ministry's Calendar of Public Calls. The Regulation requires publication of annual call plans, calls, ranking lists, award decisions and annual reports on implemented financial support, but these obligations do not yet amount to a single, standardised, machine-readable central database of individual awards. A relevant 2024 institutional development continued into 2025: the Ministry's Calendar of Public Calls application was launched in September 2024 and is intended to integrate data on planned public calls and questionnaires on funds spent, but it remains primarily a planning/monitoring tool rather than a complete public register of individual grant contracts with all identifiers.⁵⁴ The Open Data Portal contains earlier datasets on planned public calls, including a 2019 API dataset, but this is not a comprehensive current awards database.⁵⁵

Institutional and CSO assessments of how far this translates into practice diverge. In the 2025 survey of public institutions, 33% of responding officials considered that award information was made "fully public" and 50% "sufficiently public", while 83% said it was positive overall, with 17% rating it "insufficiently public" and none "not at all public", continuing the favourable institutional self-assessment recorded in 2024. This should be read against the 2024 finding that the level of detail published on individual awards varies considerably between institutions, and against the CSO experience of opaque allocation: the institutional view reflects that award information is formally published rather than that it is consistently complete.

The European Civic Forum's Civic Space Report 2025 – Western Balkans notes persistent concerns about the lack of transparency and accountability in the distribution of public funds in Serbia, including politically aligned or phantom organisations benefiting from such funding and allocations disproportionately favouring a limited number of organisations lacking transparency, expertise or public visibility.⁵⁶

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⁵² Independent Journalists' Association of Serbia (NUNS), <https://nuns.rs/kako-neradi-jedinstveni-informacioni-sistem/>, 14 March 2025

⁵³ <https://www.paragraf.rs/propisi/uredba-sredstvima-podsticanje-programa-nedostajuceg-dela-sredstava-finansiranje.html>

⁵⁴ <https://kalendarkonkursamini.mpdd.gov.rs/>; <https://www.srbija.gov.rs/vest/813892/aplikacija-kalendar-javnih-konkursaa-za-organizacije-civilnog-drustva.php>

⁵⁵ <https://data.gov.rs/sr/datasets/kalendar-planiranih-javnih-konkursaa-organa-javne-uprave-za-organizatsije-tsivilnog-drustva-u-2019-godini/>

⁵⁶ European Civic Forum, Civic Space Report 2025 – Western Balkans, June 2025

Indicator 1.7.e – Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair and non-discriminatory.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

Survey Results

	% CSOs saying public funding is transparent and fair
2025	14%
2024	5%
2023	5%
2021	10%

CSO perceptions of domestic public funding remained overwhelmingly negative in 2025. On a combined transparency-and-fairness scale, only 3% of respondents rated provision “very transparent and fair” and 11% “sufficiently”, 14% positive in total, while 38% rated it “insufficiently” and 48% “not at all”, meaning 86% judged it poor. This is consistent with the persistently low ratings of prior assessments, when only 5% considered public funding transparent and fair in both 2024 and 2023 (10% in 2021).

Award outcomes reflected the same pattern: 36% of organisations were awarded public funding in 2025, while 31% applied unsuccessfully and 33% did not apply at all. The stated reasons point to perceived favouritism rather than merit: among those whose applications failed, 79% attributed the outcome to authorities funding their preferred organisations, and none cited weak proposals, strong competition or complicated procedures. Among non-applicants, 30% saw no realistic chance of success and 25% did not wish to receive public money. Respondents’ accounts reinforced this: some alleged that funds are channelled to preferred organisations and diverted to party-related activities, while others described competitions cancelled after launch or with results never published.

The parallel survey of public institutions presented the opposite picture. Of the institutions that answered, 83% rated their own procedures very or sufficiently transparent (50% “very”, 33% “sufficiently”) and only 8% “insufficiently”. At municipal level, all local authorities that answered assessed their procedures positively: half as “very transparent” and half as “sufficiently transparent”. Responses from the remaining central and regional institutions were more mixed; far fewer rated fairness, and those that did were divided (one each “very fair”, “sufficiently fair” and “insufficiently fair”), so the fairness dimension cannot be read reliably from this small sample. This strong institutional self-rating appears to reflect formal procedural compliance rather than the discriminatory practice that CSOs and independent monitors describe.

Survey Results

	% CSOs that did not apply for public funding	% CSOs applied for public funding and were not successful	% CSOs applied for funds and were successful
2025	33%	31%	36%

In 2025, the strongest signal of exclusion was that 79% of organisations whose applications were rejected attributed this to authorities funding their preferred organisations, with respondents describing funds redirected to government-organised NGOs and refusals linked to their public positions.

In the parallel survey of public institutions, officials judged their funding uniformly inclusive: 36% rated the award of public funding they were responsible for “very inclusive” and 64% “sufficiently inclusive”, with none selecting “insufficiently” or “not at all inclusive”.

To explain how institutions channel support, the public institutions survey asked which funding forms they used in 2025. The dominant mechanism of funding was open calls for grant proposals (75%), followed by purchasing services or goods (42%) and in-kind contributions (25%); one institution used ad hoc demand-based donations and none reported direct grants, while two (17%) provided no funding to CSOs at all. Competitive grant calls thus remain the principal route through which Serbian public institutions fund civil society, precisely the channel where CSO and institutional assessments of fairness diverge most sharply.

Indicator 1.7.f – Public funding does not exclude CSOs on the basis of constituency representation

In the 2025 CSO survey, none of the respondents indicated that their organisation’s application for public funding was rejected because authorities did not want to fund work with the people they serve and represent. This marks a change compared with previous assessments, when 12% of CSOs reported this reason in 2024, 14% in 2023, and 5% in 2021. However, this does not necessarily indicate improved fairness in public funding, as respondents in 2025 (79%) more frequently pointed to other forms of perceived favouritism, especially the view that authorities fund preferred organisations as detailed above under 1.7.e. This may explain why 37% of 2025 CSO survey respondents working in the rule of law or 40% of those working on environment and climate areas did not apply for public funding.

SO 1.8 | Individuals and corporations enjoy tax benefits for their donations to CSOs.

Indicator 1.8.a – Tax legislation allows for tax relief as regards:

- ➔ Individual giving
- ➔ Corporate giving

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

The circumstances surrounding individual and corporate giving remained unchanged from the baseline report. No material change was identified in 2025 that altered the tax-relief regime for donations to CSOs. The simplified methodological approach is therefore appropriate.

There were amendments to certain Serbian tax laws during the reporting period, including amendments to the Law on Personal Income Tax and the Law on VAT. However, these amendments did not introduce a general personal income tax deduction or credit for individual donations to CSOs, nor did they materially change the corporate tax deduction for donations under the Law on Corporate Income Tax. The main structure identified in the previous reporting period therefore remained unchanged: corporate giving enjoys limited tax recognition, while individual giving is not supported through a general tax incentive.

Indicator 1.8.b – Proportion of private individuals who have given money to a CSO.

Data provided from CAF World Giving Index Report.

Year	% of private individuals who donated to a CSO
2025	36%
2024	43%
2023	41%
2021	60%

In 2025, 36% of the population in Serbia reported donating to charity, according to the CAF World Giving Report.⁵⁷ This was lower than the 43% reported in the 2024 assessment, although the figures should be compared cautiously because the CAF category “donated to charity” is not necessarily identical to the indicator wording “gave money to a CSO”.

⁵⁷ Charities Aid Foundation, World Giving Report, Serbia country data: 36% of the population donated to charity.

SO 1.9 | Tax benefits are available to CSOs.

