

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

2025 Assessment

REGIONAL REPORT





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

IPA beneficiary Analysis:

Albania - Irena Topalli

Bosnia and Herzegovina - Goran Kucera

Kosovo - Taulant Hoxha

Montenegro - Mirela Rajkovic

Republic of North Macedonia - Elizabeta Markovska Spasenoska

Serbia - Milica Skiljevic

Türkiye - Özge Konuralp

Key Experts:

Team Leader - Behrooz Motamed-Afshari

Analysis and Strategy Expert - Selen Lermioğlu Yılmaz

Dialogue and Outreach Expert - Emina Nuredinoska

Legal Advisors:

Serbia - Prof. Dejan Vučetić

Türkiye - Assoc. Prof. Dr. Ulaş Karan

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List of Abbreviations

AML/CFT	Anti-money laundering and combating the financing of terrorism
AL	Albania
ASCS	Agency for the Support of Civil Society, Albania
BA	Bosnia and Herzegovina
BiH	Bosnia and Herzegovina
BO	Beneficial owner
CAF	Charities Aid Foundation, United Kingdom
CIVICUS	World Alliance for Citizen Participation
CSO	Civil society organisation
DEI	Diversity, equality and inclusion
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
ECtHR	European Court of Human Rights
ENER	Single National Electronic Register of Regulations, Republic of North Macedonia
EU	European Union
EUR	Euro
FATF	Financial Action Task Force
FBIH	Federation of Bosnia and Herzegovina
FRA	European Union Agency for Fundamental Rights
HR	Human resources
IPA	Instrument for Pre-accession Assistance
KCSF	Kosovar Civil Society Foundation
LGBTIQ+	Lesbian, Gay, Bisexual, Trans, Intersex, Queer
ME	Montenegro
MK	Republic of North Macedonia
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
MP	Member of Parliament
NGO	Non-governmental organisation
NPO	Not-for-profit organisation
RS	Serbia
RSD	Serbian Dinar
SLAPP	Strategic lawsuit against public participation

TR	Türkiye
USAID	United States Agency for International Development
XK	Kosovo
VAT	Value added tax

Glossary

Civic space: The report accepts the following definition of civic space as provided in the UN and as referred to by the EU Agency for Fundamental Rights (FRA): *Civic space is the environment that enables people and groups - or 'civic space actors' - to participate meaningfully in the political, economic, social and cultural life in their societies. Vibrant civic space requires an open, secure and safe environment that is free from all acts of intimidation, harassment and reprisals, whether online or offline.*¹

This is further explained by the OHCHR: *Civic space is the environment that enables civil society to play a role in the political, economic and social life of our societies. In particular, civic space allows individuals and groups to contribute to policy-making that affects their lives, including by accessing information, engaging in dialogue, expressing dissent or disagreement, and joining together to express their views.*²

Civil society: Civil society in this report, resonates with the EUR Lex, which refers to all forms of social action carried out by individuals or groups who are neither connected to nor managed by state authorities³. Furthermore, the report relies on the following definition used by the UN when defining civil society: *... the associations of citizens (outside their families, friends and businesses) entered into voluntarily to advance their interests, ideas and ideologies. The term does not include profit-making activity (the private sector) or governing (the public sector).*⁴

Civil society organisations (CSOs): The report is fully aligned with the definition laid down in the EU Civil Society Strategy, which defines CSOs as: *...all non-State, not-for-profit, independent, non-partisan and non-violent organisations, through which people pursue and defend shared objectives and ideals. They are self-governing entities which are independent from government or from business interests, ranging from informal, to semi-formal and formal groups, and can be membership-based, cause-based, or service-oriented. They can operate at the local, regional, national and international level, and be run by volunteers and/or paid staff.*⁵

Enabling environment for civil society: The report uses the term in resonance with the EU System for an Enabling Environment for Civil Society (EU SEE): *An enabling environment is one where civil society can thrive, express itself freely, and actively engage in shaping its context... It describes an environment that not only respects and protects fundamental freedoms but also facilitates the effective work of civil society. The autonomy and operational freedom of civil society must be ensured.*⁶

DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region (2021-2027) identifies three pillars (objectives) for this environment: (1) A conducive environment for civil society to carry out its activities, (2) Strengthened cooperation and partnership between CSOs and public institutions, and (3) Reinforced CSO capacity and resilience to carry out their activities effectively.



¹ <https://fra.europa.eu/en/cooperation/civil-society/civil-society-space>

² <https://www.ohchr.org/en/civic-space>

³ <https://eur-lex.europa.eu/EN/legal-content/glossary/civil-society-organisation.html>

⁴ <https://docs.un.org/en/A/58/817>

⁵ https://commission.europa.eu/document/download/8c30975d-bc1c-4415-8dcd-a71cb28f3662_en?filename=JUST_template_com-ingsoon_standard.pdf

⁶ <https://eusee.hivos.org/about/enabling-principles/>

Executive Summary

This report presents the fourth assessment against the revised DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region, 2021-2027⁷. The Guidelines set out the results that EU support to civil society in the seven beneficiaries of the Instrument for Pre-Accession (IPA⁸ seeks to achieve over these seven years. The 2025 assessment provides evidence against the Guidelines' indicators for Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, the Republic of North Macedonia, Serbia and Türkiye, examining developments under each specific objective and focusing on changes since the previous assessment for 2024, as well as the 2021 baseline, in order to identify trends over time.

The analysis presented in this report is based on data collected from primary and secondary sources by the Hajde4EU team. Primary research included surveys of CSOs, a dedicated key CSOs survey focusing on organisations working on the enabling environment and civil society capacity, and a survey of public officials, as well as focus group discussions with CSO representatives, interviews with relevant public institutions and EU Delegations, and a legal analysis of relevant laws carried out by Co-ordinators for IPA beneficiaries and external legal experts where needed. Secondary sources such as reports produced by CSOs, national human rights institutions, governments and international organisations were used for additional information and triangulation. The wider CSO survey was circulated broadly and elicited 626 responses from across the region, while the specialised CSOs survey received 50 responses; the survey of public officials targeted those officials in all IPA beneficiaries with experience of engaging with CSOs or working on CSO issues and received 98 responses.

This assessment is published in a global context where civic space continues to deteriorate, as confirmed by numerous monitoring frameworks. The CIVICUS Monitor's 2025 "People Power Under At-tack" report documents that civic freedoms are under severe pressure in a record number of countries worldwide. Serbia was downgraded in 2025 by CIVICUS to the "repressed" category, reflecting serious and routine restrictions on freedoms of association, peaceful assembly and expression. In 2025, according to this Monitor, Serbia and Türkiye were classified as "repressed", Bosnia and Herzegovina remained "obstructed", while Albania, Kosovo, Montenegro and the Republic of North Macedonia continued to be in the "narrowed" group.

At EU level, recent evidence from the European Commission's Rule of Law reports⁹ and the European Union Agency for Fundamental Rights (FRA) reports confirm that shrinking civic space has become a systemic concern across the EU.¹⁰ FRA's 2025 Fundamental Rights Report¹¹ and Civic Space Update¹² show a marked deterioration in the operating environment for CSOs in recent years, with around

⁸ The Instrument for Pre-accession Assistance (IPA) is the means by which the EU has been supporting reforms in the enlargement region with financial and technical assistance since 2007. IPA funds build up the capacities of the beneficiary countries throughout the accession process, resulting in progressive, positive developments in the region. Currently IPA beneficiaries include Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Serbia and Türkiye. IPA III instrument (2021-2027) aims to support the beneficiary countries in adopting and implementing the political, institutional, legal, administrative, social and economic reforms required by those beneficiaries to comply with Union values and to progressively align to Union rules, standards, policies and practices with a view to Union membership, thereby contributing to their stability, security and prosperity. For more information: https://enlargement.ec.europa.eu/funding-technical-assistance/overview-instrument-pre-accession-assistance_en

⁹ https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters_en

¹⁰ <https://fra.europa.eu/en/news/2025/fra-statement-recent-developments-affecting-civil-society-and-fundamental-rights>

¹¹ <https://fra.europa.eu/en/publication/2025/fundamental-rights-report-2025>

¹² <https://fra.europa.eu/en/publication/2026/civic-space-update>

* 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

three-quarters of surveyed organisations reporting barriers to carrying out human-rights work, and a growing use of restrictive legislation, surveillance technologies and administrative or financial measures targeting CSOs, human-rights defenders, journalists and protesters. The agency highlights cumulative challenges, from limits on peaceful assembly and foreign-funding-related restrictions, to stigmatising narratives and attempts to dissolve or defund organisations.

According to the European Commission's Rule of Law Report, based on its assessment across four countries in the Western Balkans (Albania, Montenegro, the Republic of North Macedonia and Serbia), the legislative quality and inclusive policymaking remain uneven. The Report finds that Albania and Montenegro struggle with weak public consultations, the Republic of North Macedonia lacks evidence-based policy processes, and the Serbian Parliament remains hampered by infrequent sessions and limited genuine debate, while civil society in these countries - though generally remaining free to operate - faces a continuing trend of new legal restrictions, registration constraints, funding shortfalls, physical and verbal attacks, and hate speech. The Report identifies Serbia as standing out for facing increasing pressure and attacks on civil society¹³.

These global and regional assessments resonate closely with this report's own findings, where legal guarantees for fundamental freedoms formally remain in place but the practical space for rights-based CSOs and journalists continues to shrink, especially in Serbia and Türkiye.¹⁴

In 2025, the regional context for civil society was further complicated by abrupt changes in international funding, most notably the suspension and planned termination of a large share of United States Agency for International Development (USAID) programmes under executive orders of the US administration. A three-month global freeze on most US foreign aid, including USAID support, left numerous civil society, human rights and independent media actors in the Western Balkans and Türkiye in limbo and disrupted ongoing rule-of-law, anti-corruption and democracy-support initiatives, reinforcing the scarcity of sustainable funding and amplifying the risks identified in this report: shrinking civic space, heightened political pressure and weak domestic support frameworks for independent civil society.

The assessment shows a varied picture at beneficiary level, with some IPA beneficiaries and indicators improving while others decline, but the overall trend in implementing the Guidelines across the region continues to be negative for a third consecutive cycle. The legal frameworks for association, assembly and expression are largely stable, yet foreign-agent narratives, restrictive policing of protests, SLAPPs and digital censorship further constrain civic space, and constitutional or judicial safeguards are often insufficient to counteract hostile political environments. Cooperation between public authorities and civil society still requires substantial improvement in the following areas:

- a) legal safeguards for consultation, to better address absent or discretionary frameworks;
- b) implementation of existing rules, to remedy late publication of drafts, patchy feedback on comments, over-use of expedited procedures and online platforms treated as formalities;
- c) effectiveness of consultation, to close the gap between those CSOs reporting participation and those experiencing processes that only meet basic criteria;
- d) inclusiveness of working groups, to introduce public calls and transparent selection criteria so that smaller, newer and rights-based organisations are no longer under-represented;
- e) functioning of cooperation councils and strategies, to reactivate bodies that are non-operational or frozen and to renew expired strategies;

¹³ https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters_en

¹⁴ This report does not separately assess the economic condition of the media sector during 2025 - including the effects of the loss of United States funding, the allocation of state advertising, and ownership concentration - Even though independent outlets in several beneficiaries are constituted as civil society organisations and fall within the scope of the Guidelines, this report does not separately assess the economic condition of the media sector during 2025, including the effects of the loss of US funding. Media is addressed here only in relation to the freedom of expression and in the context for CSOs operating environment under SO1.

- f) the perception gap, to reconcile those officials rating consultations effective by and large with only 17% of CSOs finding institutions supportive;
- g) CSO accountability and financial transparency, to raise the number of CSOs publishing governance information and those disclosing funding sources and amounts;
- h) funding diversification, to reduce the share of donor-funded CSOs dependent on a single donor type and to address the vulnerability of those operating without any donor funding; and
- i) human resources policies, to move beyond the very low number of CSOs holding a full set and the one quarter holding none.

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

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.

With regards to a conducive environment for civil society to carry out its activities, the 2025 assessment confirms that legal frameworks remain broadly stable, but civic space continues to shrink in practice, with clear cross-beneficiary differences. Across indicators under this pillar, the overall picture is relatively stable or slightly improving in **Albania, Kosovo, Montenegro** and the **Republic of North Macedonia**. It remains weak and largely static in **Bosnia and Herzegovina**, while conditions deteriorated in **Serbia** and remained persistently very restrictive in **Türkiye**.

On fundamental freedoms, all countries continue to provide formal guarantees for association, peaceful assembly and expression, and most laws moderately or mostly meet standards. However, implementation gaps and hostile practices undermine these rights, especially in Serbia and Türkiye: civic space in **Serbia** is now assessed by CIVICUS as “repressed”, with multi-layered pressure on rights-based CSOs, protests and media; **Türkiye**’s civic space remains under severe pressure, with blanket protest bans, aggressive policing and criminalisation of journalists and activists. **Kosovo, Montenegro** and the **Republic of North Macedonia** maintain legal frameworks largely aligned with European and international standards but face ongoing problems such as SLAPPs, weak enforcement of media protections, fragmented assembly rules and occasional law enforcement overreach. **Albania** shows partial progress on defamation and press freedom, but faces constraints on online freedom of expression, and disinformation campaigns targeting rights-based CSOs. **Bosnia and Herzegovina** saw constitutional review strike down a foreign-agent-style law in Republika Srpska yet continued to struggle with criminal defamation and SLAPPs.

CSOs generally have access to legal remedies and oversight institutions to challenge decisions affecting their rights, but these remedies are often slow, uneven and lack anti-SLAPP safeguards, so abusive litigation and harassment remain effective tools to chill civic participation. Protection from threats, attacks and discriminatory treatment is patchy: several countries report continuing intimidation, smear campaigns and occasional violence against CSOs and journalists, with **Serbia** and **Türkiye** again standing out as the most problematic cases.

In the area of funding and taxation, **Bosnia and Herzegovina** avoided formal restrictions thanks to Constitutional Court intervention against the RS foreign-agents law but still operates in a climate of

uncertainty for foreign-funded organisations, while **Albania, Kosovo, Montenegro** and the **Republic of North Macedonia** continue to provide liberal legal access to a broad range of domestic and foreign funding sources. **Serbia** remains legally open to diverse funding yet pending foreign-agents' proposals increase compliance burdens and bank scrutiny, meaning the environment is no longer fully enabling; **Türkiye's** legal framework continues to impose disproportionate reporting and fundraising rules on CSOs, especially those relying on foreign funding or public collections.

Public funding to CSOs in 2025 was significant in value but structurally fragmented and lacked transparency: while identifiable allocations ranged from EUR 2 million in **Albania** and EUR 5.7 million in **Montenegro** to nearly EUR 430 million in **Türkiye**, most countries lacked consolidated, CSO-specific reporting on who received what and under which criteria, and broader budget transfers to non-profits were often awarded without unified frameworks or robust conflict-of-interest safeguards.

Volunteering and CSO employment policies show only modest progress. **Albania's** new Volunteering Law and **Montenegro's** Volunteering Strategy mark positive steps, but in **Bosnia and Herzegovina, Kosovo, Serbia** and **Türkiye**, due to the absence of dedicated volunteering legislation, volunteering is regulated through the lens of labour law rather than a dedicated framework, and most CSO volunteering remains self-organised rather than backed by structured state support. The **Republic of North Macedonia**, by contrast, has a Law on Volunteering in force, but its National Volunteering Programme and National Volunteering Body remain non-operational. In countries where labour-market data exist, CSO employment accounts for under 1% of total jobs in most countries, **Kosovo** being the exception with the highest share, at 3.9%.

Overall, 2025 findings show an enabling environment that is formally present but substantively fragile: core rights remain legally recognised, yet hostile narratives, enforcement gaps, weak economic incentives and underdeveloped volunteering and employment frameworks continue to erode the space in which civil society can operate safely, sustainably and with confidence.

Specific Objective 2: Strengthened 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.

Cooperation and partnership between CSOs and public institutions continued to face significant challenges, with a polarised picture across the region. Across the indicators under this Specific Objective, the situation weakened in **Albania** and **Bosnia and Herzegovina**, remained low and stagnant in **Kosovo** and **Türkiye**, improved in **Serbia** and more markedly in the **Republic of North Macedonia**, and was the strongest in **Montenegro**, where it continued to advance. These patterns reflect a context in which formal frameworks for consultation and cooperation exist but are still unevenly implemented, and effective, timely participation remains rare.

Legal provisions for public consultation largely remained in place in 2025, yet the gap between law and practice persisted: **Kosovo, Montenegro** and the **Republic of North Macedonia** had the most favourable frameworks with clear rules on early access and 15-30 day comment periods, **Albania** and **Bosnia and Herzegovina** applied existing rules inconsistently, with drafts often provided to CSOs in the later stages of the process, limiting their influence on final decisions, while **Serbia** and **Türkiye** offered the

least enabling environments due to loopholes and fully discretionary consultations. Online platforms existed in all countries apart from **Montenegro** and **Türkiye** but were under-used or treated as formalities, and expedited procedures continued to bypass or compress consultation particularly in Bosnia and Herzegovina, the Republic of North Macedonia and Serbia.

Survey data show that participation rarely means effective influence: 58% of CSOs reported joining at least one consultation, yet only 6% experienced processes that met basic effectiveness criteria, with particularly sharp gaps in **Albania** (68% involved vs. 4% effectively consulted) and **Serbia** (64% vs. 9%), and even in **Montenegro** and the **Republic of North Macedonia** with effective consultations staying below roughly 10-16% of engaged CSOs. CSOs' assessments of public institutions were mostly critical or ambivalent (only 17% described attitudes as supportive), while around 88% of public institutions saw themselves as supportive, revealing a wide perception gap.

The existence and functioning of civil-society cooperation strategies and government-CSO consultation mechanisms varied considerably across the region in 2025. **Montenegro**, the **Republic of North Macedonia** and **Serbia** maintained or adopted valid civil-society cooperation strategies and recorded higher scores, with relatively structured consultation processes around new strategies in the **Republic of North Macedonia** and **Kosovo** and the start of the first state-level strategy in **Bosnia and Herzegovina**. However, expired strategies in **Albania** and **Kosovo** were not renewed in 2025, while **Türkiye** continued to lack a strategy altogether. **Montenegro** re-established its Government-NGO Council with rules of procedure and a 2026 work plan; the **Republic of North Macedonia's** restructured cooperation council met seven times in 2025, adopted a working programme, influenced key laws and funding decisions, and operated transparently with published agendas, minutes and follow-up. In **Albania** the Council met at least once and published minutes, but lacked an annual work plan, regular meetings or clear follow-up. **Bosnia and Herzegovina's** Advisory Body of the Council of Ministers and **Kosovo's** Council for Government Cooperation with Civil Society were effectively non-operational, as mandates expired and no new members were appointed. In **Serbia** CSO members have frozen their participation in the Council, the Council was not functional in 2025, and CSOs were not involved in monitoring and evaluating the Strategy, while **Türkiye's** Civil Society Consultation Council remained inactive and no alternative national-level mechanism existed.

Overall, the 2025 findings indicate that cooperation frameworks are becoming more widespread, and scores are improving in a few countries, but meaningful, early and inclusive participation is still the exception, and a widening perception gap between CSOs and public officials continues to undermine genuine partnership.

Specific Objective 3: CSOs' capacities and resilience in carrying out their activities are strengthened

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.

CSOs' capacity and resilience across the region strengthened in formal terms, even as the hostile environment and shrinking civic space continued to undermine safety and effectiveness. Across the indicators under this Specific Objective, the picture was strong or improving in all seven countries, reflecting

broad uptake of governance structures, strategies and communication tools.¹⁵ In 2025, this pillar paints a cautiously positive picture: CSOs report stronger formal internal governance, transparency and learning practices, but these gains sit within a hostile and shrinking civic space, and most indicators capture the existence of internal policies rather than how robustly they are implemented. Around 88% of CSOs report having an independent and effective governing body, indicating that governance structures have become nearly universal, while about 57% say they regularly check conflicts of interest among governing-body members, showing progress that has not yet become standard practice. At the same time, only about 30% publish their statutes, governance structures and governing-body membership, and roughly 44% disclose both funding sources and amounts received, with organisations working on sensitive human-rights and watchdog agendas often limiting disclosure due to security and reputational concerns.

Communication and organisational learning are clear strengths. In 2025, all participating CSOs use at least one online communication channel, and 38% indicated some form of cooperation with media outlets, a notable recovery from previous years' declines and a sign of renewed engagement with journalists. Around four-fifths of organisations report conducting at least one piece of research in 2025, 89% consult with stakeholders, members, local communities and local authorities among the most frequently involved groups. Networking is nearly universal: 84% of CSOs participate in at least one local, national or international network; cross-sector partnerships with academia, social partners and the private sector remain substantial, with 53% having at least one formal partnership and another 24% engaging these actors by consultation, bringing overall engagement to around 77%. Organisational learning is also widespread: 84% of CSOs say they carried out at least one evaluation of their work in the past year, and 74% report having an organisational strategy or strategic plan, suggesting that reflection and forward-planning are increasingly embedded practices across the sector.

Financial resilience and human-resources systems show more modest but important improvements. Among CSOs that receive donor funding, 57% report a diversified donor base where no single donor type provides more than half of their income, up from earlier years, while 24% say they operate without any donor funding at all, a growing donor-free segment that is small in some countries but much larger in others, especially Montenegro and Türkiye, with mixed implications for autonomy and vulnerability.

Only about 2% of CSOs report having a full set of key human resources policies in place, therefore comprehensive HR frameworks remain the exception; however, the share of organisations with no HR policies at all has fallen sharply from around half to roughly one-quarter, indicating that many CSOs are at least putting basic rules and procedures in place. Internal safeguarding policies for children and vulnerable adults for employees and volunteers have become the most widely adopted HR measure, followed by diversity, equality and inclusion policies, bullying and harassment policies, and then recruitment and performance appraisal, while redundancy policies remain rare. Gender-equality policies are now present in just over half of CSOs, particularly among those working on gender, LGBTIQ+, human rights, social inclusion and youth, though large parts of the sector still operate without a formal equality framework.

Overall, the 2025 findings under Specific Objective 3 suggest that CSOs are gradually strengthening their formal governance structures, strategic planning, conflict-of-interest checks, communication, diversified funding and elements of HR policy, while persistent gaps in proactive transparency, equality mainstreaming and deep accountability limit how far this resilience can translate into substantive protection and effectiveness in practice.

¹⁵ It is important to keep in mind that the scores are based on survey responses, meaning that they are self-reported and based on whether policies or structures exist, not how robust or consistently implemented they are, so high scores do not necessarily translate into strong accountability or protection on the ground.

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	Government 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	
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	

		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
3.2.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
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	4	3	3	3	4

		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.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



Introduction

This report presents the 2025 assessment against the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027¹⁶. The Guidelines set out the results that EU support to civil society in the region is intended to achieve over this seven-year period, and each annual assessment measures how far those results have been reached. This is the fourth such assessment, following the 2021 baseline and the assessments of 2023 and 2024. It examines the situation in 2025 across the seven Instrument for Pre-Accession (IPA) beneficiaries: Albania, Bosnia and Herzegovina, Kosovo, Montenegro, the Republic of North Macedonia, Serbia and Türkiye.

The Guidelines are built around three outcomes that together, underpin a healthy participatory democracy, and to which a strengthened civil society contributes as the region moves closer to the European Union. The first is that a conducive environment for civil society to operate is a basic precondition of democracy. The second is that genuine cooperation and partnership between civil society organisations and public institutions is part of what makes a democracy participatory. The third is that civil society organisations need the capacity and resilience to work effectively if they are to be credible and productive actors in public life. The indicators that give these outcomes practical form are grounded in European and international standards, including the EU rule of law *acquis*, international human rights law and recognised standards of civil society accountability, and draw on the recommendations and guidance of international organisations and inter-governmental bodies.

Assessed year on year, the indicators give everyone with a stake in the region's civil society - EU Institutions and Bodies, civil society, and national policymakers and officials - a consistent body of evidence on how the situation is developing in relation to the three objectives. The purpose is not to rank or grade for its own sake, but to make change visible over time and to ground the dialogue between the European Union, the public authorities and civil society in shared, comparable information.

This report does not attempt a single, consolidated analysis of the region as a whole. Instead, it draws out the most significant developments, positive and negative, in each IPA beneficiary under each of the three objectives, with an eye to the trends that are emerging over successive assessments. Because civil society in the seven IPA beneficiaries operates in markedly different legal, political and institutional settings, the picture is inevitably uneven, and the report treats each context on its own terms rather than flattening the differences between them.

The regional report is accompanied by reports of seven IPA beneficiaries. The methodology is set out in the following section; the substantive findings are then presented objective by objectives. Throughout, the regional report should be read together with the IPA-beneficiaries' reports, which contain the detailed indicator assessments and the full references to sources. To avoid duplication, the regional report cites sources only where the underlying data is not already referenced at country level.

The regional report is not the only source assessing civil society in the IPA region, which is among the most closely observed anywhere. It joins a well-established landscape of recurring assessments, notably BCSDN's annual Monitoring Matrix on the Enabling Environment for Civil Society Development, the European Civic Forum's annual Civic Space Report, and the European Union Agency for Fundamental Rights (FRA) civic space monitoring, alongside the European Center for Not-for-Profit Law's (ECNL) in-depth, country-specific work on emerging civic space issues. Our assessment is deliberately complementary rather than duplicative: anchored specifically in the Guidelines for EU Support to Civil Society

¹⁶ https://enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027_en

in the Enlargement Region and designed to serve upstream advisory needs, it draws on and cross-references these existing sources rather than reproducing them.

The 2025 assessment takes place against a demanding backdrop for civil society, both globally and within the region, marked in several beneficiaries by pressure on civic space, a more difficult funding landscape following reductions in international assistance, and legislative initiatives whose implications for the sector are examined in the chapters that follow. At the same time, the accession process continues to offer an important point of leverage for strengthening the environment in which civil society operates. The assessment aims to document both dimensions accurately, and to do so within the temporal scope of 2025, noting more recent developments only where this is necessary to make a finding intelligible.

This report and its annexes are available in the Hajde4EU document library on hajde4eu.org.

The full Guidelines and their Explanatory Note with a detailed explanation of each indicator, and its basis in European and international standards, can be found at: https://enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027_en



Methodology

This report presents the 2025 assessment against the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027. It provides evidence on the situation against the Guidelines for 2025 in the seven IPA beneficiaries: Albania, Bosnia and Herzegovina, Kosovo, Montenegro, the Republic of North Macedonia, Serbia and Türkiye. It is accompanied by reports of seven IPA beneficiaries, which set out the detailed indicator assessments and the sources on which they rely. The regional report should be read in conjunction with the reports of IPA beneficiaries and includes references to sources only where the data are not already cited at country level.

The assessment considers each IPA beneficiary against three Specific Objectives. The first concerns whether the environment allows civil society to operate freely (SO1); the second, the strength of co-operation and partnership between CSOs and public institutions (SO2); and the third, the capacity and resilience of CSOs themselves (SO3). The 3 objectives and related indicators are presented in the table below:

Summary of Objectives		
Specific Objective 1	Specific Objective 2	Specific Objective 3
A conducive environment for civil society to carry out its activities is in place	Strengthened cooperation and partnership between CSOs and public institutions	CSO capacity and resilience to carry out their activities effectively are reinforced
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 SO 1.2. Public authorities protect CSOs from interference and attacks and respect their right to privacy 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 SO 1.4. Public authorities treat all CSOs equally with regards to their operations, and equitably with other entities (such as businesses) SO 1.5. Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grassroots organisations)	SO 2.1. Public authorities and institutions include CSOs in decision- and policy-making processes SO 2.2. Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes SO 2.3. Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms	SO 3.1. CSOs' internal governance structures follow the principles of good governance SO 3.2. CSOs are able to communicate the results of their activities to the public SO 3.3. CSOs are transparent about their programme activities and sources of funding SO 3.4. CSOs monitor and evaluate the results and impact of their work SO 3.5. CSOs use research and evidence to underpin their work SO 3.6. CSOs work in fair and respectful partnerships to achieve shared goals SO 3.7. CSOs have a diversified funding base SO 3.8. CSOs have effective, empowered and developed human resources

Summary of Objectives		
Specific Objective 1	Specific Objective 2	Specific Objective 3
A conducive environment for civil society to carry out its activities is in place	Strengthened cooperation and partnership between CSOs and public institutions	CSO capacity and resilience to carry out their activities effectively are reinforced
SO 1.6. All CSOs are free to solicit and receive funding 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 SO 1.8. Individuals and corporations enjoy tax benefits for their donations to CSOs SO 1.9. Tax benefits are available to CSOs SO 1.10. The policies and legal environment provide incentives and facilitate volunteering and employment in CSOs		

Most indicators pair a numerical grade with a short qualitative narrative. Where a grade applies, it runs on a five-point scale, from 5, where standards are fully met, to 1, where they are not, and serves as a visual shorthand for a judgement explained more fully in the relevant IPA beneficiary report. A smaller set of indicators tracks year-on-year trends against the 2021 baseline rather than carrying a grade of their own.

For indicators that have a normative assessment, such as compliance with legislation or standards, the following traffic-light system was used to provide a quick visual guide:

	5 – fully meets standards
	4 – meets most standards
	3 – moderately meets standards
	2 – minimally meets standards
	1 – does not meet standards

The traffic light system was applied to those indicators where such an assessment was deemed meaningful. It was based either on the data collected through the CSO survey or on the detailed analysis of applicable laws, policies and procedures against the indicators. The justification of the assessment is available in the reports of respective IPA beneficiaries presented in the annexes.

Sources of evidence

The evidence behind this report was gathered in all seven beneficiaries by the Hajde4EU research team: seven Country Coordinators, supported by dedicated enabling-environment and legal expertise in Serbia and Türkiye, working under the coordination of the Key Experts and the Team Leader. Regarding the primary data collection, the team ran three structured surveys of CSOs and of public institutions, added a specialised survey of expert organisations, and complemented these with key informant interviews, focus group discussions and validation meetings. In addition, a review of new legislation, strategies, policies and other official documents was conducted. Regarding secondary data collection sources, the assessment drew on a targeted review of reports by CSOs and international organisations, and of reports by similar monitoring initiatives by Civicus, RFS, ECF, FRA, etc. The data refers to 2025, or to the most recent year available where 2025 figures were not yet published. Several changes were introduced to the methodology used in previous assessments, primarily to the survey questionnaires - most notably around public institutions' approach to civil society and CSOs' participation in effective consultation processes. These changes had only a minor effect on comparability, since direct year-on-year comparability was already limited in previous editions owing to uncontrolled and unrepresentative sampling. The changes to the survey designs are explained under each relevant heading below.

Methodological instruments of the 2025 assessment	
Instrument	Role in the assessment
Desk review	Legal, policy and documentary analysis in all seven beneficiaries, drawing on national legislation and draft laws, strategies and action plans, official reports and statistics, and reports of independent institutions, international organisations and CSOs.
General CSO Survey	Structured online questionnaire; 626 responses region-wide; quantitative CSO perceptions across the indicator set
Specialised CSO Survey	Structured questionnaire circulated to expert organisations and networks; 50 substantive responses region-wide; qualitative expert input
Public Institutions Survey	Structured questionnaire for central, regional or entity-level and local institutions with experience of working with CSOs; 98 responses region-wide
Key informant interviews and focus groups	Qualitative triangulation with CSO representatives, resource centres, government interlocutors and EU Delegations and the EU Office in Kosovo*
Validation	One validation meeting or focus group per IPA beneficiary in June 2026, testing and refining preliminary findings and proposed scores

Surveys

This year's cycle uses a revised methodology and a different survey design, in particular the splitting of CSO input into a general and a specialised survey, together with a shorter and differently timed field-work period. The volume and make-up of the responses are, as a result, not the same as in previous years.

The General CSO Survey, which was publicly available and open for all CSOs ran in all seven IPA beneficiaries, with most fieldwork falling in May and June 2026. It reached respondents through the Hajde4EU e-mail database, social media platforms, the EU Delegations and the EU Office in Kosovo, the National Resource Centres and national CSO networks, and was disseminated further to grassroots and local organisations through direct invitations and one-to-one follow-up by the Coordinators for IPA beneficiaries. 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 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.

The Specialised CSO Survey was addressed to expert organisations and networks with a track record on the enabling environment and on specific thematic areas, among them human rights, gender equality and LGBTIQ+ rights, media freedom, minority rights, youth, disability rights, the rule of law and anti-corruption. 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 responses 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. It offers 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.

General CSO Survey

Numerous improvements were made on the General CSO survey in 2025. In the 2024 questionnaire, there were 95 questions, many of which were chains of separate yes/no questions followed by “how many times” follow-ups. In 2025, the total question count has been reduced to 37, largely by converting those repetitive question chains into matrix/table formats. In addition, several other changes were made on the questionnaire as summarised below and detailed further under relevant indicators:

- ➔ The “I don’t know” option was removed from the multiple-choice lists, related to indicators 1.2.c, 1.6.b, 1.7.e, 1.10.c, 1.10.d, 2.3.d, 2.2.a, 3.1.a, 3.1.b, 3.5.a; not affecting comparability.
- ➔ The “public officials” terminology was changed to “public institutions”, and a “neutral” option has been added to the scaled answer options, related to indicator 2.2.a; with minor effect on comparability.
- ➔ The two effectiveness criteria for the consultation/participation related question (a minimum 15-day comment period and access to drafts throughout the process) were presented separately for each consultation channel, having a considerable effect on indicators 2.1.a and 2.3.a; making it possible to assess effectiveness.
- ➔ Stakeholder consultation and partnership questions were merged, asking whether consultation or partnership modes were used with each stakeholder, distinguishing types of engagement, with expanded effects in assessing indicators 3.5.b, 3.6.a and 3.6.b.

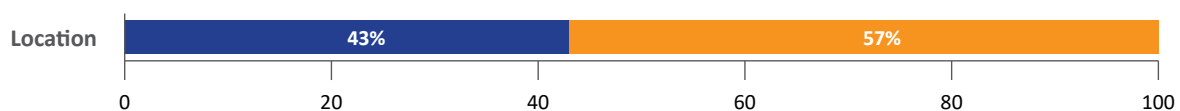
In total, the General CSO Survey was shared with 6735 contacts across 7 IPA beneficiaries directly by Hajde4EU team; furthermore, the NRCs and EUDs in all beneficiaries circulated the survey to their databases; hence it arrived in mailboxes of at least 15000 CSOs. The survey drew 626 responses across the seven beneficiaries, distributed as set out below. As can be seen in the table below, the number of responses were considerably less than 2024 and 2023, due to numerous factors including the limited time frame for collection, the public holidays in several beneficiaries, and similar surveys being circulated by other institutions during the same period. As in earlier cycles, these responses cannot be assumed to mirror the underlying CSO population in each IPA beneficiary, so the results are best read

as indicative of the organisations that took part rather than as representative of the region as a whole. 615 responses out of 626 were considered as valid and used for respondent-level aggregation.

# of responses and share in total responses, per IPA beneficiary								
	2025		2024		2023		2021	
Albania	70	11,2%	114	10%	107	12%	80	12%
Bosnia and Herzegovina	43	6,9%	120	10%	116	13%	89	13%
Kosovo	44	7,0%	116	10%	105	12%	70	10%
Montenegro	93	14,9%	130	11%	122	13%	106	16%
Republic of North Macedonia	61	9,7%	201	17%	141	15%	80	12%
Serbia	104	16,6%	147	12%	175	19%	91	13%
Türkiye	211	33,7%	364	30%	142	16%	165	24%
Total	626	100%	1,192	100%	908	100%	681	100%

Türkiye contributed by far the largest share of responses and Bosnia and Herzegovina and Kosovo the smallest. Responding CSOs showed a balance between capital/metropolitan cities and others, as shown on the following graphic.

● Capital / main metro centre ● Other cities



The highest percentages of CSOs from capital cities were recorded in Albania (67% from Tirana) and Montenegro (65% from Podgorica), while the highest percentages of responses from smaller cities were seen in Serbia (69%) and the Republic of North Macedonia (61%). Nearly half of the CSOs' (46%) scope of work was at national level, 21% at local level, 17% at regional/sub-national/entity level, and 16% at international level.

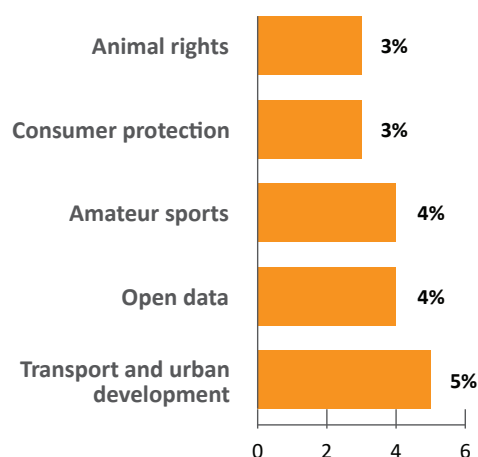
Vast majority of responding CSOs (79%) were registered associations, as in previous years. 8% were foundations, 2% vocational/professional organisations/unions, and unregistered platforms/networks, not-for-profit companies, and not-for-profit cooperatives having 1% each.

Thematic Fields Covered by Responding CSOs

Most Common Thematic Fields



Least Common Thematic Fields



Note: fields are not mutually exclusive (CSOs could select multiple thematic areas), so percentages do not sum to 100%. “Most common” combines the five highest-ranked fields with two further fields tied at the 5th-highest share, as reported in the underlying text.

The graphic above shows the top and lowest five thematic fields of responding CSOs, where the highest responses were human rights (43%) and the lowest were consumer protection (3%) and animal rights (3%).

With regard to the gender of responding individuals, women/females were in majority with 57%; 41% of respondents identified themselves as man/male, 2% as non-binary, and 2% did not want to disclose their gender identity.