Indicator 1.9.a – Extent to which applicable tax laws provide for the following:

CSO income generated from grants, donations, and membership dues, income from economic activities, investment income, real property, gifts and inheritance is not subject to taxation;

Any excess revenue or profit generated through economic activity and used for mission-related purposes by CSOs is not subject to corporate income/profit tax.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

As in 2024, the Serbian tax framework provides partial tax benefits to civil society organisations, but these benefits are neither comprehensive nor fully aligned with the objective of financial sustainability. The applicable regime is based primarily on the Law on Corporate Income Tax, the Law on Property Taxes, and the Law on Value Added Tax. In 2025 there were tax-law amendments relevant to VAT and property-tax administration, but no substantive change to the core CSO corporate-income-tax exemption or the RSD 400,000 threshold under Article 44.⁵⁸ The VAT Law was amended in 2025, but the amendments were primarily technical and procedural, concerning issues such as internal invoices, correction of VAT base, input VAT and electronic-fiscal documentation. They did not introduce a general VAT exemption for CSOs.

SO 1.10 | The policies and legal environment provide incentives and facilitate volunteering for and employment in CSOs.

Indicator 1.10.a – Laws regulating volunteering are adopted.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

No substantive legislative change was identified in 2025. The Law on Volunteering from 2010 remained in force, and no new Law on Volunteering was adopted.⁵⁹ The law does not provide a sufficiently enabling framework for volunteering in CSOs. Its regulatory model is overly administrative and insufficiently flexible. It does not adequately distinguish between genuine civic volunteering and unpaid

⁵⁸ https://www.paragraf.rs/propisi/zakon_o_porezu_na_dobit_pravnih_lica.html

⁵⁹ https://www.paragraf.rs/propisi/zakon_o_volontiranju.html

labour-like arrangements. It also imposes obligations and potential sanctions that may be disproportionate for small civil society organisations. As a result, the law is more protective and controlling than enabling. No evidence was identified that a new draft entered parliamentary procedure during the reporting period.

Indicator 1.10.b – Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	2 – minimally meets standards

Throughout 2025, no progress was made towards adopting a National Volunteering Strategy in Serbia. While volunteering remains recognised as important in existing strategic documents adopted in the previous period (Strategy for Creating an Enabling Environment for Civil Society 2022–2030, and Strategy for Youth in the Republic of Serbia for the Period 2023–2030), there have been no significant advances in terms of new government-led programmes or policies, nor funding mechanisms to systematically support volunteering.

Indicator 1.10.c – Proportion of CSOs that benefit from state employment strategies and programmes.

According to the 2025 survey, 6% of CSOs reported benefiting from government employment programmes, a continued decline from 9% in 2024, 12% in 2023 and 25% in 2021, while 87% did not benefit and 8% said no such programme exists.

As in previous years, beneficiaries drew on standard active-labour-market instruments of the National Employment Service (NES) rather than any civil-society-specific scheme.

One CSO hired one employee through the “My First Salary” programme; while two others used subsidies for employing unemployed persons; others used NES traineeship and internship schemes; and one organisation engaged three persons with disabilities through public works co-financed by the NES and the City Administration. The data confirm that state employment programmes play only a marginal role in supporting the sector.

Survey Results

	% CSOs saying they benefit from state employment strategies and programmes
2025	6%
2024	9%
2023	12%
2021	25%

Indicator 1.10.d – Proportion of CSOs that benefit from state volunteering strategies and programmes.

The only input in the 2024 Assessment Report was that there were no state volunteering strategies and programmes in place. The 2025 survey nonetheless asked organisations whether they had benefited from government volunteering programmes: 15% answered yes, 74% no, and 11% that no such programme exists.

However, the qualitative analysis of these responses indicates that most of the 15% who answered yes described mobilising volunteers from their own networks under the general legal framework rather than benefiting from state volunteering strategies. One organisation stated explicitly that “this is not any kind of programme” but volunteer engagement carried out under the Law on Volunteering and reported to the Ministry of Labour; another pointed to its own city-level volunteer service in Novi Sad; and a third ran an international volunteer camp. The picture is of vibrant but largely self-organised volunteering rather than activity enabled by structured government strategies or programmes. Survey responses from specialised CSOs further confirm this interpretation, as key CSOs assessed access to government volunteering programmes as either limited or unavailable, with none considering them widely accessible.

Indicator 1.10.e – Proportion of employees in CSOs in relation to the total workforce.

According to the Labour Force Survey, the total active workforce in 2025 was 3,141,900, comprising 2,869,500 employed and 272,400 unemployed persons.⁶⁰ The total number of registered employed persons in 2025 amounted to 2,364,301, a decrease of 0.2% compared with the previous year. Of these, 13,582 were registered as employed in CA2010/NACE Rev.2 division 94 – Activities of membership organisations.⁶¹ This represented 0.57% of total registered employment and 0.43% of the total active workforce. Compared with 2024, when 13,663 persons were registered in this activity, the number decreased slightly, while the sector’s share in overall employment remained broadly unchanged.

Indicator 1.10.f – Percentage of people who have volunteered to give their time to an organisation.

According to the CAF World Giving Report, 15% of the population in Serbia undertook unpaid voluntary work in 2025, compared with 13% in 2024. This represents a modest increase in reported volunteering, although the CAF measure covers unpaid voluntary work benefiting people beyond the respondent’s family or friends and is therefore somewhat broader than volunteering specifically through an organisation.

	% population who have volunteered their time to an organisation
2025	15%
2024	13%
2023	6%
2021	7%

⁶⁰ Labour Force Survey, 2025 – Statistical Office of the Republic of Serbia Link: <https://www.stat.gov.rs/en-us/vesti/statisticalrelease/?p=18182>

⁶¹ Registered employment, 2025 – Statistical Office of the Republic of Serbia Link: <https://stat.gov.rs/en-us/vesti/statisticalrelease/?p=17757>

Specific Objective 2: Strengthened cooperation and partnership between CSOs and public institutions.

SO 2.1 | Public authorities and institutions include CSOs in decision and policy-making processes.

Indicator 2.1.a – Laws, by-laws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs in that:

- ➔ CSOs have access to the draft document from the beginning of the drafting process to the end of the adoption procedure;
- ➔ At least 15 days are allowed for commenting before the draft document enters the adoption procedure;
- ➔ The use of extraordinary/expedited procedures to adopt legislation without allowing for consultation is an exception and duly justified;
- ➔ Reports on results of public consultations, including reasons for rejection of comments, are published in a timely fashion;
- ➔ Working groups members from CSOs are selected based on a public call, clear criteria and in line with equal treatment;
- ➔ Working group members from CSOs include representatives of society as a whole, including women's groups, LGBTIQ groups, migrant groups, minorities, disability groups, and others as appropriate, in line with the Human Rights Based Approach.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

The normative framework governing public participation, primarily the Law on the Planning System, the Law on Public Administration, and the Government Rules of Procedure, formally establishes mechanisms for CSO involvement, but 2025 amendments reveal concerning loopholes.

The 2025 Decree on Public Policy Management Methodology and Decree on Regulatory Impact Assessment⁶² and the updated Government Rules of Procedure⁶³ mandate that consultations and public hearings be conducted via the official eKonsultacije portal. Public hearings must be initiated through a public call and last at least 20 days. Authorities are legally required to publish a report on the conducted consultations within 15 days of their conclusion, explaining which suggestions were accepted or rejected. CSOs can be included in working groups for drafting laws and policies based on public calls.

A critical 2025 amendment to the Government's Rules of Procedure (Article 41a) introduced a mechanism allowing the Government to entirely bypass the mandatory public hearing phase if it unilaterally

⁶² Official Gazette RS, 20/2025.

⁶³ Official Gazette RS, 106/2025.

determines that prior consultations successfully resolved all open issues. “The Government may, at the proposal of the authorised proposer and based on the report on the conducted consultations, adopt a conclusion stating that it is not necessary to conduct a public debate regarding a draft law or public policy document because open issues were agreed upon during the consultations, i.e. if the text was harmonised with the comments and suggestions made by the interested public during the consultations”.

Institutional records, such as the 2025 Ombudsman’s Report, confirm that public consultations remain largely formal rather than substantive. Ministries frequently violate statutory procedures by failing to submit draft laws for mandatory opinions or impact assessments prior to adoption. This results in a superficial participatory process where CSO inputs are routinely ignored, and laws are fast-tracked without genuine societal consensus.⁶⁴

While the legal architecture provides the necessary tools for CSO inclusion (e.g., the eKonsultacije⁶⁵ portal and formal working groups), the practical execution heavily undermines these guarantees. The introduction of discretionary powers allowing the Government to skip public hearings, coupled with the systemic failure of state organs to conduct proper socio-economic impact assessments before adopting regulations, demonstrates a lack of political will to genuinely integrate CSO expertise.

In 2025, 47 laws were adopted under the urgent procedure, compared with 191 under the regular procedure, meaning that urgent procedures accounted for approximately 19.7% of all laws adopted during the year.⁶⁶ In practice, however, consultation standards are not applied consistently. The June 2025 amendments to media legislation are particularly illustrative: the drafting process was assessed as lacking transparent and inclusive consultations and, except for the Law on Public Broadcasters, did not respect the legal obligation to hold a public debate.

The legislative framework for involving working group members from CSOs based on a public call, clear criteria and in line with equal treatment has not changed in 2025.⁶⁷ Relevant laws do not contain provisions that would ensure that members of working groups from civil society have diverse backgrounds (women’s groups, LGBTIQ+ groups, migrant groups, minorities, disability groups, and others when appropriate) and nothing has changed in this regard in 2025.

The deterioration in meaningful participation was also reflected in the coordinated withdrawal of civil society from formal cooperation mechanisms. On 4 February 2025, twenty-eight leading Serbian CSOs suspended cooperation with the legislative and executive authorities and withdrew from working groups and advisory bodies.⁶⁸ The National Convention on the European Union likewise suspended cooperation with political decision-makers in processes requiring collaboration with public authorities⁶⁹, while media associations suspended participation in government working groups and in the Permanent Working Group for the Safety of Journalists.⁷⁰ These decisions demonstrated that formal opportunities for participation were increasingly considered ineffective in the absence of genuine institutional responsiveness.

Survey findings show consultation concentrated at executive and local level and rarely meeting basic quality standards. Only 24% of CSOs reported access to draft documents from the start of

64 Official Gazette RS, 24/2025.

65 <https://ekonsultacije.gov.rs/>

66 Open Parliament initiative, data for 2025: <https://otvoreniparlament.rs/statistika/zakoni-po-hitnom-postupku>,

67 Government has issued a decision establishing Guidelines for the Inclusion of Civil Society Organisations (CSOs) in the legislative process in 2014. Additionally, further guidance on best practices for implementing these Guidelines are provided in the document “Opis dobre prakse za sprovođenje Smernica” and in the “Zaključak o usvajanju Smernica za uključivanje u OCD u radne grupe 2020”.

68 <https://www.gradjanske.org/odluka-o-obustavi-saradnje-sa-zakonodavnom-i-izvrsnom-vlascu-u-srbiji/>

69 National Convention on the European Union, Book of Recommendations 2025 <https://eukonvent.org/wp-content/uploads/2025/11/Book-of-Recommendations-2025.pdf>, <https://savremenapolitika.com/nacionalni-konvent-nece-ucestvovati-u-aktivnostima-u-okviru-procesa-evropskih-integracija/>

70 [OSCE Mission to Serbia, Report on the Work of the Permanent Working Group for the Safety of Journalists in 2025](#)

government-level drafting to the end of adoption, and 20% at municipal level, with lower figures for civil society cooperation strategies (13%), EU accession programming (7%) and parliament-level drafting (6%). Access and timing improved modestly against 2024 but remained limited: full-process access to drafts stood at 24% (12% in 2024, 25% in 2021) and 30% were given at least 15 days to comment (12% in 2024, 20% in 2021).

With regard to the CSO survey, the question used to assess CSOs' involvement in effective consultation processes was revised this year to provide a more nuanced and detailed picture. In previous years, CSOs were asked whether they had been included in an effective consultation process, with "effective" defined as having access to draft documents from the beginning of the process and having at least 15 days to provide feedback. This year, the two criteria were split into separate questions, asking respondents independently whether they had access to drafts and whether they had at least 15 days to respond and whether both conditions were met within the same consultation process.

This methodological change reveals a striking gap between participation and quality: while 64% of responding CSOs reported being involved in at least one consultation process either with full access to draft documents or 15 days to respond, this figure drops sharply to just 9% when the consultation process met both criteria simultaneously; indicating that meaningful, effective consultation remains the exception rather than the rule. This confirms that, while consultation opportunities exist, fully effective consultation remains rare in practice. Overall, 19% of the consultations in which CSOs reported involvement met both criteria for effective participation. These effective consultations were mostly at government level (39%), followed by municipal level (22%), civil society strategy consultations (17%), and parliamentary-level and EU accession consultations (11% each).

Working-group membership was low: 63% reported none, while 20% sat on a government working group (18% in 2024), 16% on a municipal one and 5% on a parliamentary one. Respondents underlined the gap between form and substance: organisations engaged in strategy and action-plan working groups reported that the process was not transparent or inclusive from beginning to end, and a media-freedom coalition reported suspending cooperation with state institutions over the treatment of journalists.

A deeper analysis of the 2025 CSO Survey sheds light on the less visible barriers some CSOs face in taking part as members of working groups. CSOs working on gender equality, LGBTIQ+ rights and minority rights, while engaging in open consultations at rates of 82-89%, were represented at considerably lower rates in working groups. Gender equality and LGBTIQ+ organisations participate in working groups at only 23%, and minority rights organisations at 23%, both below the average participation rate of 31%. With due attention to the fact that the survey is not representative, this underrepresentation emerging from the survey deserves further analysis and monitoring.

Public institutions assessed their own practice more favourably: 75% described 2025 consultation with CSOs as very or sufficiently effective and 75% said CSO views were reflected in the final product, though 33% considered the mechanisms only insufficiently meaningful and 33% felt the public was insufficiently informed of opportunities to contribute. The most-used mechanisms were informal consultations (67%) and working groups including CSOs (58%), followed by public consultations (42%); no institution used public hearings.

Cited successes in the survey responses included the cooperative drafting of the new Consumer Protection Law and the Ombudsman's June 2025 Council for the Rights of Persons with Disabilities.

This reliance on informal consultation is itself a weakness against the standard of structured, timely and documented engagement, and the institutional optimism contrasts with the low CSO figures on draft access (24%) and the 15-day minimum (30%). The key CSO survey further supports this assessment, as all respondents considered consultations in policy and decision-making processes not meaningful.

Overall, the framework offers adequate consultation mechanisms, but the 2025 introduction of discretion to bypass public hearings, weak impact-assessment practice and the largely formal character of participation indicate continued minimal compliance.

Survey Results

	% CSOs saying they were effectively consulted by authorities
2025	64% (9% when both effectiveness conditions are met)
2024	24%
2023	29%
2021	18%

Indicator 2.1.b – CSOs are effectively included in oversight mechanisms.

This indicator was not assessed.

Indicator 2.1.c – Proportion of CSOs that have participated in consultations during preparation of state reports under international human rights and other legal obligations, and the implementation of treaty body recommendations.

This indicator was not assessed.

SO 2.2 | Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes.