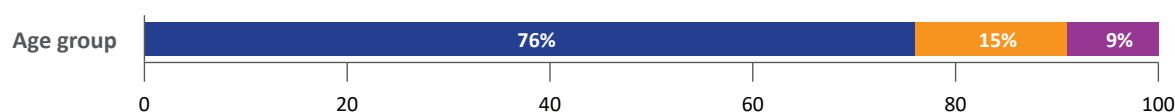
● Woman / female ● Man / male ● Non-binary ● Prefer not to disclose



Woman/female respondents were highest in Albania (67%), and lowest in Bosnia and Herzegovina (43%). Respondents who identified themselves as non-binary were recorded only in Serbia (1%) and Türkiye (2%).

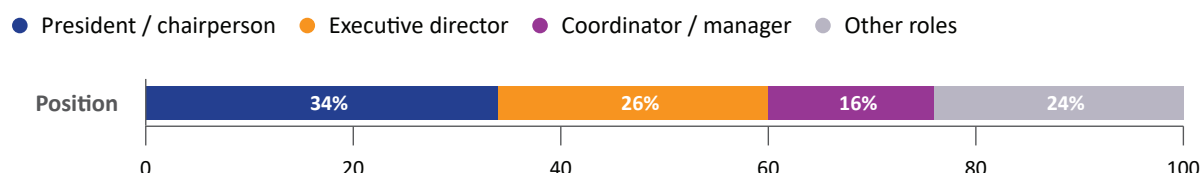
As can be seen in the graphic below, 76% of CSO representatives was between 36-65 years old; 15% between 18 and 35, and another 9% was 66+.

● 36–65 ● 18–35 ● 66+



The highest percentage of young respondents was recorded in Montenegro (28%), and the lowest in Serbia with 4%. The highest percentage of the older generation (66+) was seen in Bosnia and Herzegovina with 16%.

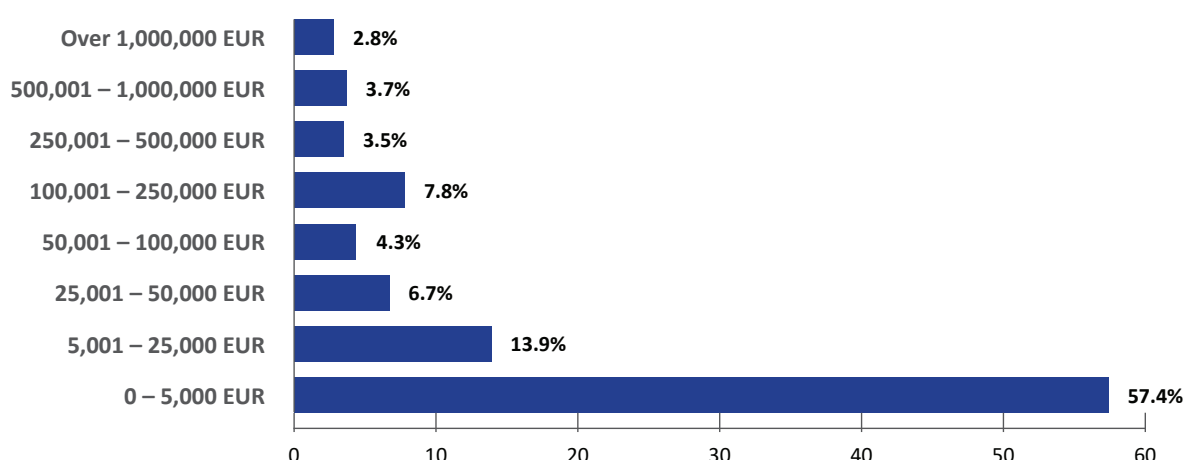
The majority of the respondents held senior governing and/or managerial positions, as presented below.



This is relevant to interpretation: the survey reflects, to a significant degree, the perspective of those who direct and represent CSOs rather than that of more junior staff or volunteers, and its findings should be read with that probable skew in mind.

As shown in the graphic below, across the seven IPA beneficiaries surveyed, responding CSOs' annual budgets in 2025 were heavily skewed towards the lower end: 57.4% of responding organisations reported an annual budget of EUR 5,000 or less, and a further 13.9% fell between EUR 5,001 and EUR 25,000, meaning over 70% of surveyed CSOs operated on less than EUR 25,000 per year.

Reported 2025 CSO Annual Budget (EUR)



By contrast, only 2.8% reported budgets exceeding 1 million EUR. This pronounced concentration at the small-budget end underscores the resource constraints facing the majority of the region's civil society sector, even as a small number of larger, better-resourced organisations account for a disproportionate share of overall sector funding.

Public Institutions Survey

The 2025 Public Officials Survey reorganises the questionnaire used in earlier cycles into five clearly labelled sections and adds considerably more depth on consultation and cooperation, with new questions on which mechanisms are used, whether input actually shaped final decisions, and whether institutions cooperate with CSOs on policy implementation and monitoring, not just drafting. Most rating scales were reordered to lead with the most positive option and dropped both the "I don't know" choice and the "please explain" follow-ups, while the transparency and fairness funding questions

were merged into one and replaced with two new questions on funding modalities and the public availability of funding criteria; the survey closes with a new open question on the main challenges to improving institution-CSO cooperation. These changes do not affect comparability, rather enrich the analysis.

The Public Institutions Survey drew 98 responses across the seven IPA beneficiaries, spanning central (64%), regional or entity-level (7%) and local bodies (29%). Out of the 98 responses, 94 of them were considered as valid and used for respondent level aggregation. 65% of responding public officials identified themselves as woman/female, 31% as man/male, 1% as non-binary and 4% did not want to disclose their gender identity.

As can be seen on the table below, in several beneficiaries the response numbers were low, lowest of all being in Montenegro. The survey therefore gives a sense of how officials who work with civil society see the situation, but it cannot be taken as representative of public institutions more broadly.

# of responses and share in total responses, per IPA beneficiary								
	2025		2024		2023		2021	
Albania	36	37%	13	14%	20	22%	9	12%
Bosnia and Herzegovina	8	8%	7	7%	11	12%	14	18%
Kosovo	11	11%	19	20%	13	14%	14	18%
Montenegro	3	3%	5	5%	14	15%	11	14%
Republic of North Macedonia	18	18%	19	20%	15	16%	8	12%
Serbia	15	15%	31	33%	17	18%	13	17%
Türkiye	7	7%	1	1%	3	3%	7	9%
Total	98	100%	95	100%	93	100%	76	100%

Specialised CSO Survey

The Specialised CSO Survey was a new addition to the assessment methodology that was not used in previous cycles. The survey was shared with 147 CSOs from seven IPA beneficiaries and produced 54 responses from CSOs that are specialised in civil society enabling environment and capacity building. The invited CSOs included, but were not limited to, the National Resource Centres, other specialised CSOs working on civil society capacity building and enabling environment, and big thematic networks/platforms working at national level. The count varied a good deal between IPA beneficiaries, from twelve in Montenegro and fifteen in Kosovo down to only two responses in Bosnia and Herzegovina and Serbia. Where responses were few, the instrument carried correspondingly less weight, and the analysis leaned more heavily on the desk review, the interviews and the validation feedback.

# of responses and share in total responses, per IPA beneficiary		
	2025	
Albania	8	14,8%
Bosnia and Herzegovina	2	3,7%
Kosovo	15	27,8%
Montenegro	12	22,2%
Republic of North Macedonia	6	11,1%
Serbia	2	3,7%
Türkiye	9	16,7%
Total	54	100%

Interviews, focus groups and validation

Alongside the surveys, Coordinators for IPA beneficiaries held key informant interviews and focus group discussions with a range of interlocutors: CSO representatives, National Resource Centres, government officials responsible for cooperation with civil society, and staff of the EU Delegations and the EU Office in Kosovo. Altogether, 28 interviews were held across the seven IPA beneficiaries, with 15 CSOs, 7 EUDs and 6 government offices. These conversations serve as qualitative triangulation and are not treated as statistically representative. Each IPA beneficiary's draft findings were then tested in a validation meeting or focus group in June 2026, open to civil society, public institutions and EU representatives. A total of 33 CSOs, 4 EUDs and 6 government offices were present in the eight validation focus groups held during the assessment in seven IPA beneficiaries. What emerged from these sessions fed back into the analysis, helping to clarify or reinterpret preliminary findings and, in some cases, to adjust indicator scores; the specific points raised are recorded in the reports of IPA beneficiaries.

Research constraints and comparability

The following constraints should be kept in mind.

1. Because the surveys were administered online, they reached only those CSOs and institutions with internet access and some existing connection to the channels used to distribute them.
2. Since it was not possible to make it mandatory for respondents to finish the questionnaire, the number of responses decreases towards the end of the survey. The percentages reported throughout this document are therefore calculated based on the number of respondents to each individual question, rather than the total number of survey respondents.
3. The SO3 indicators rest on CSOs' own assessments of themselves and so speak for the participating sample rather than the sector at large.
4. Where an indicator depended on public data that had not yet appeared for 2025, the most recent available figures were used in its place.

5. Scores from earlier years, including the 2021 baseline and the 2023 and 2024 assessments carried out under TACSO, appear here only as reference points, not as directly comparable figures.
6. Due to the change in survey design introduced in 2025, and the uncontrolled - and unrepresentative - sampling that has been used across all years, for indicators relying on survey responses, the narrative avoids, to the extent possible, describing movements between years as increases or declines, and any year-on-year figures are offered as context rather than as measurements of change.
7. Fieldwork for this assessment was conducted in May-June 2026, six to eighteen months after the stated 2025 reference period - a gap that widened as the effects of the withdrawal of United States assistance became more pronounced. This creates a risk that 2026 conditions, particularly regarding funding, staffing, and perceptions of public institutions, may have been inadvertently projected back onto respondents' assessment of 2025.
8. A final point of framing: this regional report is not a single consolidated analysis of the region. It sets out the most telling developments, favourable and unfavourable, in each IPA beneficiary under each Specific Objective, and is meant to be read alongside the reports of seven IPA beneficiaries, where the detailed indicator assessments and the full references to sources can be found.



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

In 2025, the **overall trend under Specific Objective 1 remained largely negative** across the IPA beneficiaries, even though core legal guarantees for association, assembly and expression formally stayed in place and a few countries recorded targeted legal or strategic improvements. The **enabling environment continued to be marked by a widening gap between law and practice**: while most countries have legislation that is moderately or mostly aligned with European and international standards, their implementation is increasingly undermined by foreign-agent narratives, pressure on rights-based CSOs and journalists, SLAPPs, restrictive policing of protests and weak incentives for sustainable funding, taxation and volunteering. Serbia and Türkiye again stood out as the most repressive and hostile environments, while Kosovo, Montenegro and the Republic of North Macedonia maintained relatively favourable legal frameworks but struggled with enforcement and protection gaps.

Freedoms of association, assembly and expression

Legal frameworks for freedom of association, peaceful assembly and expression remained largely stable in 2025, with associations generally able to register without discrimination and face termination only by court decision. Practical obstacles included slow court-based registration, non-operational electronic registers, outdated assembly laws that leave spontaneous and online assemblies unprotected, and reliance on slow higher-court review against abusive prohibitions.

The most notable **legislative developments of 2025 brought both opportunities and new risks**. In Albania, a new lobbying law raised concerns that an overly broad definition could impose disproportionate compliance burdens on ordinary advocacy, and partial defamation reform improved protection for some journalists while leaving insult criminalised and without anti-SLAPP safeguards; the adoption of a Gender Equality Law was preceded by disinformation and the last-minute removal of references to gender identity. In Bosnia and Herzegovina, the foreign-agent-style law adopted in Republika Srpska was struck down ab initio by the Constitutional Court in May 2025, illustrating both escalating legislative pressure on foreign-funded organisations and the continuing importance of constitutional review. In Montenegro, a draft Law on NGOs restricting founders convicted of serious offences, together with changes to access-to-information and public-gatherings legislation, prompted concern that the cumulative effect could narrow space for civil society.

Foreign-agent-style proposals and narratives remained a major driver of civic-space shrinkage, no matter if laws were repealed or not adopted, as in Bosnia and Herzegovina and Serbia. The accompanying rhetoric, police raids, financial scrutiny and smear campaigns reinforced uncertainty and stigma for foreign-funded organisations. In Türkiye, so called influence-agent concepts discussed in relation to the Penal Code, combined with frequent criminalisation of critical CSOs and media, contributed to a sense of permanent legislative threat.

Practical restrictions on peaceful assembly intensified, especially in Serbia, where hundreds of incidents of pressure on protests were documented, including surveillance, administrative hurdles and smear campaigns against student-led and opposition demonstrations. In Türkiye, repeated blanket bans, mass detentions, prosecutions of protesters and heavy use of force at labour, feminist and LGBTIQ+ events led monitors to classify civic space as under severe pressure. Elsewhere, protests and marches, including the Pride march in Sarajevo, mostly took place, although police discretion and uneven enforcement continued to pose risks.

Freedom of expression developments were mixed, with Albania recording the largest improvement in the RSF World Press Freedom Index, or in Bosnia and Herzegovina extensively applying criminal defamation in Republika Srpska where complaints rose markedly and SLAPP cases against environmental defenders persisted. Constitutional courts played a protective role in Kosovo, where problematic provisions of the media-regulation law were annulled, and in the Republic of North Macedonia, where journalists' rights in Parliament were upheld, while Montenegro adopted a new Free Access to Information law. In Serbia, freedom of expression deteriorated further through attacks, threats, SLAPPs, police raids and digital surveillance of journalists and activists; in Türkiye, anti-terror and Criminal Code provisions continued to be used against journalists and human-rights defenders, and digital censorship increased to a degree described by monitors as digital martial law.

Funding, taxation and fiscal incentives

None of the seven IPA beneficiaries introduced new legal provisions in 2025 directly prohibiting access to specific types of funding, and Albania, Kosovo, Montenegro and the Republic of North Macedonia maintained liberal frameworks for CSO income. However, the attempted foreign-agent law in Republika Srpska and heightened scrutiny of USAID-funded projects in Bosnia and Herzegovina, together with the unresolved foreign-agent bill and AML/CFT guidelines in Serbia, increased compliance burdens and produced a deterrent effect on foreign-funded organisations, so that these environments no longer fully qualify as enabling. Türkiye remained problematic due to restrictive fundraising rules, political pressure on organisations relying on foreign support and narrow access to privileged tax statuses.

Public funding to CSOs was quantitatively significant but structurally fragmented, with weak transparency and fairness. National-level allocations ranged from EUR 2 million in Albania to nearly EUR 430 million in Türkiye, yet in most countries comprehensive data on who received what, under which criteria and with what results remained unavailable, and broader budget transfers were frequently awarded without unified frameworks, consolidated databases or conflict-of-interest safeguards. **Only 21% of CSOs across the region consider public funding transparent and fair, against 84% of public institutions rating their own funding as transparent, revealing a wide perception gap.** Access is also uneven by thematic field: CSOs working on human rights, gender equality and LGBTIQ+ rights refrain from applying at above-average rates, and where they do apply, approval rates are markedly lower, falling to 25% for human-rights applications and 10% for gender equality and LGBTIQ+ applications in Türkiye.

Tax regimes provided only partial support to CSOs, while the core CSO income remained generally exempt when used for public-benefit purposes. Yet, income from economic activities continued to be taxed unless specific thresholds were met, and broader reforms on social enterprises, VAT and property-tax exemptions remained at drafting stage in several countries. In Türkiye, the regime for tax-exempt foundations tightened further, with higher asset and income thresholds and stricter conditions for retaining status. On donation incentives, Montenegro clarified and modestly expanded tax reliefs under both corporate and personal income tax laws, improving recognition of civil-society development and volunteering as public-benefit areas, while Kosovo continued to offer the most generous system with deductions of up to 10% of taxable income.

Volunteering and employment in CSOs

Albania adopted a new Law on Volunteering (Law 94/2025), recognising volunteering as work experience and compensating volunteer providers for insurance contributions, although registration burdens and unclear institutional responsibilities limit its application. Montenegro adopted a budgeted Strategy for the Development of Volunteering 2025-2029, while the contract-based model of the underlying law remains in place pending the announced new law. **Across the region, most volunteer engagement remains self-organised rather than supported by state schemes.**

Civil society remains a small employer, accounting for under 1% of total employment where data exist, with Kosovo the notable outlier at about 3.9% of the contributing workforce, down from 4.5% in 2024. No disaggregated labour-market statistics were available for Albania, Montenegro and Türkiye.

Overall, the 2025 findings under Specific Objective 1 confirm that **civic space in the Western Balkans and Türkiye remains formally protected but substantively fragile**. Most countries retain laws that meet European and international standards on paper, yet foreign-agent narratives, abusive litigation, restrictive policing and uneven protection from attacks increasingly erode these rights in practice, especially in Bosnia and Herzegovina, Serbia and Türkiye. The economic foundations of civil society show the same tension: fundraising frameworks and tax rules generally allow diverse income, but compliance burdens, opaque and fragmented public funding, weak donation incentives and underdeveloped volunteering regimes mean that CSOs operate in financially insecure conditions, with limited access to fair public support and only marginal recognition as employers.

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 imposed.

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	3	4	4	4	2	1
2024	3	3	4	4	4	2	1
2023	3	3	4	4	4	2	1
2021	3	4	4	4	4	3	1

Overall regional trend: Despite largely stable legal frameworks, civic space continued to come under pressure, with implementation gaps and restrictive practices undermining fundamental freedoms in several countries. In 2025, the legal guarantees for freedom of association, peaceful assembly and

freedom of expression formally remained in place across the IPA beneficiaries, but the practical exercise of these rights continued to be constrained, and in some cases further deteriorated. A hostile or increasingly restrictive environment for CSOs and journalists persisted in **Türkiye** and intensified in **Serbia**, where civic space was downgraded to “repressed” and rights-based organisations faced multi-layered pressure, smear campaigns and SLAPP risks. In **Bosnia and Herzegovina**, constitutional safeguards proved effective in striking down the “foreign agents”-type law in Republika Srpska, yet criminal defamation and SLAPPs against activists and media continued to undermine free expression and civic participation. The Republic of North Macedonia, Kosovo and Montenegro largely maintained legal frameworks that meet most European and international standards, although implementation challenges persisted. In the **Republic of North Macedonia**, increasing online hate speech, persistent SLAPP risks and a slight decline in media freedom indicators continued to affect the enabling environment, while **Kosovo** faced ongoing concerns regarding the protection of spontaneous assemblies and the functioning of media regulation, and **Montenegro** saw debate over proposed restrictions affecting CSOs and public assemblies, although these had not been adopted by the end of the year. **Albania** combined partial progress on defamation and press freedom with new constraints on digital expression and sustained disinformation targeting rights-based CSOs.