Indicator 2.2.a – Extent to which CSOs assess the attitude of public officials towards civil society as supportive.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In the 2025 survey, only 8% of the respondents rated the overall attitude of public institutions towards civil society as supportive (1% 'very supportive', 7% 'mostly supportive'), lower than the 11% recorded in 2024, higher than the 6% in 2023 and much lower than the 14% in the baseline year (2021). A further 16% described the attitude as neutral, while roughly three quarters perceived hostility: 45% rated it 'mostly negative' and 30% 'hostile'. This is consistent with the 82% who perceived officials as not at all or insufficiently supportive in 2024.

It is important to note that comparisons with previous years should be interpreted carefully, as the indicator measured attitudes of public institutions towards CSOs in 2025, whereas earlier assessments focused on public officials' attitudes. In addition, in previous years the 'neutral' option was not offered

to respondents, and its addition in the 2025 survey decreased the share of CSOs describing the approach of public officials as not supportive.

Respondents' accounts reinforce disengagement at local level, some of them describing the local self-government as 'completely closed to cooperation with the civil sector', while others reported that schools, youth offices and kindergartens had cancelled or refused cooperation. A supportive official attitude was the exception rather than the norm in 2025. This claim is further supported by the key CSO survey respondents who viewed the attitude of public officials towards CSOs as hostile.

In the parallel survey of public institutions, the assessment was the inverse: all institutions that answered rated public officials supportive towards CSOs (33% "very supportive", 67% "sufficiently supportive"), and 92% regarded the role of CSOs in policy-making as important (50% "very", 42% "sufficiently"). This reproduces the perception gap documented in 2024 (11% of CSOs supportive versus a majority of institutions positive) and reflects an institutional self-assessment sharply at odds with the CSO experience and desk evidence.

Survey Results

	% CSOs that assess the attitude of public institutions as supportive	% CSOs that assess the attitude of public institutions as not supportive
2025	8%	75% (+16% neutral)
2024	11%	82%
2023	6%	82%
2021	14%	81%

SO 2.3 | Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms.

Indicator 2.3.a – Proportion of CSOs that were effectively consulted in the preparation of civil society cooperation strategies.

In 2024, the Assessment noted that consultations on the Strategy for Creating an Enabling Environment for the Development of Civil Society (2022–2030) had taken place in 2021, with no fresh consultation thereafter. The 2025 survey measured ongoing involvement in the preparation of civil society cooperation strategies and found it among the weakest of all participation processes: only 17% of the respondents reported any involvement, while 83% recorded "not applicable". Where involvement occurred, it was largely shallow: only 13% had access to draft documents from beginning to end and 8% (7) were given at least 15 days to comment. Of the 15 CSOs reporting involvement in consultations related to the civil society strategy, only three stated that the process met both effectiveness criteria. Consultation on cooperation strategies was thus narrow in reach and shallow in quality.

On the other hand, awareness among public institutions of any strategy process was very low: only one reported that a process to develop a new cooperation strategy was implemented in 2025, two said there was none, and eight (73%) did not know; asked how effectively CSOs were engaged in developing and implementing the cooperation strategy, nine of eleven (82%) again answered "I don't know". This absence of institutional knowledge is itself notable and is consistent with the low CSO involvement figure (17%).

Indicator 2.3.b – IPA beneficiaries have adopted currently valid civil society cooperation strategies.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	1 – does not meet standards

Serbia has an adopted and currently valid civil society cooperation strategy: the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2022–2030. The document was formally adopted by the Government and remained in force throughout 2025. Therefore, the formal requirement under this sub-indicator is fulfilled. There were no relevant changes in 2025 concerning the existence or validity of the strategic document itself.

Indicator 2.3.c – Civil society cooperation strategies are accompanied by adopted budgeted action plans.

Year	Compliance
2025	4 – meets most standards
2024	1 – does not meet standards
2023	5 – fully meets standards
2021	1 – does not meet standards

The umbrella Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2022–2030 is accompanied by a valid Action Plan for the 2025–2026 period, adopted by the Government in January 2025.⁷¹ The total financial resources required for the implementation of this Action Plan are estimated at RSD 250,600,000 (EUR 2,135,312), of which RSD 125,300,000 (EUR 1,067,656) is explicitly allocated in the 2025 budget. However, cross-referencing the documentary findings reveals that the chronic problems with financing public policies in Serbia persist. The state continues to rely heavily on international donors to fund the actual programmatic activities. Consequently, instead of establishing robust, dedicated operational funds for CSO development, the state portrays the regular salaries of its administration as “budgeted” strategy execution, highlighting a chronic stagnation in substantive domestic budgeting. The Action Plan does not specify the value of anticipated donor contributions. However, donor funding is listed as a source for 46 activities: 34 rely exclusively on donor funds, while 12 combine donor support with existing state-budget resources.

⁷¹ Official Gazette RS, 6/2025.

Indicator 2.3.d – Proportion of CSOs that rate civil society cooperation strategies as relevant and effective.

In the 2025 survey, assessments of the national civil society cooperation strategy revealed a split between relevance and effectiveness. While only 2% of responding CSOs assessed the Strategy as both relevant and effective, 27% rated it as relevant against 31% not relevant; and only 5% found it effective, compared with 65% not effective.

The 2024 Assessment recorded comparable figures: 21% found the strategy relevant and 8% effective, with 9% considering it both relevant and effective. The persistent finding is that a minority still regard the strategy as relevant in principle while almost none consider it effective in practice.

% CSOs saying the civil society cooperation strategy is relevant and effective	
2025	2%
2024	9%

Indicator 2.3.e – Public structures responsible for the implementation of civil society cooperation strategies are appropriately resourced.

The primary state body tasked with coordinating the umbrella Strategy for Creating an Enabling Environment for the Development of Civil Society 2022–2030 is the Ministry of Human and Minority Rights and Social Dialogue (MLJMPDD, its Serbian abbreviation).

Based on the 2025 official budget and institutional reports, this body does not possess adequate or stable financial resources to fully execute its mandate. The 2025 Budget Law nominally allocates funds to the MLJMPDD under Programme 1002 (“Creating an enabling environment for civil society development”), but the operational amounts are exceptionally modest (e.g. RSD 480,000 / EUR 4,090 designated for contracted services in 2025).⁷² Furthermore, official evaluative reports explicitly acknowledge that a number of strategic activities were not realised due to “insufficiently directed resources of the line ministries for their implementation”. The European Commission’s 2025 Rule of Law Report found that the impact of the Strategy and the Action Plan had yet to be demonstrated.⁷³ It also noted that CSOs froze their membership in the Council for Creating an Enabling Environment for the Development of Civil Society in January 2025⁷⁴ due to the Council’s lack of institutional reaction to increasing attacks on civil society organisations. This indicates that the institutional structures existed, but their authority, responsiveness and practical capacity to support civil society cooperation were limited.

In the 2025 survey of public institutions, officials most commonly identified the Ministry of Human and Minority Rights and Social Dialogue as the structure responsible for implementing the civil society strategy at national level, with local respondents pointing to their own municipal administration; one municipality noted that it has no such strategy. On resourcing, among the institutions that answered, none considered the responsible body ‘very adequately’ resourced and only one ‘sufficiently adequately’, while three rated its human and financial resources ‘insufficiently adequate’ and seven (64%) did not know.

Among those venturing a view the balance tilted negative, corroborating the 2024 Assessment’s detailed finding that the responsible Department operated with only five of ten posts filled, a minimal

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⁷² Ibid.

⁷³ European Commission, 2025 Rule of Law Report: Country Chapter on the rule of law situation in Serbia, SWD (2025) 923 final, Brussels, 2025.

⁷⁴ Ibid.

co-financing budget and heavy reliance on external donors such as the USAID- and Swiss-funded “Civil Society Resilience Activity” project, support whose sustainability became uncertain after the 2025 USAID withdrawal.

Indicator 2.3.f – Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs in that:

- ➔ they have an agreed programme of work
- ➔ they have agreed rules of procedure
- ➔ they meet regularly
- ➔ rules allow CSOs to call the meetings and contribute to agenda setting
- ➔ there is adequate follow-up to conclusions and recommendations

Year	Compliance
2025	2 – minimally meets standards
2024	3 – moderately meets standards
2023	4 – meets most standards
2021	1 – does not meet standards

Serbia has a formally established Council for Creating an Enabling Environment for the Development of Civil Society as a government advisory body and structured mechanism for dialogue between public authorities and CSOs. The formal architecture contains the main procedural elements required for dialogue: a work programme, rules of procedure, published agendas/session information, CSO representation, and an initiative form through which matters may be submitted to the Council.⁷⁵ However, the mechanism did not function meaningfully in 2025. The official session page lists six Council sessions, ending with the sixth session of 17 December 2024, when the 2025 Work Plan was adopted.⁷⁶ No subsequent 2025 session record was identified on the official Council session page.

In January 2025, CSO members of the Council publicly announced that they would freeze their participation and not attend Council sessions for the foreseeable future, citing the lack of institutional reaction to attacks and pressure against civil society.⁷⁷ The European Commission’s 2025 Serbia Report also records that CSOs froze their membership in the Council in January 2025 due to the Council’s lack of institutional reaction to increasing attacks on human rights defenders, and notes that cooperation between government and CSOs was under strain.⁷⁸

The Ministry of Human and Minority Rights and Social Dialogue was reported to be conducting bilateral meetings in an attempt to restore dialogue and was considering dissolving and reconstituting the Council if the boycott continued.⁷⁹

⁷⁵ <https://minijmpdd.gov.rs/sektori/civilno-drustvo/savet-za-stvaranje-podsticajnog-okruzenja-za-razvoj-civilnog-drustva/savet/>

⁷⁶ Ibid.

⁷⁷ <https://centaronline.org/en/members-of-the-council-for-creating-a-supportive-environment-for-civil-society-development-freeze-their-membership-due-to-threats-to-csos-work/>

⁷⁸ https://enlargement.ec.europa.eu/document/download/6e68ce26-b95b-48e1-921a-c60c12da8f00_en?filename=serbia-report-2025.pdf

⁷⁹ Hajde4EU Field Mission Meeting with the Ministry of Human and Minority Rights and Social Dialogue, Belgrade, 24 February 2026.

Specific Objective 3: CSOs' capacities and resilience to carry out their activities are reinforced.

SO 3.1 | CSOs' internal governance structures follow the principles of good governance.

Indicator 3.1.a – Proportion of CSOs that have an independent and effective governing body, with clear terms of reference to oversee the organisation's strategic goals, impact, management, legal compliance, and accountability.

Year	Compliance
2025	4 – meets most standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

This indicator was assessed differently in 2025. In previous years, the relevant question in the CSO surveys required that the effective governing body is appointed by the assembly, which is a rather narrow and limited interpretation of an effective governing body, not only because it leaves out unregistered or small organisations but also because organisations may have different means and methods of their own to select/appoint/decide their governing bodies. Therefore, in 2025, the question was formulated differently and inquired about the existence of a governing body (e.g. assembly, board or council responsible for oversight, legal compliance and accountability).

Consequently, the percentage of CSOs that responded positively to this question was considerably higher than in previous years, with 96% of the respondents reporting having a governing body (90% in 2024, 92% in 2023, 91% in 2021) and 99% a formal governing document (97% in 2024, 99% in 2023 and 2021).

The percentage of CSOs having both a governing body and a governing document was 79%. On the evidence available, and given the re-interpretation of the question in 2025, the compliance score is raised to 4 – meets most standards.

Survey Results

	% CSOs saying they have an independent and effective governing body
2025	79%
2024	49%
2023	53%
2021	58%

Indicator 3.1.b – Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body.

Year	Compliance
2025	2 – minimally meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

This indicator was assessed differently in 2025. In previous years, the relevant question in the CSO surveys asked how often governing body members were signing a conflict-of-interest declaration, which is a rather narrow interpretation of the indicator standard, not only because it would leave out unregistered CSOs, but also because organisations may have different ways and means for assessing conflict of interest. Therefore, in 2025, the survey question asked how often organisations check for potential conflicts of interest in general. On this basis, the 2025 survey shows an improvement in regular conflict-of-interest screening, with 48% of respondents stating that they check conflicts of interest every year (47%) or every two years (1%).

However, significant gaps still exist, with 26% checking only once upon entry into the role (50% in 2024, 40% in 2023, 33% in 2021), and 14% never carrying out such checks (a continued fall from 20% in 2024, 32% in 2023 and 36% in 2021), while 13% described other arrangements. These included conducting checks only when required for specific projects, regulating the issue through the organisation's statute, applying checks continuously or only rarely, and relying on informal knowledge within small organisations where members know one another well.

Based on the respective change in interpreting the applicability of this indicator, the compliance score is now raised to 2.

Indicator 3.1.c – Proportion of CSOs that share relevant information on their organisation, using the means and channels that are accessible to all stakeholders in terms of publishing.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In the 2025 survey, website publication of governance information was broadly stable against 2024. Of the total respondents, 33% published their governing document (statute) on the organisation's website (31% in 2024), 31% published their governing structure (29% in 2024) and 33% the names of governing-body members (34% in 2024). Only 18% of CSOs reported that they published all three documents (governing document, governing structure and names of governing-body members) publicly on their website. This is slightly higher than 2024 (13%), 2023 (10%) and nearly the same as 2021 (17%). Hence the score remains at 1 – does not meet standards.

Disclosure through the official government register was considerably higher for statutory documents, around 60% for the statute, reflecting mandatory registration, but voluntary, web-based transparency about who governs organisations remained partial. Internal organisational policies were the least accessible, with 44% not publishing or sharing them.

Validation participants noted that the deteriorating security environment also influenced disclosure practices. Some organisations reportedly removed information about board members, staff or internal structures from their websites to reduce the risk of targeting.⁸⁰

Indicator 3.1.d – Proportion of CSOs that have an organisational gender equality policy.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	2 – minimally meets standards
2021	3 – moderately meets standards

In the 2025 survey, 49% of respondents reported having an organisational gender equality policy in effect, which is lower than the 58% recorded in 2024, but above the 38% in 2023 and close to the 51% baseline in 2021, consistent with the fluctuation seen across years.

Gender equality remained the most commonly held internal policy, ahead of a safeguarding of children and vulnerable adults policy (46%) and a broader diversity, equality and inclusion policy (25%). The gap between the gender equality and DEI figures suggests gender equality is more often formalised as a standalone commitment than embedded within a wider diversity framework.

Indicator 3.1.e – Proportion of CSOs that have an organisational strategy, including vision, mission and goals.

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	3 – moderately meets standards
2021	4 – meets most standards

In the 2025 survey, 67% of respondents reported having an organisational strategy, strategic plan or similar document, almost identical to the 68% recorded in 2024 and the 70% baseline in 2021, and above the 59% in 2023. Strategic planning thus remained the norm across the sector, while a stable minority of around one in three organisations continued to operate without a documented strategy.

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⁸⁰ Hajde4EU, EU Civil Society Guidelines Assessment for Serbia, Report from the validation workshop with civil society, June 19th, 2026.

SO 3.2 | CSOs are able to communicate the results of their activities to the public.