Freedom of association - establishment and registration: The legal framework for the establishment and operation of CSOs remained largely stable, despite continuing practical and administrative obstacles. In most countries, organisations can be registered without discrimination and engage in a broad range of lawful activities, while involuntary termination or prohibition generally requires a court decision rather than discretionary administrative action. At the same time, practical obstacles persisted: court-based registration procedures and non-operational electronic registers continued to create delays and costs in some contexts; fragmented rules and outdated definitions in public-assembly laws left gaps in the protection of spontaneous and digitally mediated gatherings; and safeguards against abusive terminations or prohibitions rely heavily on higher-court review, which is unevenly accessible and often slow. Taken together, these practical gaps help explain why the picture is one of broadly stable legal protection alongside an everyday experience that remains, for many organisations, far more constrained.

Legislative developments: Several legislative initiatives in 2025 introduced new opportunities but also additional risks for civic freedoms. In **Albania**, a new Lobbying Law raised concerns that an overly broad definition of lobbying could place disproportionate burdens on ordinary civil society advocacy; partial defamation reform improved protection for some journalists but left insult criminalised and failed to introduce safeguards against SLAPPs; and the adoption of the Gender Equality Law, while formally expanding equality guarantees, was preceded and accompanied by disinformation campaigns and last-minute parliamentary intervention removing gender identity terminology from the law contributed to a more challenging environment for LGBTIQ+ rights CSOs. In **Bosnia and Herzegovina**, the Republika Srpska “foreign agents”-style Law on the Special Register and Publicity of the Work of Non-Profit Organisations was adopted but subsequently declared unconstitutional and repealed by the Constitutional Court of BiH in May 2025, illustrating both escalating legislative pressure and the continued role of constitutional review in protecting freedom of association. In **Montenegro**, the Ministry introduced a Draft Law on NGOs whose proposed restrictions on founders convicted of serious offences prompted concern from CSOs about proportionality and potential impacts on freedom of association, even though the intent was framed as alignment with anti-money-laundering standards. Additional legislative changes to the Law on Access to Information and the Law on Public Gatherings also raised concerns, as CSOs feared that the revised rules could reduce transparency and make it more difficult to organise or participate in public assemblies, potentially narrowing the practical space for civic engagement.

Foreign agent legislation: Foreign agent-style initiatives and related political narratives continued to challenge civic space across the region. The later repealed and ab initio withdrawn Law on the Special

Register and Publicity of the Work of Non-Profit Organisations in Republika Srpska entity of **Bosnia and Herzegovina**, contained provisions that would require CSOs and media organisations receiving international funding to register in a special registry, with onerous reporting, and restricted “political” work. In **Serbia**, despite the non-adoption of the 2024 draft Law on a Special Register of Foreign Influence Agents, containing provisions that would oblige organisations receiving over 50% foreign funding to register as “foreign agents”, with harsh penalties for non-compliance, the issue remained a major concern in 2025 as the rhetoric about “foreign agents” and “foreign influence” continued, and was combined with law enforcement raids, financial scrutiny (by the Administration for the Prevention of Money Laundering (APML) and the Special Anti-Corruption Department of the Higher Public Prosecutor’s Office in Belgrade) and smear campaigns (driven by high-level public officials and pro-government media). In **Türkiye**, the foreign-agent-type proposal was not formally brought to the Parliament in 2025, but it remained part of a broader legislative and political narrative targeting CSOs receiving international funding. Debates continued around “influence agent” provisions, to be added to the Penal Code framed as addressing espionage or foreign interference. Although no formal foreign-agents law was in force during the reference year, this ongoing discussion, combined with an already restrictive environment for CSOs, journalists and the independent media, added to uncertainty and concerns.

Freedom of peaceful assembly - regional trend: Legal guarantees for peaceful assembly remained largely unchanged, while practical restrictions persisted. The effective exercise of freedom of peaceful assembly remained a challenge across the region, in particular for defenders of environmental and LGBTIQ+ rights, as well as other rights-based and watchdog groups who faced restrictions, pressure or disproportionate policing during protests and public gatherings. In some countries, assemblies were generally allowed but framed by fragmented or outdated legal rules and occasional problematic police responses, while in others, broad bans, restrictive proposals or hostile rhetoric created a more difficult environment for organising and attending public events. These patterns point to a growing gap between formal legal protections and their day-to-day implementation on the ground.

Most countries maintained generally favourable legal frameworks for peaceful assembly, despite implementation challenges. For **Albania**, **Montenegro** and the **Republic of North Macedonia**, the legal frameworks governing freedom of peaceful assembly did not change in 2025 and formally continued to protect the right to organise and participate in public gatherings. In these three countries, no systemic new bans or widespread unlawful prohibitions on assemblies were reported during the reference period, and protests and public events generally took place within the existing legal rules. In **Montenegro**, amendments to the Law on Public Gathering and Public Events that would restrict gatherings on highways, main and regional roads and border crossings were proposed but not adopted in 2025; in the **Republic of North Macedonia**, unresolved issues remained around the prior-notification requirement for assemblies organised by non-citizens and the minimum threshold required for a gathering to qualify as a public assembly. In **Bosnia and Herzegovina** and **Kosovo**, freedom of peaceful assembly in 2025 was broadly maintained within existing legal frameworks, with a few specific incidents or concerns reported. In **Bosnia and Herzegovina**, public gatherings and protests, including the BiH Pride March in Sarajevo, generally took place without major interference, although the assembly framework remains fragmented across entities and cantons and the law in Republika Srpska is still criticised as restrictive. In **Kosovo**, the Law on Public Gatherings remained unchanged and largely aligned with European and international standards; assemblies were mostly allowed, with one notable case in April 2025 where 12 protesters against electricity price increases were arrested and later released, highlighting ongoing issues around police discretion rather than a systemic restriction on protest rights.

Serbia and Türkiye continued to present the most restrictive environments for peaceful assembly. In **Serbia**, the formal legal framework continues to guarantee freedom of peaceful assembly, but practice deteriorated sharply in 2025. Civil society monitoring recorded hundreds of incidents involving restrictions on protests, police interventions and pressure on organisers - from the banning of the Pride Caravan, to dozens of arrests of environmental and anti-corruption activists - with large student-led

demonstrations in Belgrade, expanding into a broader citizen movement, facing particularly heavy surveillance, administrative hurdles and smear campaigns. Combined with intensified rhetoric portraying critical CSOs and protesters as “foreign agents” or destabilising actors, these developments made it increasingly harder for people and organisations to gather without fearing consequences. In **Türkiye**, peaceful assembly remained heavily constrained in practice despite constitutional guarantees. 2025 saw repeated blanket bans on demonstrations in major cities, large-scale detentions and prosecutions of protesters, and frequent police use of force against a wide range of gatherings, including the protests following the March 2025 detention of Istanbul Metropolitan Mayor Ekrem İmamoğlu, 1st of May marches, feminist and LGBTIQ+ events and Pride marches. These patterns, together with ongoing criminalisation and administrative obstruction of assemblies, led international monitors to classify Türkiye’s civic space as “under severe pressure”, indicating that the rights to peaceful assembly, expression and association are seriously restricted.

Freedom of expression - regional trend: Freedom of expression remained under pressure, driven by legal, political and practical constraints. With a mix of legal restrictions, SLAPP cases, unsafe working conditions for journalists, digital censorship and weak implementation of access-to-information guarantees, freedom of expression remained problematic. **Albania** made the biggest jump in the RSF World Press Freedom Index in the region, moving from 99th to 80th place, reflecting steps towards defamation reform and some journalist safety measures. At the same time, insult remained criminalised, no specific SLAPP safeguards were introduced, and the government’s TikTok ban, which was adopted without parliamentary scrutiny or a proportionality assessment, was challenged before the Constitutional Court as a significant restriction on online freedom of expression. Rights-based and media-freedom CSOs continued to face disinformation campaigns and delegitimising attacks. In **Bosnia and Herzegovina**, freedom of expression remained under strain, particularly in Republika Srpska, where criminal defamation continued to be applied extensively and the number of complaints rose markedly, reinforcing pressure on journalists and activists. SLAPP cases against environmental defenders persisted and an anti-SLAPP draft law in FBiH was not adopted, leaving civic actors exposed to abusive litigation. On the positive side, international ratings showed a slight improvement in overall freedom of expression scores, indicating that judicial safeguards still provide some protection even as practice remains problematic.

Kosovo, Montenegro and the Republic of North Macedonia maintained legal frameworks aligned with European and international standards. Overall, the legal frameworks in Kosovo, Montenegro and the Republic of North Macedonia for freedom of expression, largely or fully met European and international standards, 2025 saw some additional improvements and also several challenges. In **Kosovo**, implementation challenges persisted. The Constitutional Court’s annulment of the Law on the Independent Media Commission was a positive step for media freedom, even though the regulator remained without a quorum and media regulation needs revisiting. Kosovo saw some improvement in global press-freedom rankings, yet continued to struggle with political pressure on media, SLAPP risks, attacks and threats against journalists, and gaps in data collection on SLAPP cases. In **Montenegro**, freedom of expression formally continued to be protected, with censorship prohibited and defamation decriminalised. The new Law on Free Access to Information, introduced improvements on proactive transparency and open data, representing a step forward for access to information, though CSOs challenged specific provisions before the Constitutional Court and warned that practical effectiveness may be limited. At the same time, concerns about media regulatory bodies’ independence, delayed appointments of CSO representatives to councils, and contested amendments affecting public broadcaster and AVMS regulator highlighted ongoing risks to media pluralism. In the **Republic of North Macedonia**, the implementation of the SLAPP-related safeguards (introduced in 2022) in courts remains weak and further training for judges is needed. In 2025, the Constitutional Court issued two important decisions affirming journalists’ rights to report from Parliament and criticising the state’s failure to protect them during the 2017 Assembly events, thereby strengthening case-law on freedom of expression and clarifying positive obligations towards media professionals. On a contrary note, the

defamation case brought by a former Deputy Prime Minister against the Investigative Reporting Lab was described by media freedom organisations as a worrying SLAPP. Structural issues such as slow application of anti-SLAPP safeguards and administrative obstacles for rights-based CSOs persist and the Republic of North Macedonia fell six places in RSF's 2025 World Press Freedom Index (from 36th to 42nd).

Freedom of expression deteriorated further in Serbia and Türkiye, narrowing civic space. In Serbia, freedom of expression deteriorated further in 2025. The legislative framework still allows forms of state-linked media ownership and influence that hinder genuine independence and pluralism. Civil society monitoring documented a high number of attacks, threats and pressures against journalists and activists, including SLAPP lawsuits, police raids and digital surveillance. Rhetoric portraying critical voices as “foreign agents” or destabilising actors, combined with the unresolved draft “foreign agents” law, contributed to an increasingly difficult environment for watchdog journalism. At the same time, EU and international monitoring processes kept pressure on Serbia to align media regulation with European standards. Freedom of expression in Türkiye remained severely restricted. Broadly worded anti-terrorism and Criminal Code provisions continued to be used against journalists, human rights defenders and activists, leading to criminal investigations, prosecutions, detentions and other judicial pressure; RSF World Press Freedom Index placed Türkiye near the bottom globally, in the “very serious” category, and domestic monitoring recorded numerous violations and dozens of journalists in prison or under strict judicial control. Digital censorship expanded, with systematic blocking and removal of online content, intentional slowing down of internet services (bandwidth throttling) and non-implementation of Constitutional Court rulings, described by the Freedom of Expression Association of Türkiye as amounting to “digital martial law”. Numerous European Court of Human Rights (ECtHR) decisions regarding violations of freedom of expression were not addressed.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	4	4	3	4	2	2
2024	3	4	4	4	4	3	2
2023	3	4	4	4	4	3	2
2021	3	4	3	4	4	3	2

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 offline;
- ➔ 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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	2	4	3	4	2	1
2024	4	2	4	4	4	3	1
2023	5	2	4	4	4	3	1
2021	5	3	4	4	4	3	1

Indicator 1.2.c: Proportion of CSOs that operate effectively without threats, attacks, judicial harassment and discriminatory treatment, 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, subjected to inspections;
- ➔ number of instances of interference with the communications of CSOs

CSOs generally have access to legal remedies to challenge decisions affecting their rights, although important gaps remain in their accessibility and effectiveness. Across the Western Balkans and Türkiye, CSOs do not have special remedies distinct from those available to other legal entities but can generally rely on a combination of administrative review, judicial proceedings and independent oversight bodies. Administrative appeals against registration, licensing or assembly-related decisions are usually available, followed by judicial review before administrative or ordinary courts, and in many countries constitutional courts and ombudsperson institutions can be seized when fundamental rights are at stake. At the same time, structural gaps persist in some contexts, certain decisions, such as the termination of association enrolment procedures, lack a clear remedy; courts are not bound by deadlines in assembly-ban cases, making relief largely post hoc; and most legal systems have yet to introduce early-dismissal mechanisms or anti-SLAPP safeguards, leaving CSOs exposed to abusive litigation aimed at discouraging public participation.

In **Bosnia and Herzegovina**, CSOs and media outlets successfully used constitutional review to contest the Republika Srpska “foreign agents” law, which the Constitutional Court of BiH declared unconstitutional and repealed in 2025. This case illustrates that, despite broader concerns about judicial independence and delays, constitutional remedies can still provide effective protection against legislation

that would have severely restricted association and participation for organisations receiving foreign funding. In **Serbia**, by contrast, access to effective remedies deteriorated. CSOs do not benefit from specialised remedies beyond those available to other legal entities, certain administrative decisions, such as the termination of association enrolment procedures, lack a clear avenue of appeal, and courts are not bound by deadlines in cases challenging bans on public assemblies, making relief largely post hoc. At the same time, the absence of early-dismissal mechanisms or alignment with the EU Anti-SLAPP Directive leaves organisations exposed to abusive lawsuits, and CSOs increasingly resorted to the European Court of Human Rights, including to obtain interim measures against the use of sonic devices during mass protests, highlighting the limits of domestic protection. In **Türkiye**, CSOs, journalists and activists continued to rely heavily on high-court remedies in an otherwise restrictive environment. The Constitutional Court and the Council of State issued a number of decisions finding violations of freedom of expression, assembly and association - including the annulment of regulations allowing associations to be classified into “risk categories” for inspection - demonstrating that legal remedies formally exist and can address some abuses. However, persistent problems with the implementation of these rulings, combined with the non-execution of multiple European Court of Human Rights judgments, mean that the practical effectiveness of these remedies remains limited and uneven across different types of rights violations.

In **Albania**, CSOs and individuals can challenge restrictive measures before ordinary courts, the Constitutional Court and equality bodies, and several high-profile constitutional decisions in 2025 - including the annulment of the nationwide TikTok ban - showed that higher courts can provide meaningful redress, even though collective actions remain constrained by the lack of a class-action mechanism. In **Kosovo**, the Constitutional Court annulled the 2024 Law on the Independent Media Commission on grounds of independence and legal certainty, and the Kosovo Judicial Council identified SLAPPs as a strategic priority for civil cases, signalling the availability of institutional channels to address some media-related and participation-related harms even though data collection and case-law on SLAPPs are still underdeveloped. In **Montenegro**, CSOs used judicial review to challenge provisions of the new Law on Free Access to Information before the Constitutional Court, seeking to prevent rules that could chill access to public information, while continued engagement with ombudsmen and media regulators provided additional, if sometimes limited, avenues to contest rights-impacting decisions. In the **Republic of North Macedonia**, two key Constitutional Court rulings in 2025 strengthened journalists’ rights to report from Parliament and clarified the state’s positive obligations to protect them during major political events, illustrating that media professionals and CSOs can obtain remedies when authorities fail to safeguard freedom of expression, even though ordinary courts still need better guidance and training to apply existing safeguards against SLAPPs consistently.

In 2025, the share of CSOs reporting that government authorities took decisions negatively affecting their ability to exercise their rights increased to 21% at the regional level, up from 17% in 2023-2024 and 20% in 2021. The IPA beneficiary with the highest rate of negative decisions in 2025 was **Serbia**, where almost half of surveyed CSOs (49%) reported such cases, followed by **Montenegro** (27%), **Bosnia and Herzegovina** (24%), and **Türkiye** (21%). While the **Republic of North Macedonia** (7%), **Albania** and **Kosovo** (both at 9%) recorded the lowest shares, with only a small minority of organisations reporting that government decisions had a negative impact on their rights.

Proportion of CSOs against whom government authorities took decisions which negatively impacted their ability to exercise rights (weighted across all respondents)

2025	21%
2024	17%
2023	17%
2021	20%

When the ability of CSOs to challenge or seek review of decisions affecting the exercise of their rights was concerned, the situation further deteriorated in 2025. From among the CSOs that faced government decisions negatively affecting their rights, only 10% of them filed official complaints. 14% of the survey respondents, compared to 10% in 2024 were not able to challenge and seek review of these decisions via official complaint mechanisms.

Proportion of CSOs unable to challenge or seek review of decisions affecting the exercise of their rights (weighted across all respondents)

2025	14%
2024	10%
2023	9%
2021	12%

Among the CSOs reporting to experience government decisions negatively affecting their rights, the highest proportion of those who were unable to challenge such decisions was in Türkiye with 81%, followed by Serbia (62%) and Montenegro (45%). The lowest percentage was recorded in Kosovo, where all CSOs faced with such negative situations were able to file official complaints.

Legal protection against threats, attacks, judicial harassment and discriminatory treatment remained limited across the region, with civic actors relying largely on general legal provisions rather than dedicated safeguards. The operational environment became more hostile in several countries, with increased smear campaigns, SLAPP-type lawsuits, intimidation and pressure especially against organisations working on human rights, gender equality, LGBTIQ+ rights, environmental protection and media freedom.

In **Albania**, legal protection still relies on general Criminal and Civil Code provisions, with no specific framework for CSOs, and criminal defamation remained in force throughout 2025; however, in practice, the climate deteriorated: watchdog, rights-based and gender/LGBTIQ+ organisations faced smear campaigns, online targeting and SLAPP-like pressure, including the hydropower-related Zall-Gjoçaj case and defamation suits against community activists. CSOs in **Bosnia and Herzegovina** remain protected only through general criminal, civil, administrative and anti-discrimination laws; there are no specific mechanisms tailored to CSO, activist or journalist risks. In Republika Srpska, restrictive initiatives (foreign-agent law, criminal defamation, removal of “gender identity” from hate-crime provisions) and criminal-law pressure, including proceedings against investigative journalists, produced a strong chilling effect on environmental and LGBTIQ+ defenders and other sensitive-issue activists, despite some constitutional review successes. In **Kosovo**, the Law on Freedom of Association explicitly obliges public

institutions to avoid discrimination against NGOs and protects them from third-party interference, with restrictions only by court decision and in line with constitutional order and public safety. However, there are still no specific anti-SLAPP or targeted protection mechanisms, but the Kosovo Judicial Council has recognised SLAPPs as a strategic priority in its 2026-2028 access-to-justice plan, which is a modest step towards addressing judicial harassment.