Indicator 3.2.a – Proportion of CSOs that have at least one online channel of communication.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

In the 2025 survey, online communication remained near-universal: all of the respondents used at least one digital channel at least monthly (94% in 2024, 95% in 2023, 99% in 2021). Facebook remained the most used platform (86%, up from 83% in 2024), followed by Instagram (76%, up from 64%) and the organisation's own website (75%, up from 54%). Messaging apps such as WhatsApp, Signal, Viber and Telegram were used by 55% (26% in 2024) and YouTube by 48% (34% in 2024). LinkedIn (35%) and X/ Twitter (24%) were used by a minority, while TikTok (14%), Threads (5%) and Bluesky (1%) saw limited uptake. The sector communicates actively and regularly, concentrated on the major mainstream networks and its own websites.

Indicator 3.2.b – Proportion of CSOs that have specialised communication staff.

This indicator was not assessed.

Indicator 3.2.c – Proportion of CSOs that cooperate with the media.

In the 2025 survey, 51% of responding CSOs reported partnerships with the media. This is significantly higher than 2024 (30%) and 2023 (32%) and slightly higher than the baseline year (47%).

In previous years, the question related to this indicator asked only about partnerships with the media. This year, however, in addition to partnership, CSOs were also asked whether they consulted with the media. Some 55% of CSOs reported that they engaged with the media through consultation, and only 16% reported no media engagement.

The data indicate that, despite a hostile official environment, civil society maintained and even increased its partnerships with the media sector.

Survey Results

	% CSOs saying they cooperate with the media
2025	51%
2024	30%
2023	32%
2021	47%

SO 3.3 | CSOs are transparent about their programme activities and sources of funding.

Indicator 3.3.a – Proportion of CSOs that publish their annual reports and financial statements.

Year	Compliance
2025	3 – moderately meets standards
2024	2 – minimally meets standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

In the 2025 survey, 57% of the respondents published an annual report and 72% a financial statement, while 16% published neither.

As in 2024, the official government register (the Serbian Business Registers Agency) was the dominant channel for financial statements: around 74% disclosed them there, reflecting the legal obligation to file, with a third (33%) also posting them on a website. Annual reports relied more on voluntary publication: 45% posted them on a website and 34% shared hard copies with members, while 15% did not share them.

In 2025, 42% of responding CSOs published both an annual report and a financial statement via website or hard copy, considerably higher than the 25% in 2024, 16% in 2023 and 31% in 2021. The score is therefore raised to 3 (moderately meets standards), with due attention to monitoring the situation in upcoming cycles, as fewer than half of responding CSOs apply this transparency measure.

Indicator 3.3.b – Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

In the 2025 survey, 27% of the respondents published their sources of funding and 17% the amounts received from each source. Disclosure of specific amounts remained the weakest area of transparency: 36% did not share this information at all and 11% did not record it, while only 16% posted amounts on a website and 21% via official registers.

Funding sources, where disclosed, appeared mainly on websites (43%), official registers (23%) and social media (16%), with 25% not sharing them.

Overall, around 40% of CSOs published both their sources of funding and the amounts received via website or hard copy. For reference, the 2024 Assessment recorded 27% publishing both sources and amounts (19% in 2023, 23% in 2021). Hence, although there has been a considerable increase in the proportion of CSOs applying this transparency measure, as it is still fewer than half of responding CSOs,

the score remains at 2 – minimally meets standards. Detailed financial transparency remains the sector’s clearest accountability shortfall.

Indicator 3.3.c – Degree of public trust in CSOs.

As the Balkan Barometer 2025 detailed report has not yet been published, Serbia-specific figures for public trust in civil society organisations in 2025 could not be drawn. In 2024 this was 41% and in 2023 40%.

SO 3.4 | CSOs monitor and evaluate the results and impact of their work.

Indicator 3.4.a – Proportion of CSOs that have carried out an evaluation of their work in the last year.

Year	Compliance
2025	5 – fully meets standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	5 – fully meets standards

In the 2025 survey, around 82% of the respondents carried out at least one form of evaluation, which is broadly in line with 79% in 2024 and 75% in 2023, though below the 87% baseline in 2021. Project-level evaluation was again the most common, reported by 69% (74% in 2024), followed by evaluation of an internal process (29%, compared with 23%) and evaluation of strategy (22%, compared with 19%). Conversely, 18% carried out no evaluation at all (15% in 2024).

Most organisations therefore routinely assess their projects, while organisation-wide or strategic evaluation is practised by a smaller share.

SO 3.5 | CSOs use research and evidence to underpin their work.

Indicator 3.5.a – Proportion of CSOs whose work is based on evidence generated through research.

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	5 – fully meets standards

In the 2025 survey, 80% of the respondents undertook at least one type of research to inform their work, which is identical to the 80% recorded in 2024, in line with 79% in 2023 and below the 86% baseline in 2021. The most common methods were surveys with specific groups (51%, compared with 47% in 2024), focus group discussions (48%, compared with 42%), desk research (45%, compared with 26%) and field research (39%, compared with 29%). More resource-intensive approaches were rarer: public opinion surveys (21%, compared with 13%) and randomised controlled trials (14%). Some 20%

conducted no research. The sector regularly generates its own evidence, relying mainly on qualitative and targeted survey methods.

Indicator 3.5.b – Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

This year, the relevant question for this indicator was designed differently from previous years, with a view to obtaining a more detailed understanding of CSOs' engagement practices. In the 2025 survey, the question asked about engagement in two separate forms, consultation and partnership, whereas previous years covered consultation only.

In this year's survey, 85% of CSOs reported that they consulted with at least one of the following stakeholders: their own members, local communities, national government, local government, public institutions, the private sector and academia. Although this seems to be a slight decrease from 2024 (91%), 2023 (93%) and 2021 (91%), the partnership disaggregation fills this gap, as an additional 6% of responding CSOs stated that they engaged with these stakeholders through partnerships only. When both consultation and partnership percentages are combined, the figure rises to 91%, similar to 2024 and the baseline year (2021).

With regard to consultation with different stakeholders, the organisation's own members came first (50%; 64% in 2024), followed by public institutions (48%; 28% in 2024), academic institutions (46%; 27% in 2024), local communities (45%; 60% in 2024), local authorities (38%; 34% in 2024), private business (30%; 21% in 2024) and national authorities (30%; 28% in 2024).

In addition, this year's survey included a question on CSOs' engagement practices with other CSOs: 54% of responding CSOs reported consulting other CSOs working in the same or a different thematic area.

SO 3.6 | CSOs work in fair and respectful partnership to achieve shared goals.

Indicator 3.6.a – Proportion of CSOs taking part in local, central and international CSO networks.

In the 2025 survey, 80% of the respondents belonged to at least one civil society network, which is close to the 83% recorded in 2024 (75% in 2023, 77% in 2021), while 20% were not members of any. National networks were the most common (66%, compared with 67% in 2024), followed by international networks (45%, compared with 41%) and local networks (25%, compared with 21%). Organisations remained especially well integrated nationally and substantially connected internationally, with thinner participation in purely local networks.

Survey Results

	% CSOs taking part in local, central and international networks.			
	TOTAL	Local	National	International
2025	80%	25%	66%	45%
2024	83%	21%	67%	41%
2023	75%	18%	56%	42%
2021	77%	N/A	N/A	N/A

A further relevant finding on networking concerns partnership practices with other CSOs in Serbia: 74% of respondents to the 2025 CSO Survey reported partnerships with CSOs working in the same thematic field, while 55% stated that they acted in partnership with CSOs from other thematic fields.

Indicator 3.6.b – Proportion of CSOs engaged in cross-sectoral partnerships with academia, social partners and private sector.

This year, the relevant question for this indicator was designed differently from previous years, with a view to obtaining a more detailed understanding of CSOs' engagement practices. In the 2025 survey, the question asked about engagement in two separate forms, consultation and partnership, whereas previous years covered consultation only. For this indicator, the data below provide statistics on partnership only.