Montenegro's scores were decreased due to converging qualitative evidence, including the Constitutional Court crisis, the rise in attacks on activists, journalists and their families, the draft Foreign Agents and National Security Agency laws, stigmatising rhetoric from public officials; pointing to a genuine deterioration in the operating environment for civil society. This is corroborated by the sharp 14-percentage-point rise in CSOs reporting that their organisation or its members were subject to threats, physical attacks, property damage, unlawful searches or interference with communications (from 17% to 31%). CSOs in the **Republic of North Macedonia** are covered by general anti-discrimination and criminal law, with no definition of threats or attacks specifically against CSOs, and they are treated like other legal entities. However, in practice, court cases involving past attacks on organisations progress slowly, and while safeguards against SLAPPs exist in law, implementation remains inconsistent and does not systematically protect civic actors from smear campaigns and online threats.

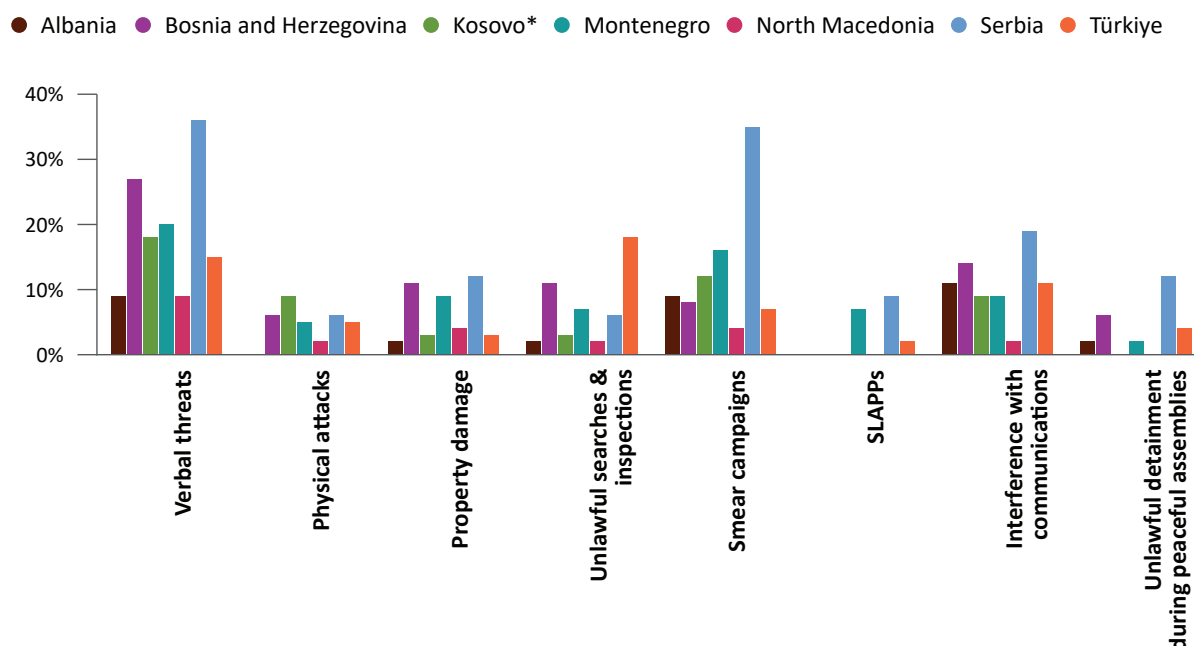
Serbia's legal framework still lacks specific protection for CSOs; there is no anti-SLAPP regime, and laws do not provide dedicated safeguards against arbitrary arrest, interference with communications, or discriminatory treatment of CSOs. The situation deteriorated significantly in 2025: police raids on CSO offices, expulsions and bans targeting foreign civic activists, reported use of spyware, smear campaigns by high-level officials, and physical and digital attacks on local movements and civic spaces created a climate in which critical association has become increasingly risky and insecure. In **Türkiye**, no legal reforms were introduced to strengthen CSO protection; existing criminal provisions offer only indirect and limited safeguards and do not specifically protect associations and foundations from interference or discriminatory treatment related to their civic activities. CSOs, especially those working on gender equality and LGBTIQ+ rights, faced intense defamation campaigns, repeated and abusive audits and inspections framed as anti-terrorism or anti-money-laundering measures, closure cases, and heavy-handed policing of peaceful assemblies, with at least hundreds of defenders documented as experiencing pressure, obstruction or harassment.

Threats, attacks and judicial harassment against CSOs increased across the region, pointing to a further deterioration in the practical protection of civic actors. Across the region, while the percentage of CSOs responding to the 2025 survey reported being able to operate effectively without threats, attacks and judicial harassment was slightly lower than 2024 (73% vs. 75% in 2024), the proportion of CSOs reported facing threats, attacks and judicial harassment increased to 27%. This marks an increase of 9% since 2024, and 11% from the baseline value.

Being able to operate effectively without threats, attacks and judicial harassment		
	% of CSOs operating without threats, attacks and judicial harassment	% of CSOs being subject to threats, attacks and judicial harassment
2025	73%	27%
2024	78%	16%
2023	74%	18%
2021	76%	16%

In 2025, the highest rate of CSOs reporting that they or their members were subjected to threats, attacks or judicial harassment was recorded in **Serbia**, where 46% of respondents reported such incidents, followed by **Türkiye** with 35% and **Montenegro** with 31%. By contrast, the lowest rates were reported in the **Republic of North Macedonia**, where 11% of CSOs indicated such experiences. **Albania**, **Kosovo** and **Bosnia and Herzegovina** reported intermediate levels, with 20%, 21% and 22% of CSOs respectively affected.

Proportion of CSOs facing threats and attacks



Across the region in 2025, CSOs reported a broad spectrum of threats and pressure, with some forms of harassment clearly more widespread than others. The most common problem was verbal threats against organisations or their members: 19% of CSOs indicated that they had experienced this type of intimidation. Smear campaigns were the second most frequent, with 13% of organisations reporting that they had been targeted by defamatory or stigmatising narratives. Interference with communications was reported by 11% of CSOs, suggesting that digital and informational pressure is becoming a significant feature of the environment. More physically intrusive forms of pressure were less frequent but still notable. Unlawful searches or inspections affected 7% of respondents, while property damage was reported by 6%. Physical attacks directed at organisations or their members were recorded by 5% of CSOs, and unlawful detainment during peaceful assemblies by 4%, indicating that a non-negligible share of organisations face direct coercion when exercising their rights. SLAPPs appeared as the least frequently reported category, but still affected 3% of CSOs, meaning that strategic lawsuits are already part of the threat landscape even if their prevalence is lower than other forms of harassment.

Beyond these numbers, in **Albania**, watchdog and rights-based CSOs, including CSOs working on gender equality and LGBTIQ+ rights, faced delegitimising narratives, online targeting and SLAPP-like defamation lawsuits such as those linked to the Zall-Gjoçaj hydropower case, while disinformation around the Gender Equality Law debate further restricted participation. In **Bosnia and Herzegovina**, particularly in Republika Srpska, criminal-law provisions and smear campaigns continued to be used against environmental and LGBTIQ+ rights defenders and independent journalists, with detentions and house searches in sensitive cases illustrating how criminal proceedings can function as a means of pressure. In **Montenegro**, rising numbers of attacks on journalists (especially women journalists) together with

stigmatising rhetoric against activists pointed to a deteriorating safety environment despite some emerging protection initiatives. In **Serbia**, police raids on CSO offices, expulsions and entry bans targeting foreign civic activists, reports of spyware use against human rights defenders, and physical and digital attacks on local movements and civic spaces created a climate in which critical association and public participation have become increasingly insecure. In **Türkiye**, hundreds of human rights defenders, journalists and opposition figures remained in prison or under strict judicial control on broadly framed terrorism-related charges, often in defiance of international human rights judgments, while rights-based CSOs faced aggressive inspections, criminalisation under anti-terror and AML/CFT provisions, and heavy-handed policing of peaceful assemblies, reinforcing the classification of its civic space as under severe pressure.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	4	3	4	4	4	3	1
2024	4	3	4	5	4	3	1
2023	4	2	4	5	4	3	1
2021	4	2	4	5	4	3	1

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, IPA beneficiaries continued to face strong international pressure to improve their legal frameworks on combatting extremism, terrorism, money laundering and corruption, but these frameworks remained to have an uneven impact on civic space protection. Overall, most countries maintained or strengthened broadly risk-based systems that do not directly target CSOs, while a smaller group introduced or retained provisions that place disproportionate compliance burdens on organisations or leave wide discretion to authorities in the name of “risk” or “security”. Türkiye stood out as the only IPA beneficiary where counter-terrorism and AML measures still clearly fail to meet standards, embedding restrictive association and fundraising rules that unduly limit legitimate civil society activities.

Albania, Kosovo, Montenegro and the Republic of North Macedonia generally maintained legal frameworks on combating extremism, terrorism, money laundering and corruption that largely meet European and international standards and do not, in themselves, unduly restrict legitimate civil society activity. However, existing AML/CFT compliance requirements, beneficial ownership obligations and banking practices continued to create administrative burdens and legal uncertainty for CSOs, highlighting the need for more proportionate and risk-based implementation.

In **Albania**, the AML/CFT and counter-terrorism framework affecting CSOs remained broadly unchanged in 2025, with existing instructions on CSO surveillance and tax-system AML still in force. A new draft amendment to the Law on the Prevention of Money Laundering and Terrorism Financing introduced the notion of “non-profit organisations with high risk”, which raised concerns about potential disproportionate obligations for legitimate CSOs if not implemented in a genuinely risk-based way. By contrast, the 2024-2030 Intersectoral Anti-Corruption Strategy began implementation with civil society participation mechanisms that are enabling rather than restrictive. In **Kosovo**, concerns remained about the existing AML/CFT law, which designates all CSOs as reporting entities and imposes bank-style obligations and strict cash-payment limits. The amendments introduced in 2024 to remove CSOs from the list of reporting entities and reduce special obligations were still under Constitutional Court review in 2025 and had not yet fully entered into force. The 2024 Law on the Register of Beneficial Owners was followed in 2025 by draft by-laws that would include CSOs in the register, but civil society raised concerns that these drafts ignore the specific nature of non-profit entities and could allow the NGO Department to suspend organisations that fail to comply, which CSOs warned could turn a technical requirement into a potentially restrictive tool against CSOs. The AML/CFT framework was stable in 2025 in the **Republic of North Macedonia**, with 2024 amendments to the Law on Prevention of Money Laundering and Financing of Terrorism addressing technical-compliance deficiencies identified in MONEYVAL’s 2023 fifth-round Mutual Evaluation Report, including on wire transfers, beneficial ownership transparency and internal controls. However, the 2022 beneficial-owner registration regime continues to impose high late-registration fees (approximately EUR 1,050) on all entities, including CSOs, and organisations without a registered beneficial owner face serious difficulties in working with banks. While the laws themselves do not unduly restrict civil society, company-style rules still create a significant administrative burden.

In Bosnia and Herzegovina and Serbia, the legal frameworks to combat money laundering, terrorism financing and corruption were broadly aligned with European and international standards and were not used in 2025 to directly target CSOs. In Serbia, however, AML/CFT-based checks of activists, pre-investigation proceedings, police raids on CSOs following money-laundering allegations, and public AML/security narratives targeting CSOs were documented in 2025, even where formal prosecutions remained few. Implementation in both countries also continued to create a compliance-heavy environment, increasing administrative burdens and, in Serbia, contributing to growing de-risking practices by financial institutions. In **Bosnia and Herzegovina**, AML/CFT laws and measures did not unduly restrict the legitimate activities of CSOs in 2025. However, the situation did not substantially change in practice compared with 2024. While the legal and policy direction is positive, the full operationalisation of the risk-based approach towards the NPO/CSO sector had not yet been completed during the reference period, particularly in relation to the completion and adoption of the sectoral risk assessment and the identification of the FATF-relevant NPO subset. The actual effects of the new framework, including its implementation in practice, still need to be assessed before the score can be increased. In **Serbia**, the AML/CFT and anti-corruption framework was updated with amendments to the main law and the new secondary legislation (a Ministry of Finance Rulebook and National Bank guidelines) that specify how financial institutions must conduct risk-based assessments of clients, including NPOs. While these changes do not formally single out CSOs as high-risk or introduce explicit legal bans, they have increased compliance and documentation demands on organisations, especially smaller CSOs and those

using crowdfunding or digital assets (virtual/crypto currencies). Some banks have reportedly become more reluctant to provide services to CSOs, illustrating how a formally risk-based regime can still generate significant operational burdens and de-risking pressures for civil society.

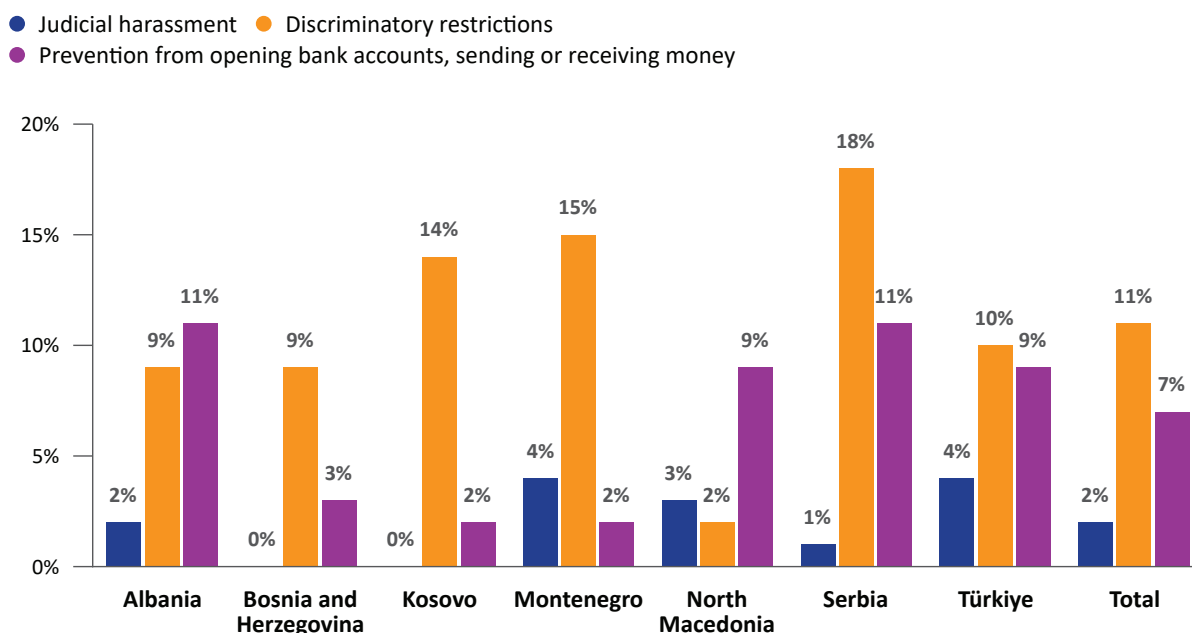
In **Türkiye**, the legal and regulatory framework used to combat terrorism, money laundering and corruption continues to fall well below standards, as Law No. 7262 and related amendments to the Law on Associations and the Law on Collection of Aid still embed restrictive association and fundraising rules that unduly limit legitimate CSO activity. The “risk-based” inspection mechanism for associations allows authorities to classify organisations as high, medium or low risk in ways that justify frequent, intrusive and often selective oversight of CSOs, including those working on human rights and minority issues under broad terrorism-related narratives. In 2025, the Council of State annulled parts of the Inspection Regulation for violating legal certainty, finding that vague and annually changeable risk-classification criteria gave public authorities excessive discretion and could lead to arbitrary inspections. However, intrusive inspection and investigation practices reportedly continued, and the underlying Law on Associations still contains an imprecise reference to “risk assessments to be carried out” that leaves a wide margin of discretion. Combined with the continued use of terrorism-related offences and financing rules to investigate and prosecute peaceful activists, journalists and human rights defenders, Türkiye remains the only IPA beneficiary in the region where counter-terrorism and AML measures structurally and systematically unduly restrict the legitimate work of CSOs.

Across the region, the share of CSOs reporting that their ability to carry out legitimate activities was *not* restricted by the implementation of laws on extremism, terrorism, money laundering and corruption showed a slight decrease from 87% in 2024 to 83% in 2025, while the proportion experiencing at least some restrictions under these laws rose sharply from 7% in 2024 to 17% in 2025.

Being able to undertake legitimate activities under laws to combat extremism, terrorism, money laundering and corruption		
	% of CSOs reporting no restrictions	% of CSOs reported facing some form of restriction
2025	83%	17%
2024	87%	7%
2023	86%	8%
2021	85%	10%

The proportion of CSOs reporting some sort of restriction was highest in **Serbia** with 24%, followed by **Kosovo**, **Montenegro** and **Türkiye** (all 18%). **Albania** recorded 14% and the **Republic of North Macedonia** 13%, while **Bosnia and Herzegovina** was the lowest with 11%. In all countries, this proportion increased compared to 2024. The highest increase was seen in **Serbia** with +15%, followed by **Montenegro** (+13%), **Türkiye** (+9%), **Bosnia and Herzegovina** (+8%), the **Republic of North Macedonia** (+6%), with the least increase seen in **Albania** and **Kosovo** (both +5%).

Proportion of CSOs reporting restrictions based on AML/CFT laws



Across the region, the highest reported restriction was discriminatory restrictions as a consequence of receiving funding from a particular source with 11%, followed by prevention from opening bank accounts, sending or receiving money (7%), while the proportion of CSOs reporting judicial harassment for alleged connections with extremism, terrorism, money laundering or corruption was 2%. In **Bosnia and Herzegovina, Kosovo, Montenegro, Serbia** and **Türkiye** the highest proportion reported discriminatory restrictions, while in **Albania** and the **Republic of North Macedonia** the most cited restriction was problems in opening bank accounts, or sending/receiving money. These restrictions became more widespread across the region in 2025. The share of CSOs reporting at least one form of restriction rose in Montenegro (from 5% to 18%, +13 percentage points), Türkiye (from 9% to 18%, +9 points), the Republic of North Macedonia (from 7% to 13%, +6 points) and Kosovo (from 13% to 18%, +5 points). The proportion of organisations facing discriminatory restrictions increased in Serbia (from 6% to 18%, +12 points), Albania (from 1% to 9%, +8 points) and Bosnia and Herzegovina (from 3% to 9%, +6 points). Problems opening bank accounts or sending and receiving money also became more common, rising in Serbia (from 1% to 11%, +10 points), Albania (from 6% to 11%, +5 points) and Bosnia and Herzegovina (from 0% to 3%, +3 points).

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

Indicator 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, all else being equal

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	5	5	5	5	3	1
2024	5	4	5	5	5	4	1
2023	5	4	5	5	5	4	1
2021	5	5	5	5	5	4	1

In 2025, across the region, in most countries the legal framework regulating the reporting and inspection requirements remained generally unchanged and in line with standards, treating CSOs and businesses equally regarding reporting requirements, inspections and sanctions.

In **Albania, Kosovo, Montenegro** and the **Republic of North Macedonia**, the 2025 legal frameworks on taxation, reporting, inspections and sanctions continued to treat CSOs broadly on an equal footing with business entities, without introducing any CSO-specific reporting or inspection regimes that would amount to discrimination. In these countries, CSO obligations are either adapted to the non-profit nature of their work (e.g. dedicated accounting standards or tailored reporting for public-benefit organisations) or mirror general company rules, so remaining challenges are mainly practical and administrative rather than rooted in laws that deliberately single out civil society for heavier control. **Bosnia and Herzegovina's** legal framework on CSO reporting, inspections and sanctions is again broadly in line with this indicator, following the Constitutional Court's repeal of the Law on the Special Register and Public Transparency of the Work of Nonprofit Organisations, with CSOs no longer subject to additional, politically framed requirements compared to other legal entities. Hence its score is reinstated as 5 - fully meets standards.

In **Serbia**, one positive development under this indicator was the amendment to the Law on Public Information and Media, which now explicitly requires that public procurements of media services be awarded on the basis of transparent, objective, proportionate and non-discriminatory criteria, with procedures and criteria published in advance, thereby formally guaranteeing equal treatment of CSO media publishers and commercial media when competing for state contracts. However, two regulatory changes in 2025 had negative implications for CSOs' reporting burden. First, the new Law on the Central Record of Beneficial Owners places CSOs and business entities under the same BO registration regime; while formally equal, this extends company-style BO obligations to associations, foundations and endowments, increasing their compliance workload. Second, new AML/CFT guidelines issued by the National Bank of Serbia require banks to conduct detailed risk assessments of non-profit organisations and to request extensive documentation on donors, funding sources, fundraising methods, activities, internal rules and controlling persons, which in practice means that CSOs must submit significantly more information to financial institutions than standard business entities typically provide, creating a heavier de facto reporting burden and contributing to more cautious or restrictive bank behaviour towards CSOs. As a result of these negative developments, Serbia's score was downgraded to 3 - moderately meets standards.

In **Türkiye**, no legislative changes were adopted in 2025 to ease CSOs' regulatory burdens, and the framework continued to clearly fail this indicator's standards. The Law on Associations remained unchanged regarding notification duties and administrative sanctions, and CSOs were still subject to disproportionate reporting obligations on foreign funding, including mandatory prior notifications before receiving funds from abroad or transferring assistance to other countries, which are not required from commercial entities in the same way. These rules impose additional administrative and compliance burdens on civil society organisations purely because of their legal form and funding sources, leaving CSOs uniquely exposed to extensive reporting and control mechanisms without any corresponding improvement in their legal status or safeguards. As a result, Türkiye remains the only IPA beneficiary in the region where public authorities formally require CSOs to submit more information than businesses and maintain a heavier inspection and sanction regime, rather than treating them equitably as legal entities engaged in legitimate, non-profit activities.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	4	5	5	5	5	2
2024	5	4	5	5	5	5	2
2023	5	4	5	5	5	5	2
2021	5	4	5	5	5	5	2

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	4	4	4	3	4	4	2
2024	4	4	4	3	4	4	2
2023	4	4	4	3	4	5	2
2021	4	4	4	3	4	5	2

Across the region, in 2025, most countries continued to allow small community organisations and civic initiatives to operate without formal registration and did not criminalise informal organising. **Albania, Kosovo, Montenegro and Serbia** retained strong or fully compliant frameworks where registration is voluntary, unregistered groups may exist and act collectively, and there are no legal provisions forcing them to register simply to organise campaigns, petitions or local actions. **Bosnia and Herzegovina** also continued to meet most standards: informal groups can operate freely, though they lack legal

personality and therefore cannot open bank accounts or contract and apply for public funds in their own name. A similar situation is in the **Republic of North Macedonia** where informal initiatives continued to operate without legal restrictions. However, they still faced limitations regarding accessing public funding and involvement in policy-making. Although this issue was discussed during the revision of the Law on Associations and Foundations, no corresponding changes have been reflected in the draft law to date. On the contrary, the Law on Prevention and Protection against Discrimination, which explicitly recognises informal groups and grants them standing to initiate *actio popularis* lawsuits in the public interest.

Türkiye remained minimally compliant as in previous years, where informal movements are not prohibited, but the narrow range of recognised non-profit forms and the link between legal personality and access to funds, aids and organisational rights means that community initiatives cannot fully exercise freedom of association without formal status.

In terms of equal participation rights for unregistered initiatives in public decision-making, legal frameworks in several countries (Albania, Bosnia and Herzegovina, Kosovo, the Republic of North Macedonia, Serbia) continued to allow informal actors to take part in consultations, hearings and other public processes on paper. **Albania's** public consultation law and online platforms in Albania and **Kosovo** provide formal venues for any citizen or initiative, and **Bosnia and Herzegovina** did not impose registration as a precondition for participation; however, all three continued to show persistent implementation gaps, with practical barriers such as weaker municipal-level consultations, low inclusion of unregistered actors in formal working groups, and privileged access for larger, registered organisations. In the **Republic of North Macedonia**, the Code of Good Practices for Civic Participation continued to guide the inclusion of all organisations including smaller community organisations and informal initiatives in decision-making, but because it is non-binding and applied at the discretion of public authorities, their effective participation still depends heavily on institutional goodwill rather than enforceable legal guarantees. **Serbia** kept a “meets most standards” score in law, with no formal registration requirement for participation, but continued longevity requirements for membership in state drafting bodies, especially in environmental legislation, and structural advantages for older, Belgrade-based organisations significantly limited effective access for newer and grassroots initiatives.

In Montenegro, there has been no formal change to the participation rights of unregistered organisations. However, as also confirmed by the 2025 survey data, participation in key policy-making channels, particularly ministerial working groups and structured consultations remained effectively restricted to registered CSOs under the Regulation on Selection of NGO representatives, while unregistered initiatives have access only to a narrow set of general public discussions. **Türkiye** stayed at a minimal level, with no explicit ban on small initiatives participating, but central rules of procedure and the 2022 by-law on drafting legislation continued to treat civil society input as optional and do not guarantee or systematise participation by CSOs or informal groups in the law-making process.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	3	5	5	5	4	2
2024	5	3	5	5	5	5	2
2023	5	3	5	5	5	5	2
2021	5	4	5	5	5	5	2

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

In 2025, relevant laws in most IPA beneficiaries continued to allow CSOs to seek and receive funding from a broad range of domestic and foreign sources without formal bans or foreign-agent-style authorisation requirements, and there were no new legal provisions that directly prohibited access to specific types of funding. Albania, Kosovo, Montenegro, and the Republic of North Macedonia maintained largely liberal legal frameworks for CSO income. Although there was a political attempt in Bosnia and Herzegovina to restrict access to foreign funding, the Constitutional Court's decision in favour of CSOs prevented such restrictions from taking effect. In Serbia, CSOs are still legally free to receive a broad range of domestic and foreign funding, but the pending foreign-agents bill and AML/CFT guidelines increased compliance burdens and scrutiny on smaller organisations, the overall environment no longer fully qualifies as enabling, and has a chilling effect on CSOs and their ability to seek diverse sources of funding. Türkiye remained more problematic due to political pressure and restrictive fundraising rules that affect organisations receiving foreign funding or relying on public collection of aid.

Albania, Kosovo, Montenegro and the Republic of North Macedonia continued to maintain legal frameworks in 2025 that broadly allow CSOs to seek and receive funding from a wide range of domestic and foreign sources without formal donor-type bans or foreign-agent authorisation requirements. In **Albania**, no legal changes restricted CSO income; organisations remained free to receive domestic and foreign grants, donations and income from economic activity, with the newly drafted lobbying law noted only as a potential future administrative burden, not a current legal limitation on funding. **Kosovo's** Law on Freedom of Association in NGOs still provided access to a broad range of income sources (domestic, foreign and international), and 2025 brought no new legal limits beyond existing AML cash-transaction caps, which apply neutrally across entities and do not target CSOs or foreign funding specifically. In **Montenegro**, the legal framework continued to allow access to all donor types and origins; 2025 AML/CFT amendments introduced a EUR 10,000 cash limit for all legal entities, but similar to Kosovo, this is a general anti-money-laundering measure rather than a CSO-specific funding restriction. CSOs in the **Republic of North Macedonia** continued to legally obtain funds from a diverse

mix of membership fees, donations, profit-generating activities and public budgets, with AML recommendations mainly increasing documentation requirements rather than prohibiting particular funding sources.

In **Bosnia and Herzegovina**, applicable laws at state, entity and Brčko District level continued to allow CSOs to receive cash and in-kind donations from domestic and foreign sources, including public funds, institutional and corporate donors, individual donors, foreign governments and multilateral agencies, with no new legal bans or authorisation requirements introduced in 2025. However, the attempted foreign-agents law in Republika Srpska, later annulled by the Constitutional Court, combined with public announcements of checks into USAID-funded projects maintained a climate of uncertainty and political pressure around foreign-funded organisations, creating a chilling effect without amounting to a formal legal restriction on fundraising.

In **Serbia**, CSOs remained legally able to receive funding from a wide range of domestic and foreign sources, and no law was adopted in 2025 that directly bans specific types of donors or grants. At the same time, the pending foreign-agents bill and new AML/CFT guidelines that label typical grassroots fundraising methods (such as crowdfunding, virtual currencies and cash donations) as high-risk have increased the compliance burden and scrutiny on smaller, community-based organisations, so the environment no longer fully meets the standards of an enabling framework. In **Türkiye**, CSOs continued to be able to formally receive domestic and foreign donations, but fundraising and foreign funding were still subject to heavy permit and notification requirements under the Law on Collection of Aid and the Law on Associations, with broad administrative discretion and only a narrow, non-transparent “public benefit” exception. This makes the legal framework for soliciting and receiving funding structurally restrictive and keeps Türkiye clearly below the standards of an enabling environment for CSO financing.

As in the previous years, CSOs participating in the survey confirmed that they were generally free to raise funds without restrictions: 92% of respondents indicated that they were able to access any type of funding without undue government interference. However, the proportion of CSOs reporting to have such interferences considerably increased by 5%.

Being able to access a broad range of funding without undue government interference		
	% of CSOs reported having no interference	% of CSOs reported facing some form of interference
2025	92%	8%
2024	91%	3%
2023	91%	4%
2021	84%	3%

The highest reporting rate on interference was recorded in **Bosnia and Herzegovina** with 14%, and the lowest proportion of CSOs facing such interference was in the **Republic of North Macedonia** with 2%. All scores and survey responses are presented in the following comparative table.

CSOs’ freedom to solicit and receive broad range of funding with/out government interference						
IPA Beneficiary	% CSOs reporting interference		% CSOs reporting no interference		Score	Explanations
	2025	2024	2025	2024		
Albania	9	N/A	91	91	5	The percentage of CSOs reporting to have no government interference stayed the same, and no legal changes happened negatively affecting the legal framework that fully meet standards
Bosnia and Herzegovina	14	0	86	N/A	3	BiH continued to only moderately meet standards with increased percentage of CSOs reporting interference and continued aftereffects of the attempted foreign-agents law
Kosovo	9	1	91	90	5	Despite some increase in the percentage of CSOs reporting interference, the rate for non-interference was also slightly increased and no changes occurred in 2025 adversely affecting the legal framework that fully meets standards
Montenegro	7	1	93	90	5	Despite an increase in interference reporting, the non-interference percentage was also higher, and with no negative legal change, Montenegro continued to fully meet standards
Republic of North Macedonia	2	0	98	92	5	The increase in the non-compliance rate was higher than interference reporting, and with no legal change negatively effecting the liberal legal environment, the Republic of North Macedonia kept its full score
Serbia	5	1	95	95	4	Although the no-interference reporting rate held steady and interference reports rose only 4%, the pending foreign-agents bill, heavier AML/CFT compliance burdens, and growing scrutiny of smaller organisations meant the environment could no longer be considered fully enabling
Türkiye	11	5	89	N/A	2	With the non-interference comparison not possible, CSOs interference reporting was increased by 6% and the structurally restrictive legal framework continued to keep Türkiye’s score at minimally meets standards

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	1	2	4	5	2	2	1
2024	1	1	4	5	2	2	1
2023	1	1	4	5	2	2	1
2021	1	1	4	5	1	2	1

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

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	4	2	4	3	2	2	1
2024	4	3	4	3	2	2	1
2023	4	3	4	3	2	2	1
2021	3	3	4	3	2	2	1

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	2	2	4	5	2	2	2
2024	2	2	4	5	2	3	2
2023	1	2	4	5	2	2	2
2021	1	2	4	5	2	2	2

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	2	1	3	2	2	1	1
2024	1	2	2	1	1	1	1
2023	1	1	2	1	1	1	1
2021	2	1	1	1	1	1	1

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

In 2025, **Montenegro** remained the only IPA beneficiary in the region with a legally guaranteed minimum level of public funding for CSOs: the Law on NGOs sets this as at least 0.3% of the annual state budget, plus dedicated percentages for programmes supporting persons with disabilities and EU co-financing. Furthermore, a draft law was proposed to increase this threshold to 0.4%.

In 2025, **Albania** still lacked any law or regulation that defines the overall level of public funding for CSOs or clearly mandates and regulates a state body to set and revise that level. Support instead continued to be channelled on a fragmented basis through multiple agencies (primarily the Agency for the Support of Civil Society (ASCS), and line ministries, each operating under its own regulatory basis, with many of these funding calls open not only to CSOs but also to other entities and individuals, and without a unified legal framework or consolidated budget overview. In **Bosnia and Herzegovina**, public funding for CSOs remained legally grounded in various budget categories and programmes at different levels of government. The system continued to be highly decentralised and fragmented, without a single, clear articulation in law of the total level of CSO funding or a unified, transparent mechanism for determining and presenting it countrywide. In **Kosovo**, the legal framework continued to treat CSO funding as a standard instrument for public-benefit programmes, with central and local institutions determining allocations annually under generic subsidies and transfers budget categories - which also cover other beneficiaries such as individuals and businesses, rather than a fixed percentage in law; the actual level of funding thus remained dependent on government priorities and available resources. In the **Republic of North Macedonia**, public funding was again regulated through the Law on Associations and Foundations, the Code of Good Practices and the new 2025-2028 civil society strategy and action

plan, which foresees reforms and an indicative increase (including a EUR 30 million envelope and a guarantee fund for co-financing), but still does not establish a comprehensive, legally guaranteed model for the level of CSO funding. In **Serbia**, the annual Law on the Budget continued to allocate resources under “grants to non-governmental organisations” across ministries and programmes, which in practice covers a broad range of beneficiaries including religious institutions, political parties and sports associations, rather than constituting a dedicated allocation for associations and foundations. No legal change in 2025 introduced a clear, predictable or systematic rule on the minimum or expected level of public funding available to CSOs, leaving the overall volume of support to be determined each year through the budget process. In **Türkiye**, the Public Financial Management and Control Law and the relevant by-law still left it entirely to individual ministries and public administrations to decide how much budget to allocate to associations and foundations, with no law specifying the level of public funding for CSOs or designating a body responsible for setting and revising that level, so support remained limited and insufficiently transparent.

In **Kosovo**, public funds allocated to CSOs were published in the Government Annual Report on Public Funding for NGOs in 2025. According to this report, the public funding provided to CSOs was shared roughly 58% from the central government and 42% from municipalities, as determined annually. Legal provisions regulating awards met most standards, with dedicated rules and an online database that was nonetheless offline from August 2025, during which beneficiary lists were published only in dispersed form across individual institutional websites, yet civil society continued to report reliability and categorisation problems in the data (under-/over-reporting, retroactive entries), meaning that the transparency and accuracy of funding records still depended heavily on continuous monitoring and improvements in practice. In **Montenegro**, both allocated and disbursed public funding to CSOs continued to be officially published, and the 2025 figures indicated strong absorption of central-level allocations even though some ministries did not use their CSO funds fully and consolidated data for local-level disbursements remained unavailable. At the same time, implementation of legal provisions was uneven, with timelines for setting priorities and launching calls often not respected. Municipal rules differed in content and did not always prescribe minimum thresholds, and there was still no comprehensive public overview of total CSO funding at the local level, limiting full transparency of the system. In the **Republic of North Macedonia**, government reports showing public funding amounts to CSOs continued to be provided. The draft 2025 report indicates about 0.49% of planned state budget income and 11.88% of CSO incomes, with 75% of funds coming from the central budget and 25% from municipalities. However, the distribution of funds remained only partially transparent: substantial amounts were still awarded without public calls, some major ministries relied on discretionary allocations, and the system for co-funding and project selection was not yet fully defined in law.

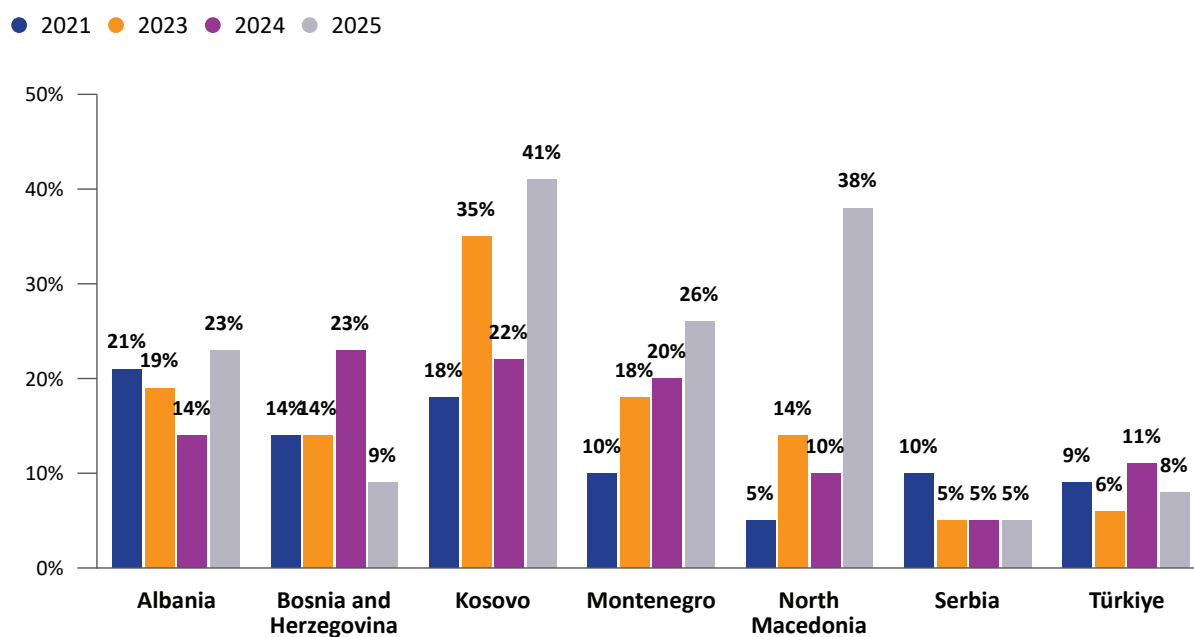
In **Albania** the main CSO grant schemes were disbursed through the Agency for the Support of Civil Society (ASCS), and the National Youth Agency, with the State Agency for Support of Start-ups also funding a narrow, eligible subset of CSOs. It was still not possible to calculate a precise percentage of the state budget going to CSOs across all public institutions. Grant procedures of ASCS met most standards (open calls, published criteria, conflict-of-interest and reporting rules), yet the absence of a unified framework meant transparency and accountability vary across institutions, and detailed data on objectives, geography and results of awards were not consistently available. In **Bosnia and Herzegovina**, there is no centralised official register of public funding awarded to CSOs, some institutions publish award information individually, but the system remains fragmented and difficult to monitor comprehensively, while independent CSO reporting indicated that around EUR 23.5 million were disbursed to CSOs. Although formal rules and guidelines continued to exist, audit reports showed that minimum standards were not frequently applied, funds were often awarded without public calls, clear and measurable criteria, documented evaluation or effective conflict-of-interest safeguards, and - as documented by FBIH audit findings and independent CSO reporting - only a small share of CSO funding was distributed through transparent competitive procedures.