With regard to partnership with academia, social partners and the private sector, 56% of responding CSOs reported acting in partnership with at least one of these stakeholders. This is slightly higher than 2024 (49%).

In the 2025 survey, cross-sectoral partnership was relatively well developed with academia and business but weak with social partners. Academic institutions were the strongest non-CSO partners (partnership 44%), followed by the private sector or businesses (partnership 34%). Social partners (trade unions and employer organisations), with only 13% of CSOs reporting partnerships with them, were the weakest of all stakeholder relationships. The per-sector figures show active partnership with knowledge and market actors and persistently weak links to organised labour.

Survey Results

	% CSOs engaged in cross-sectoral partnerships
2025	56%
2024	49%

SO 3.7 | CSOs have a diversified funding base.

Indicator 3.7.a – Proportion of CSOs whose sources of donor income are diversified.

Year	Compliance
2025	4 – meets most standards
2024	3 – moderately meets standards
2023	4 – meets most standards
2021	3 – moderately meets standards

In the 2025 survey, donor-income diversification appears to have improved modestly. Among the organisations reporting funding composition, around 65% had diversified income in the sense used by the Assessment, meaning that no single source provided more than half of the budget, indicating an increase from 2024 (59%), but slightly less than in 2023 (69%) and much higher than in the baseline year (58% in 2021).

Conversely, about 35% derived more than half their budget from a single source, with that dependence concentrated in bilateral foreign government funding (30% of CSOs reporting they receive more than 50% of their budget), the European Union (22%), followed by foreign foundations, international CSOs, national government and local government (all 11%) and lastly 4% domestic foundations. In addition, 11% of responding CSOs reported having no donor funding and 5% said that they neither received donor funding nor raised funds from other sources.

Regardless of which percentages they provide, the most commonly used funding source was bilateral funds (meaning foreign governments) with 59% of CSOs receiving funding from them. This was followed by the EU (54%), international CSOs (49%), foreign private foundations (43%), local government (34%), UN (26%), national government (24%), domestic private foundations (20%), OSCE and CoE (11%), and lastly provincial/entity level/cantonal government (8%).

The persistence of single-source dependence for around a third of CSOs may be linked to the USAID funding exit, which can also be seen in the increased capacity building demand from CSOs on funding diversification reported by the National Resource Centre.

Indicator 3.7.b – Proportion of CSOs raising funds from sources other than donors (e.g. membership fees, corporate/individual giving and income generating activities)

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In the 2025 survey, self-generated and community-based income was more widespread and utilised compared with previous years. Some 78% of CSOs that participated in the survey reported raising

funds from at least one source other than donors in 2025, compared with 74% in 2024, 69% in 2023 and 73% in 2021. Some 5% of CSOs stated that they did not raise any funds from donors or alternative sources.

The most common non-donor sources among the respondents were the organisation's own income from business, social enterprise or services (44%, up from 28% in 2024), individual donations (39%, up from 33%), private-business or corporate funding (35%, up from 26%), membership fees (28%, up from 23%) and crowdfunding (18%, up from 12%); income from assets was marginal (8%). For almost all of these the contribution sat in the lowest band (25% or less of the budget), confirming that non-donor income typically supplements rather than sustains organisations.

SO 3.8 | CSOs have effective, empowered and developed human resources.

Indicator 3.8.a – Proportion of CSOs that employ staff.

In the 2025 survey, 58% of the responding CSOs employed at least one paid staff member, a decline from the consistent share of around 70% in prior assessments (70% in 2024, 69% in 2023, 71% in 2021), while 42% operated without paid staff (29% in 2024). Among all respondents, 31% employed 1–5 staff (48% in 2024), 11% employed 6–10 (14% in 2024) and 16% employed 11 or more (20% in 2024).

When the data are cross-tabulated by type of CSO, location emerges as the strongest predictor: Belgrade-based organisations employ paid staff at 84% with a median of eight staff, compared with just 42% and a median of one among non-Belgrade organisations, an eightfold difference in median capacity. Conversely, non-Belgrade organisations have a median of 12 volunteers, compared with three in Belgrade-based CSOs. Thematically, advocacy and watchdog-oriented organisations are the best-resourced employers: anti-corruption (83%), human rights (76%), rule of law (75%) and media (72%) all sit well above average, while environment and climate organisations employ paid staff at only 42% with a median of one, and health organisations record the lowest rate of all at 33% with a median of zero paid staff. Conversely, the fields with the highest volunteer medians (rural development (23), humanitarian aid (20) and health (19)) are precisely the same fields that ranked lowest for paid staff employment, reinforcing a clear specialisation axis: advocacy and watchdog organisations (anti-corruption, labour rights, rule of law) run on professional paid staff, while service- and community-oriented organisations rely heavily on volunteer labour.

The decrease in the share of organisations employing paid staff is consistent with the 2025 funding contraction, in which several respondents reported cutting staff. This may be due to the USAID funding exit, but with due attention to the fact that the survey is non-representative, this requires further analysis for certainty.

Survey Results

	% CSOs that employ staff
2025	58%
2024	70%
2023	69%
2021	71%

Indicator 3.8.b – Proportion of CSOs that have organisational human resources policies.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In the 2025 survey, formal HR policies were unevenly adopted, broadly in line with 2024. The percentage of respondents having all nine policies in place is 1%, the same as in 2024. Among the respondents, the most common were a safeguarding of children and vulnerable adults policy (46%, compared with 42% in 2024) and a bullying and harassment policy (31%, compared with 29%); core employment policies were less common, a recruitment policy (24%, compared with 21%), a performance appraisal policy (21%, compared with 20%), a disciplinary policy (16%, compared with 17%), a complaints policy (15%, compared with 18%) and a redundancy policy (4%, compared with 4%).

A diversity, equality and inclusion policy was reported by 25% (45% in 2024); 26% reported that they had none of the listed policies (29% in 2024). Protective and safeguarding measures continued to be prioritised over the standard machinery of employment management.

Indicator 3.8.c – Proportion of CSOs that have advertised publicly their staff and volunteering vacancies in the last year.

This indicator was not assessed.

Indicator 3.8.d – Proportion of CSOs that have organisational policies encouraging recruitment of a diverse workforce.

This indicator was not assessed.

Indicator 3.8.e – Proportion of CSOs whose staff and volunteers have attended a training course in the past year.

This indicator was not assessed.



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List of Laws Consulted

1.	Constitution
2.	Constitution of the Republic of Serbia
3.	Primary Legislation (Laws and Codes)
4.	Criminal Code
5.	Draft Law on Amendments to the Criminal Code
6.	Law on Accounting
7.	Law on Amendments to the Law on Electronic Media
8.	Law on Amendments to the Law on Public Information and Media
9.	Law on Amendments to the Law on Public Media Services (also referred to as the Law on Public Service Broadcasting)
10.	Law on Amendments to the Law on the Prevention of Money Laundering and the Financing of Terrorism
11.	Law on Associations
12.	Law on Auditing
13.	Law on Corporate Income Tax
14.	Law on Culture
15.	Law on Ministries
16.	Law on Personal Income Tax
17.	Law on Police
18.	Law on Prohibition of Discrimination
19.	Law on Property Taxes
20.	Law on Public Administration
21.	Law on Tax Procedure and Tax Administration
22.	Law on the Budget (annual budgets, including the Law on the Budget of the Republic of Serbia for 2026)
23.	Law on the Budget System
24.	Law on the Central Record of Beneficial Owners
25.	Law on the Planning System Law on Value Added Tax (VAT Law)
26.	Law on Volunteering
27.	Public Assembly Act
28.	Secondary Legislation (Regulations, Decrees, and Bylaws)
29.	Decree establishing the Program for financing projects of public interest implemented by associations from extremely underdeveloped municipalities in 2025
30.	Decree establishing the Program for support in implementing the gender equality policy for 2025
31.	Decree on Public Policy Management Methodology
32.	Decree on Regulatory Impact Assessment
33.	Government's Rules of Procedure