In **Serbia**, in 2025, there still was no official comprehensive database publishing the total public funding disbursed to CSOs. Annual government decrees adopted in 2025 operationalised the existing legal framework for award procedures (established by the 2018 regulation) by defining annual funding programmes and scoring rubrics, yet implementation remained uneven and CSO funding continued to be channelled through multiple budget lines and institutions, limiting overall transparency of allocations and outcomes. In **Türkiye**, despite the considerable amounts provided in the official national budget under the “Transfers to Non-Profit Organisations” budget heading, other than the amounts provided by the Ministry of Interior project support programme, breakdown and detailed information continued to be unavailable in 2025. Hence, it was impossible to determine how much was transferred specifically to which CSOs or to calculate a consolidated share of the public budget for CSOs. Legal provisions on award procedures continued to exist in various directives, yet they still lacked clear rules on funding levels and criteria, and comprehensive data on total CSO funding was not systematically disclosed, so public funding remained limited, fragmented and insufficiently transparent, with no notable improvements.

Public funding provided to CSOs by national governments in 2025		
IPA beneficiary	Amount (in EUR)	Explanation / Source
Albania	~ 2 million	Public funds provided to CSOs in 2025 by the ASCS, and the National Youth Agency
Bosnia and Herzegovina	~ 23.5 million	As provided on the Transparency International BiH’s “NVO Transparentno” database for 2024. The total public funding provided to CSOs annually is even higher around 50 million EURs as provided by the Center for Research and Studies (GEA, 2023)
Kosovo	~ 16.5 million	Public funds allocated for NGOs in 2025 as published in the Government Annual Report on Public Funding for NGOs
Montenegro	~ 5.7 million	2025 data provided by the Ministry of Regional Investment Development and Cooperation with NGOs, provided for projects and programmes in areas of public interest and for supporting persons with disabilities
Republic of North Macedonia	~ 29 million	Public funds provided to CSOs in 2025 as published on the website of the Government Unit for Cooperation with CSOs
Serbia	~ 99 million	2025 planned national budget under economic classification 481-grants to non-governmental organisations
Türkiye	~ 429.7 million	2025 data for cash transfers made to not for profit organisations under national budget under economic classification 5.3.1

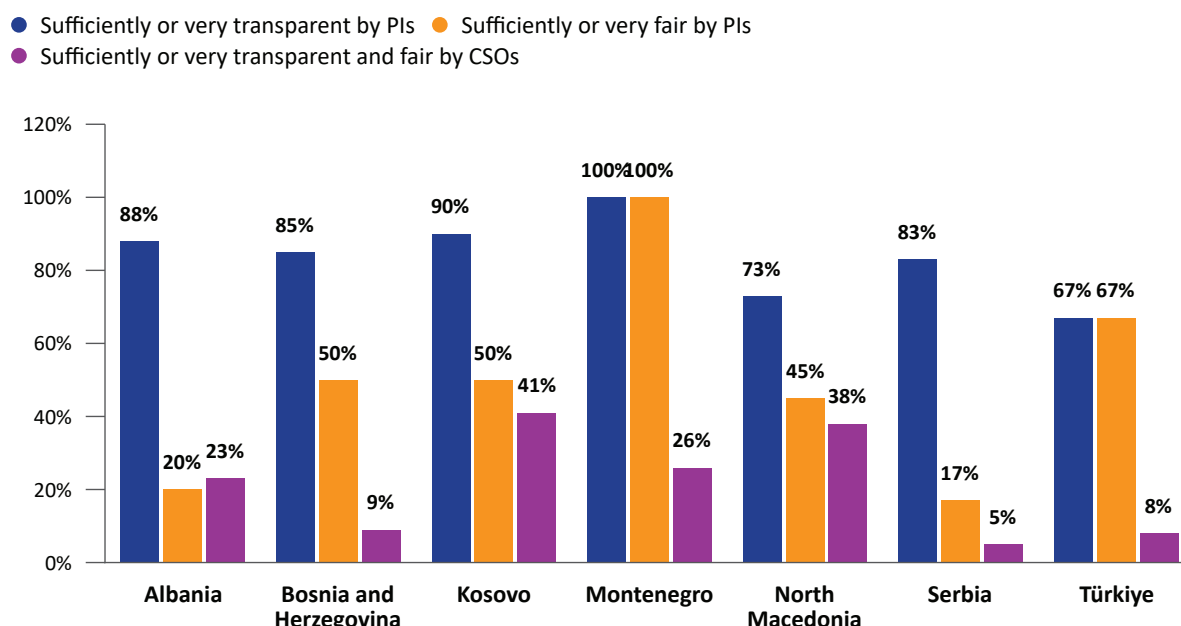
With regards to survey findings, only 21% of CSOs assessed public funding provision as transparent and fair. This was the highest in **Kosovo** with 41%, followed by the **Republic of North Macedonia** (38%), **Montenegro** (26%) and **Albania** (23%). The lowest was in **Serbia** with 5%, while in **Bosnia and Herzegovina** and **Türkiye**, less than 1 in 10 CSOs perceived public funding as transparent and fair, with 9% and 8% respectively. While **Albania**, **Kosovo**, **Montenegro** and the **Republic of North Macedonia** increased this perception in 2025, **Türkiye** and more significantly **Bosnia and Herzegovina** showed further decreases, and **Serbia** maintained its proportion as being the lowest in the region.

Proportion of CSOs indicating that public funding is sufficiently or very transparent and fair



When the perceptions of CSOs and public institutions regarding the transparency and fairness of public funding are compared, considerable differences were seen. 84% of public institutions taking part in the 2025 survey assessed the provision of public funding for which their organisation was responsible as very or sufficiently transparent. The perception about fairness was considerably lower, with 47% of respondents assessing it as very or sufficiently fair. The highest positive perceptions of public institutions were seen in **Montenegro** with 100% for both transparency and fairness. The lowest transparency score by public institutions was seen in **Türkiye** with 67%, while **Serbia** rated lowest for fairness with 5%.

Proportion of Public Institutions vs. CSOs reporting on the transparency and fairness of public funding



In 2025, the proportion of CSOs stating that they applied for public funding increased considerably in the region (+25%). This increase was highest in **Albania** (40% in 2024 vs. 68% in 2025), followed by the **Republic of North Macedonia** (36% vs. 62%), **Türkiye** (+16%) and **Bosnia and Herzegovina**, **Kosovo** and **Montenegro** (all +9%). This increase was also reflected in success rates with 46% of CSOs reporting that their application was accepted, compared to 30% in 2024. Success rates were above 50% in **Kosovo** (55%), **Bosnia and Herzegovina** (52%) and **Montenegro** (57%). The lowest success rate was recorded in **Türkiye** with 30%, followed by **Serbia** (36%). **Albania** (45%) and the **Republic of North Macedonia** (46%) also recorded considerable success rates, which are higher than in 2024.

Proportion of CSOs that applied for public funding	
2025	68%
2024	46%
2023	51%
2021	49%

When specific thematic fields are concerned, CSO survey responses indicate that the proportion of CSOs working on human rights and gender equality and LGBTIQ+ rights not applying to public funding was higher than the regional average. While the regional average for not applying was 32% in 2025, 37% of CSOs working on human rights and 41% of those working on gender equality and LGBTIQ+ rights refrained from applying to public funds.

Thematic field	Proportion of CSOs that did not apply for public funding, by thematic field n = no. of CSOs that did not apply for public funding		Proportion of CSOs working in each thematic field that did not apply for public funding n = no. of CSOs from the respective fields that did not apply	
	2025	2024	2025	2024
Human rights	43%	23%	37%	52%
Social inclusion	23%	15%	28%	43%
Minority rights and non-discrimination	17%	8%	32%	52%
Gender equality and LGBTIQ+ rights	21%	13%	41%	51%
Rights of people with disabilities	12%	9%	25%	44%
Children's rights	13%	8%	24%	58%

With regard to awarding of public funding, even though 5% of CSO respondents claimed that their rejection was because public authorities were unwilling to support the work carried out with the constituencies they serve and represent, survey responses did not show specific discrimination based on the thematic field of organisations. However, in some countries, some thematic fields showed lower acceptance rates than others. For example, in **Albania**, the reported public funding approval rate for CSOs working on minority rights and non-discrimination - though this warrants further analysis in light of the thematic priorities the responsible agency sets annually - was 38% vs. 62% rejection; in the **Republic of North Macedonia**, CSOs working on human rights reported an approval rate of 38% vs. 62% rejection; in **Türkiye**, CSOs working on human rights reported rejection by 25% vs. 75%, for gender equality and LGBTIQ+ rights, this was 10% vs. 90%.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	2	3	5	5	3	3	2
2024	2	3	5	3	3	3	2
2023	2	3	5	4	3	3	2
2021	2	3	5	4	3	3	2

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

Kosovo continued to have the most enabling regime, maintaining generous deductions of up to 10% of taxable income for both individual and corporate donors to public-benefit activities, even though some inconsistencies between tax and NGO legislation remain. **Montenegro** was the only IPA beneficiary in the region to record clear progress in 2025 on tax incentives for donations to CSOs, with legal changes that improved both individual and corporate tax relief and led to an increase in its score under this indicator. In all other IPA beneficiaries the fiscal framework remained broadly unchanged, and no reforms were adopted that would significantly strengthen tax incentives for private giving to civil society.

Albania's tax environment stayed largely non-incentivising, with no tax deductibility for individual donations to CSOs and only marginal corporate deductions within narrow profit-based limits. **Bosnia and Herzegovina** continued to allow partial tax relief for donations and sponsorships to public-benefit purposes, but the rules remained fragmented and non-harmonised across the different tax jurisdictions, limiting their overall impact. In the **Republic of North Macedonia**, long-discussed amendments to expand tax incentives for donations and sponsorships had still not been adopted by 2025, leaving in place relatively low ceilings for deductible individual and corporate contributions. **Serbia** did not introduce any material reforms, so individual donors continued to lack a general tax incentive and corporate giving retained only limited tax recognition. In **Türkiye**, tax relief remained restricted to donations to a small number of public-benefit associations and tax-exempt foundations, with access to these privileged statuses constrained and no comprehensive enabling tax regime for CSO donations established.

With regard to the proportion of individual giving, in 2025, the Charities Aid Foundation (CAF) discontinued the World Giving Index, which had been published annually since 2010, and replaced it with a new World Giving Report using a substantially different methodology. As the indicator 1.8.b was based on the CAF findings in previous years, directly comparable figures on the proportion of private individuals who gave money to a CSO are no longer available for IPA beneficiaries other than Serbia and Türkiye. Even for these two countries, the figures under the new methodology were included with caution, as they are not directly equivalent to the previous 'gave money to a CSO' measure and cannot be reliably compared with previous Guidelines assessments.

Although not directly compared to previous assessments, in **Kosovo**, the KCSF Annual Population Survey showed that 6.5% of respondents reported donating money specifically to a CSO in 2025. In **Serbia**, which is one of the few countries for which CAF still publishes data, 36% of the population reported donating to charity in 2025, down from 43% in 2024 and 41% in 2023; however, even here the category "donated to charity" in the updated World Giving Report is not identical to the earlier indicator "gave money to a CSO", and the figures should be interpreted with caution. Similarly in **Türkiye**, CAF 2025 World Giving Report's Türkiye data show that 49% of individuals supported charities, down from 57% in 2024, yet similar to Serbia, this is not exactly comparable with previous years.

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 purpose by CSOs is not subject to corporate income/profit tax

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	3	3	4	3	3	3
2024	3	3	3	3	3	3	3
2023	3	3	3	3	3	3	3
2021	3	3	3	3	3	3	3

For 2025, tax regimes on CSO income stayed broadly stable across the region, continuing to offer partial exemptions for grants, donations and membership fees while still taxing most market-based economic activity. **Montenegro** was the only IPA beneficiary to register a clear positive development under this indicator, reflected in an increased score, where the adoption of the Strategy for the Development of the Social Economy 2025-2029, with a dedicated budget and a planned Law on Social Economy, strengthened the framework for CSO economic activities and diversification of funding, leading to an improvement in the legal framework, even though implementation will only start from 2026.

CSOs in **Albania** remained exempt from income tax on grants, donations, membership fees and similar income, and the 0% VAT regime for foreign-funded projects was significantly improved in 2025, though procedures are still administratively demanding and profit tax still applies to economic activities unless general-interest criteria are met. In **Bosnia and Herzegovina**, the tax regime stayed partially enabling and non-harmonised across entities, with some exemptions for mission-related income and a specific VAT relief for food donations, but no comprehensive change to CSO income taxation. In **Kosovo**, core exemptions for grants and donations remained, yet ambiguities persisted around income from economic activities, especially the undefined “reasonable level” threshold that should have been clarified in secondary legislation. CSOs in the **Republic of North Macedonia** continued to enjoy profit-tax exemptions for non-economic income and a low tax (1%) on economic revenue above a threshold, while preparation of the Law on Social Enterprises advanced but was not yet adopted, so the overall tax treatment remained unchanged. In **Serbia**, partial tax benefits under corporate income tax, property tax and VAT persisted without substantive reform, and the RSD 400,000 threshold for exempt economic income stayed in place, leaving the framework only moderately supportive of CSO financial sustainability. In **Türkiye**, the tax regime remained the same, with significant taxation of income-generating activities and stricter asset and income thresholds for tax-exempt foundations introduced through amendments to the general circular, increasing compliance burdens and the risk of losing tax-exempt status.

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

Indicator 1.10.a: Laws regulating volunteering are adopted

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	4	1	2	3	2	1
2024	2	4	1	2	3	2	1
2023	2	4	1	2	3	2	1
2021	2	4	1	2	3	2	1

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	1	1	2	3	3	3	1
2024	1	1	2	1	3	3	1
2023	1	3	2	1	3	3	1
2021	1	3	2	1	3	3	1

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

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

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

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

In 2025, the overall policy and legal environment for volunteering remained largely unchanged across the region and still does not systematically incentivise or facilitate volunteering and employment in CSOs. **Albania** was the only IPA-beneficiary to adopt a new volunteering law, the Law on Volunteering (Law 94/2025), that recognised volunteering as work experience in recruitment procedures and introduced state compensation for insurance contributions paid by volunteer providers. Despite the fact that this new law improved the framework, its practical effects are yet to be seen, with significant implementation and structural gaps remaining to date.

In **Bosnia and Herzegovina**, volunteering continued to be regulated at entity and district level, with no state-level law adopted despite ongoing civil society advocacy, and the situation remained stable, meeting most standards but without new progress. The legal framework in **Kosovo** still covered only youth volunteering under the 2024 Law on Youth, with no provisions for other age groups and the new Agency for Youth not yet operational; so the situation continued to fall short of the standard. In **Montenegro**, the Law on Volunteer Work remained unchanged and continued to create practical barriers to civic engagement despite a newly established working group to draft a new law, leaving

the score minimally meeting standards. In the **Republic of North Macedonia**, volunteering remained to be governed by the existing Law on Volunteerism; proposed amendments have not yet been adopted, and planned reforms are only foreseen in the 2025-2028 Civil Society Cooperation Strategy, so the framework still moderately meets standards without change. The 2010 Law on Volunteering of **Serbia** remained in force and continued to be considered overly administrative and insufficiently enabling, with no new draft law entering parliamentary procedure in 2025, so the situation continued to minimally meet standards. No comprehensive volunteering law was adopted in **Türkiye**, where the draft prepared in 2022 did not progress, leaving longstanding regulatory gaps on the status, rights and obligations of volunteers and meaning that volunteering still does not meet standards.

With regards to government strategies and programmes to support volunteering in CSOs, other than Montenegro, where The Strategy for the Development of Volunteering 2026-2029 was adopted in December 2025, most countries still lacked comprehensive, well-resourced schemes for promoting volunteering.

The new budgeted strategy specifically dedicated to volunteering in **Montenegro**, filled a decade-long gap since the previous strategy expired in 2015, and marks a clear positive step even though its practical impact is still to be seen. The Strategy is built around two main objectives: strengthening the volunteering system and infrastructure and improving recognition and promotion of the social value of volunteering. The Strategy aims to provide financial and institutional support to CSOs, including through volunteering promotion via the Network of Volunteer Resource Centres, improve coordination, support volunteers and volunteering organisations. However, its Action Plan signals potential continuation of registering volunteer contracts, which was one of the highly criticised shortcomings of the existing regulatory model.

In **Kosovo**, youth remained the only group covered by a strategic framework for volunteering through the Youth Strategy 2024-2032, while a long-discussed Concept Document on volunteering and broader government strategies were still in preparation but not yet adopted. **Bosnia and Herzegovina** adopted no new dedicated volunteering strategies at any level of government following the expiry of Republika Srpska's volunteering strategy in 2023, with only scattered youth-policy elements touching on volunteering. In the **Republic of North Macedonia**, the National Strategy for Promoting Volunteerism (2021-2025) and its Action Plan expired in 2025, while the government did not initiate the process for the preparation of a new one. In practice, incentives and support for volunteering have not advanced: volunteers still only receive tax-free reimbursement of basic expenses, and CSOs can access limited subsidies via employment programmes. State-supported initiatives have not adapted or evolved, which continued to restrict opportunities to strengthen volunteer participation.

No national volunteering strategies or government volunteering programmes with dedicated resources were in place in **Albania**, **Serbia** and **Türkiye**, and this persistent gap continued to mean that volunteering in CSOs remained without structured state support.

The proportion of CSOs that benefited from state volunteering strategies and programmes remained very low overall, with only 6% of CSOs reporting that they have benefited from such programmes in 2025, a level broadly comparable with previous years (4% in 2024).

Across the region, data on CSO employment as a share of the total workforce were available only for some IPA beneficiaries, and where they existed, they showed that employment in CSOs remains a very small part of overall employment, with Kosovo showing a relatively higher percentage. In **Bosnia and Herzegovina**, combining available tax and administrative data suggests that around 0.62% of total employment was in CSOs, although this figure should be interpreted with caution because the underlying datasets are not fully harmonised across jurisdictions. In **Kosovo**, pension fund data showed that employed staff in CSOs account for about 3.9% of the workforce, down from 4.5% in 2024. In the **Republic of North Macedonia**, based on World Bank reports, CSO employment stood roughly around 0.32%,

a level broadly unchanged in the aggregate. In **Serbia**, according to the Labour Force Survey, people registered in the “activities of membership organisations” category represented about 0.43% of the active workforce, broadly unchanged compared to 2024. In **Albania, Montenegro and Türkiye**, no disaggregated official statistics could be identified for 2025 that would allow the number of employees in CSOs to be calculated as a proportion of the national workforce.