34.	Guidelines of the National Bank of Serbia (NBS) for the application of the Law on the Prevention of Money Laundering and Terrorism Financing
35.	Instruction for conducting training in the field of preventing corruption and strengthening integrity (adopted by the Agency for Prevention of Corruption)
36.	Regulation on Funds to Encourage Programmes or Provide Missing Funds to Finance Programmes of Public Interest Implemented by Associations (2018 Regulation)
37.	Rulebook establishing the Unified Information System for implementing and monitoring co-financing of public information projects
38.	Rulebook on the Methodology for Executing Tasks in Accordance with the Law on the Prevention of Money Laundering and the Financing of Terrorism (adopted by the Minister of Finance)
39.	Draft Legislation
40.	Draft Criminal Code Law
41.	Draft law on agents of foreign influence
42.	Draft Law on Nature Protection



Comparative Scores Table per Indicator 2021-2025

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
		SO1 - Enabling Environment for CSOs																											
1.1.a	Extent to which relevant domestic legislation provides for freedoms of association, assembly and expression	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	4	4	4	4	3	1
1.2.a	Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights	3	4	4	3	4	2	2	3	4	4	4	4	3	2	3	4	4	4	4	3	2	3	4	3	4	4	3	2
1.2.b	Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment	3	2	4	3	4	2	1	4	2	4	4	4	3	1	5	2	4	4	4	3	1	5	3	4	4	4	3	1
1.3.a	Extent to which laws to combat extremism, terrorism, money laundering and corruption do not unduly restrict legitimate activities of CSOs	4	3	4	4	4	3	1	4	3	4	5	4	3	1	4	2	4	5	4	3	1	4	2	4	5	4	3	1

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.4.a	Extent to which laws (1) do not require CSOs to submit more reports and information, and (2) do not submit CSOs to more inspections and sanctions, than business entities	5	5	5	5	5	3	1	5	4	5	5	5	4	1	5	4	5	5	5	4	1	5	5	5	5	5	4	1
1.5.a	Small community/local organisations and civic initiatives are allowed to operate by law without registering	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2
1.5.b	In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision making processes as registered CSOs	4	4	4	3	4	4	2	4	4	4	3	4	4	2	4	4	4	3	4	5	2	4	4	4	3	4	5	2
1.6.a	Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions	5	3	5	5	5	4	2	5	3	5	5	5	5	2	5	3	5	5	4	5	2	5	4	5	5	4	5	2

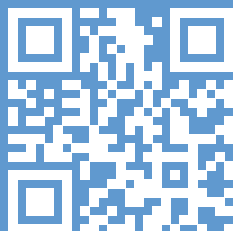
		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.7.a	The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law	1	2	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	1	2	1
1.7.c	Extent to which legal provisions regulating the award of public funding to CSOs ensure that it is clear, impartial and well regulated	4	2	4	3	2	2	1	4	3	4	3	2	2	1	4	3	4	3	2	2	1	3	3	4	3	2	2	1
1.7.d	Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards	2	2	4	5	2	2	2	2	2	4	5	2	3	2	1	2	4	5	2	2	2	1	2	4	5	2	2	2
1.7.e	Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory	2	1	3	2	2	1	1	1	2	2	1	1	1	1	1	1	2	1	1	1	1	2	1	1	1	1	1	1
1.8.a	Tax legislation allows for tax relief as regards individual and corporate giving	2	3	5	5	3	3	2	2	3	5	3	3	3	2	2	3	5	4	3	3	2	2	3	5	4	3	3	2

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.9.a	Extent to which applicable tax laws provide for appropriate tax benefits for CSOs	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
1.10.a	Laws regulating volunteering are adopted	3	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1
1.10.b	G o v e r n m e n t volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation	1	1	2	3	3	3	1	1	1	2	1	3	3	1	1	3	2	1	3	3	1	1	3	2	1	3	2	1
SO 2 - Cooperation Between Government and CSOs																													
2.1.a	Laws, bylaws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs	3	2	3	3	2	2	1	3	2	3	4	2	2	1	3	2	3	4	2	1	1	3	2	3	4	2	2	1
2.2.a	Extent to which CSOs assess the attitude of public officials towards civil society as supportive	1	1	2	3	1	1	1	3	1	2	1	1	1	2	2	2	2	1	2	1	2	2	1	2	1	1	1	1
2.3.b	Currently valid civil society cooperation strategies are adopted	1	2	1	5	5	5	1	1	1	1	5	5	5	1	5	1	5	5	5	5	1	5	1	5	1	1	1	1
2.3.c	Civil society cooperation strategies are accompanied by adopted budgeted action plans	1	2	1	5	4	4	1	1	1	1	5	3	1	1	1	1	5	5	3	5	1	1	1	5	1	1	1	1

		2025							2024							2023							2021							
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	
2.3.f	Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs:	2	1	1	3	5	2	1	3	4	1	1	1	3	1	4	4	3	1	1	4	2	4	4	3	3	5	1	2	
SO 3 - Capacity and Accountability of CSOs																														
3.1.a	Proportion of CSOs that have an independent and effective governing body with clear terms of reference	3	4	4	4	4	4	4	3	3	3	2	3	3	2	4	3	3	3	3	3	3	3	3	3	3	3	2	3	2
3.1.b	Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body	3	2	3	3	2	2	3	2	1	2	1	1	1	1	2	1	2	1	1	1	1	1	1	1	2	1	2	1	1
3.1.c	Proportion of CSOs that share relevant information on their organisation using means and channels that are accessible to all stakeholders	2	1	2	3	2	1	3	1	2	1	2	2	1	3	1	1	1	1	3	1	3	2	2	2	2	2	1	3	
3.1.d	Proportion of CSOs that have an organisational gender equality policy	3	3	3	2	3	3	3	3	2	3	2	2	3	3	3	2	3	2	2	2	3	3	2	3	2	2	3	3	

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.1.e	Proportion of CSOs that have an organisational strategy, including vision, mission, and goals	4	4	4	3	5	4	4	4	4	4	4	4	4	3	4	4	4	3	4	3	4	4	3	4	3	5	4	3
3.2.a	Proportion of CSOs that have at least one on-line channel of communication	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
3.3.a	Proportion of CSOs that publish their annual reports and financial statements	3	3	2	4	4	3	3	2	2	1	2	3	2	2	2	3	2	2	3	2	2	3	3	3	3	4	3	3
3.3.b	Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year	3	3	2	3	3	2	2	2	2	2	2	2	2	1	2	2	1	2	2	1	2	2	2	2	2	2	2	2
3.4.a	Proportion of CSOs that have carried out an evaluation of their work in the last year	5	5	4	4	5	5	5	5	5	4	5	4	4	4	5	5	4	4	5	4	5	5	4	4	4	4	5	5
3.5.a	Proportion of CSOs whose work is based on evidence generated through research	4	5	4	4	4	4	5	5	4	5	4	4	4	4	5	5	4	5	4	4	5	5	4	5	4	4	5	5
3.5.b	Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.7.a	Proportion of CSOs whose sources of donor income are diversified	4	4	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	4	3	4	4	4	4	3	3	3	3	4
3.7.b	Proportion of CSOs raising funds from sources other than donors	3	5	3	3	4	4	5	3	4	3	3	4	4	4	4	4	3	3	4	4	5	4	4	4	3	5	4	5
3.8.b	Proportion of CSOs that have organisational human resources policies	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1



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