The proportion of CSOs that benefited from state employment strategies and programmes continued declining, with 10% recorded in 2025. Only in the **Republic of North Macedonia**, did this proportion see an increase this year, from 3% in 2024 to 9%. **Montenegro** once again recorded the highest rate with 20% of respondents reporting benefit from employment programmes; however, it saw a decline of 1% compared to 2024. **Türkiye** was stable at 3%, presenting the lowest percentage in the region. All other countries faced declines, with **Albania** showing the sharpest drop from 12% to 6%; followed by **Serbia** with a decrease of 3% (6% in 2025 vs. 9% in 2024), **Kosovo** (13% vs. 15%), and **Bosnia and Herzegovina** (13% vs. 14%) respectively.

Proportion of CSOs that benefitted from government employment programmes	
2025	10%
2024	11% ¹⁷
2023	12%
2021	16%



¹⁷ This figure was corrected based on the 2024 country report findings.

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

In 2025 the overall picture remained **mixed and largely unsatisfactory**. Formal frameworks for participation exist in most IPA beneficiaries, but they do not yet translate into systematic, effective inclusion of CSOs in decision- and policy-making. The key pattern is a **widening gap between law and practice**: rules, platforms, councils and strategies are in place or in preparation, yet consultations are frequently rushed, bypassed or treated as a formality, and participation is skewed towards larger, better-resourced organisations.

Inclusion in decision- and policy-making

Core safeguards - early access to drafts and at least 15 days for comments - remained embedded in most legal frameworks, but 2025 brought no strengthening reforms. The only significant change was in Serbia which was rather negative. Here amended Government Rules of Procedure created a loophole to skip mandatory public debates. Three IPA beneficiaries persisted: **Kosovo, Montenegro and Republic of North Macedonia** with the most favourable frameworks (Republic of North Macedonia even extended ENER consultations to 30 days), though implementation was uneven - notably in Kosovo, where a political crisis deepened the deterioration; **Albania and Bosnia and Herzegovina** as an intermediate group with inconsistent, often ad hoc practice and late publication of drafts; and **Serbia and Türkiye** as the least favourable environments, with discretionary consultation and no obligation of early access in Türkiye.

Online platforms operated everywhere except Türkiye but were only partially used: Albania's portal hosted 96 drafts with just 9 commented; Kosovo published far fewer documents with under 5% attracting input; only 13 of 96 CSO survey respondents claimed public-debate reports in Montenegro could be verified; and Serbian ministries often treated the portal as a formal step. **Expedited procedures** continued to compress consultation space, particularly in Bosnia and Herzegovina and the Republic of North Macedonia.

Survey data confirm how rarely consultations are effective: 58% of CSOs participated in at least one consultation, but under the revised, stricter methodology **only 6% experienced consultations meeting both effectiveness criteria** (down from 19% in 2024). Gaps were sharpest in Albania (68% participated vs. 4% effective) and Serbia (64% vs. 9%). Public officials saw it differently: **82% considered consultations effective**, illustrating a **significant perception gap**. **Working groups** remained only partially regulated - membership depends largely on informal invitations, participation ranged from 8% (Türkiye) to 52% (Republic of North Macedonia), and smaller, newer and rights-based organisations were clearly less likely to get a seat at the table.

Recognition and strategic cooperation

Political recognition and strategic cooperation frameworks remained fragile and uneven, with councils and strategies **often constrained by limited budgets and weak political backing**. The most visible progress concerned new civil-society cooperation strategies drafted in Bosnia and Herzegovina, the Republic of North Macedonia and Kosovo, each through structured, participatory processes - yet even here effective consultation was rare (7%, 16% and 8% respectively of engaged CSOs). Organisational size remained decisive for access: **only 42% of CSOs with turnovers below EUR 25,000 took part in a consultation**, against 69% of those above EUR 100,000, confirming structural barriers for smaller and grassroots organisations.

Taken together, inclusion in consultations is numerically more frequent than in earlier cycles, but **meaningful and timely consultation remains rare**: effective processes are the exception, working groups are not consistently inclusive, and the widening perception gap between CSOs and public officials on what “effective participation” means continues to hinder genuine partnership.

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

Indicator 2.1.a: Laws, bylaws, 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 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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	2	3	3	2	2	1
2024	3	2	3	4	2	2	1
2023	3	2	3	4	2	1	1
2021	3	2	3	4	2	2	1

Indicator 2.1.b: CSOs are effectively included in oversight mechanisms¹⁸**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 recommendations¹⁹**

The two fundamental elements of meaningful public consultation, namely early access to draft legislation throughout the drafting process and sufficient time for stakeholders to provide comments before adoption, continued to be regulated in the legal frameworks of most countries in the region in 2025. No major legislative reforms were introduced to strengthen these guarantees, with the exception of **Serbia**, where amendments to the Government Rules of Procedure rather weakened one of the existing consultation safeguards. Overall, the region continues in 2025 to display a gap between formal legal provisions and their implementation. While most countries have established minimum standards regarding the timing of consultations and access to draft legislation, the quality and consistency of their application vary considerably across institutions and countries.

Against this background, the seven countries can be grouped into three broad categories. The Republic of North Macedonia, Montenegro and Kosovo continue to provide the most favourable legal and institutional frameworks. In these countries, legislation establishes relatively clear requirements for early public consultation, ensuring that CSOs have access to draft legislation during the drafting process and are generally provided with at least the minimum period for submitting comments before adoption. In the **Republic of North Macedonia**, the consultation period on the ENER platform was further extended from 20 to 30 days in 2025, while **Kosovo** maintained the minimum standards introduced through the 2024 Government Rules of Procedure, including early access to draft legislation and a minimum 15-working-day consultation period. **Montenegro** likewise continued to require public consultations for draft laws and strategies, generally lasting between 20 and 40 days. While implementation remains uneven and, in Kosovo, the prolonged political crisis significantly reduced legislative activity during 2025, the legal safeguards themselves remained largely intact.

Albania and Bosnia and Herzegovina represent an intermediate group. Both countries maintain legal provisions requiring public consultation and minimum commenting periods before draft legislation enters the adoption procedure. However, implementation remains inconsistent. In **Albania**, consultations in 2025 continue to be formally organised through the public consultation portal in line with the legal framework, but substantive engagement remained limited with limited consideration given to received input and a lack of meaningful feedback on how comments were addressed. In **Bosnia and Herzegovina**, although the state-level framework provides minimum consultation periods of 15 or 20 days depending on the expected public impact of draft legislation, implementation varies considerably across different levels of government, with consultations often taking place later in the drafting process, limiting opportunities for early and meaningful participation. In both countries, the principal challenge lies not in the absence of legal guarantees but in their inconsistent application in practice.

Serbia and Türkiye present the least favourable environment concerning these two consultation standards. In **Serbia**, although the legal framework formally continues to provide for public consultation and minimum commenting periods, the 2025 amendments to the Government Rules of Procedure introduced a significant loophole allowing mandatory public debates to be bypassed, thereby weakening guarantees for timely public participation. In **Türkiye**, consultation with CSOs remains largely discretionary, as public authorities are not legally required to involve civil society during the drafting process. Although 15-days is foreseen where consultations are organised, there is no obligation to provide CSOs with early access to draft legislation or to conduct consultations systematically. As a result, both legal and practical barriers continue to limit meaningful participation in the legislative process.

¹⁸ Similar to 2024, this indicator was not assessed in 2025.

¹⁹ Similar to 2024, this indicator was not assessed in 2025.

In 2025, across the region, civil society participation in governmental working groups remained only partially regulated and uneven in practice. The legal frameworks generally did not contain detailed, enforceable provisions requiring transparent selection criteria for CSOs to become members of working groups through public calls, nor did they mandate the systematic inclusion of diverse groups representing ethnic minorities, LGBTIQ+ people or persons with disabilities. As a result, working group participation continued to depend largely on informal invitations, institutional discretion and the existing relationships of better-resourced CSOs, rather than on open, rights-based procedures.

IPA Beneficiary	CSO participation in working groups	Structural finding
Albania	23%	Legal basis for participation exists, but public institutions themselves describe working-group use as occasional and insufficiently structured.
Bosnia and Herzegovina	48%	Working groups are used as an involvement mechanism, but there is no uniform country-wide approach requiring public calls, clear criteria or equal treatment; newer and smaller organisations are markedly less likely to hold membership than older, better-staffed CSOs.
Kosovo*	33%	Government Rules of Procedure strengthened the obligation to include civil society through open and transparent processes, but political instability and low overall legislative activity reduced the number of participation opportunities, while access in practice continued to depend largely on institutional invitations and established relationships.
Montenegro	39%	Establishment and composition of working groups remain regulated primarily at the level of individual processes, without binding requirements for broad, inclusive civil society representation.
Republic of North Macedonia	52%	As in Montenegro, composition is regulated process-by-process, without binding requirements for broad, inclusive representation.
Serbia	37%	The normative framework allows inclusion via public calls, but no changes were made in 2025 to introduce stronger safeguards for transparent selection or diverse representation.
Türkiye	8%	Participation remains largely discretionary and issue-driven, with no overarching requirement for open calls or guaranteed inclusion of diverse constituencies; engagement in legislative drafting often occurs through one-off, project-based arrangements rather than institutionalised membership.

Taken together, these findings indicate that, while working groups are widely used as a channel for involving CSOs in drafting laws and policies, they rarely operate as structured, inclusive participation mechanisms: access is uneven, formal rules on open selection and diversity are limited or absent, and smaller, newer and rights-based organisations still face barriers in turning consultation participation into a seat at the table.

In 2025, online platforms for public consultation in lawmaking continued to be in place across the region except **Montenegro** and **Türkiye**. In **Albania**, the government reported that consultation-result reports were published for all 45 monitored consultations, with 2,228 stakeholders and 1,131

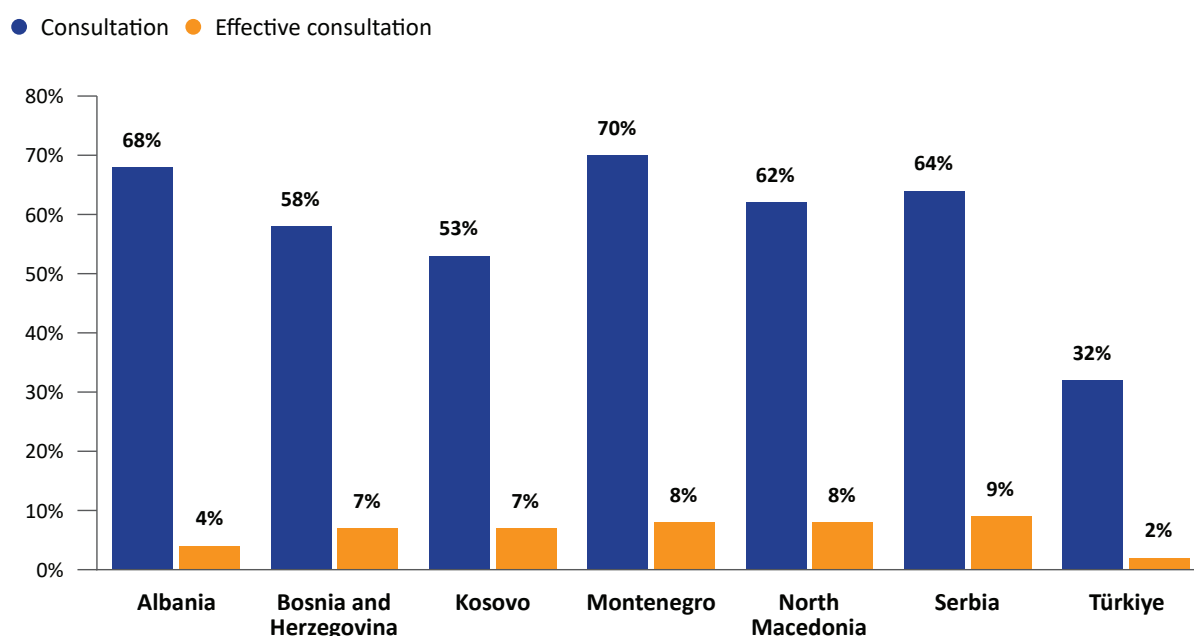
comments, around two-thirds of which were accepted fully or partially. At the same time, a manual check of the e-consultation platform found 96 drafts open in 2025, but only 9 received comments from 12 CSOs; although reports were published for those consultations, CSOs noted uneven early access to drafts and feedback, so the platform's potential for meaningful participation was only partly realised. In **Bosnia and Herzegovina**, 69 institutions registered on the online platform, 454 consultations were conducted and 352 reports published in 2025, yet public response on the portal remained low, some institutions still failed to publish consultation reports, and there was no systematic online reporting on outcomes at entity and district levels, limiting the overall impact of the platform. In **Kosovo**, the prolonged political crisis, including delays in constituting the Parliament, a caretaker government with limited powers, and repeated election cycles, significantly reduced legislative activity. As a result, only 108 documents were published on the online consultation platform in 2025 (compared to 259 in 2024), mostly administrative instructions and regulations. The platform itself was also non-operational for approximately two months during the year and experienced recurring interruptions even when accessible - technical problems, also present in 2024, that CSOs reported prevented them from submitting comments. Reflecting both factors, fewer than 5% received any input through the platform, with most comments continuing to be submitted through offline or alternative channels. In the **Republic of North Macedonia**, out of 133 law proposals, 27 (36.5%) were published in the ENER, representing an increase of 3% compared to 2024; however, in most consultation reports, comments were not analysed and only the list of key consulted stakeholders was provided. Furthermore, participation and comments of CSOs decreased compared to the previous years. In **Serbia**, the updated framework required consultations and public hearings to be conducted via the online portal, but institutional records and the Ombudsman's report indicated that many ministries treated online consultations as formal steps rather than substantive engagement, with inconsistent use of the portal and limited transparency about how online comments influenced final decisions.

In 2025, the over-reliance on urgent or shortened procedures for adopting laws remained a concern in several countries, with expedited procedures continuing to bypass or compress consultation, even though detailed quantitative data on their use were not available for all seven IPA beneficiaries. In **Albania**, the Parliament adopted 91 laws in 2025, with only 2% adopted under accelerated procedure, so fast-tracking was quantitatively exceptional. However, existing parliamentary data do not explain why these procedures were used or whether public consultation still took place, meaning the requirement that accelerated procedures be duly justified cannot be verified in practice. In **Bosnia and Herzegovina**, the use of urgent and shortened procedures remained a critical problem, with four of the six laws adopted by the House of Peoples in 2025 being processed under urgent procedure, where consultations with civil society hardly used, severely limiting opportunities for CSO input. In **Kosovo**, the expedited procedure for legislation remained legally limited to emergencies and exceptional circumstances, requiring Prime Ministerial approval and justification, but political crisis and reduced legislative activity in 2025 meant that fewer draft laws were processed overall, and the main concern shifted from over-use of fast-track procedures to low levels of consultation and participation. In **Montenegro**, in 2025, 111 of the 153 laws were subject to the consultation and public participation requirements under the Regulation. Although it was not possible to conclude that the remaining 42 laws were all adopted under an expedited procedure, specialised CSO reports as well as the validation focus group participants confirmed the noticeable trend towards avoiding public debates, with an increasing number of laws - including the Public Gatherings, National Security Agency, and Internal Affairs laws - submitted by MPs rather than the Government, bypassing the Regulation's public debate requirements. This trend was likely driven by pressure to fast-track EU acquis alignment was a key factor behind the downgrade of Indicator 2.1.a. In the **Republic of North Macedonia**, the proportion of laws adopted in regular procedure was smaller than those adopted in expedited. Namely, 54% (121/224) of laws were adopted in extraordinary/expedited procedures whereas 46% (103/224) adopted in regular procedure. In **Serbia**, the share of laws adopted under urgent procedure in parliament was 20%, while the 2025 amendment

to the Government Rules of Procedure introduced a new mechanism allowing the Government to skip the mandatory public hearing phase altogether, creating a discretionary shortcut that can further reduce meaningful public and CSO consultation.

With regard to CSOs' participation in consultation processes, as assessed by survey, a methodology change was introduced for this year's assessment. In previous years, the survey assessed "effective consultation" through a single question, accompanied by a definition stating that effective consultation meant having early and all through access to draft documents and at least 15 days to respond; however, respondents did not rate each of these criteria separately. With this approach, in 2024, 19% of CSOs stated that they were effectively consulted. In 2025, the methodology was revised so that, for each level of consultation, CSOs were asked about the two effectiveness criteria separately, allowing them to indicate whether one, both, or neither were met. Under this new approach, 58% of CSOs across the region reported that they had been included in at least one consultation process, but only 6% experienced consultations that met both effectiveness criteria at the same time, revealing a substantial gap between taking part in consultation and effective consultation. Compared to 19% recorded in 2024, 6% presents a huge drop, indicating that while consultations are relatively common in the region, effective consultation is an exception. In 2025, the proportion of CSO respondents taking part in at least one level of consultation vs. in effective consultations that met both criteria were as follows: **Montenegro** recorded 70% of CSOs taking part in at least one level of consultation with only 8% met both criteria; followed by **Albania** with the biggest gap (68% vs. 4%), **Serbia** (64% vs. 9%), the **Republic of North Macedonia** (62% vs. 8%), **Bosnia and Herzegovina** (58% vs. 7%), **Kosovo** (53% vs. 7%), and lastly **Türkiye** (32% vs. 2%).

Proportion of CSOs taking part in consultations vs. in effective consultations



By contrast, 82% of respondents (compared to 61% in 2024) from among public officials were of the view that CSOs were effectively consulted in the development of laws, bylaws, strategies and other acts of public interest for which their institution was responsible. In **Kosovo** and **Montenegro**, all responding public officials found consultation processes as effective, while this was 93% in **Albania**, 88% in **Bosnia and Herzegovina**, 86% in the **Republic of North Macedonia**, 75% in **Serbia** and lastly 33% in

Türkiye. Furthermore, 84% of public officials stated that public consultation processes took the views of the public and CSOs fully or sufficiently into account and that the consultation mechanisms with CSOs are meaningful and effective.

Across the region in 2025, survey findings reflect that consultation participation was strongly correlated with organisational size: only 42% of CSOs with annual turnover below EUR 25,000 reported that they had taken part in at least one consultation process, compared with 69% of organisations whose annual turnover exceeded EUR 100,000.

Although the general trend is the same as in previous years, where CSOs with higher annual turnover were able to be included in consultation processes, 2025 rates are higher than the findings presented in the 2024 regional report, partly because the revised 2025 methodology now captures consultation involvement irrespective of whether the two effectiveness criteria are met, thereby highlighting the underlying size-based gap in access to consultation rather than only perceptions of effective consultation.

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

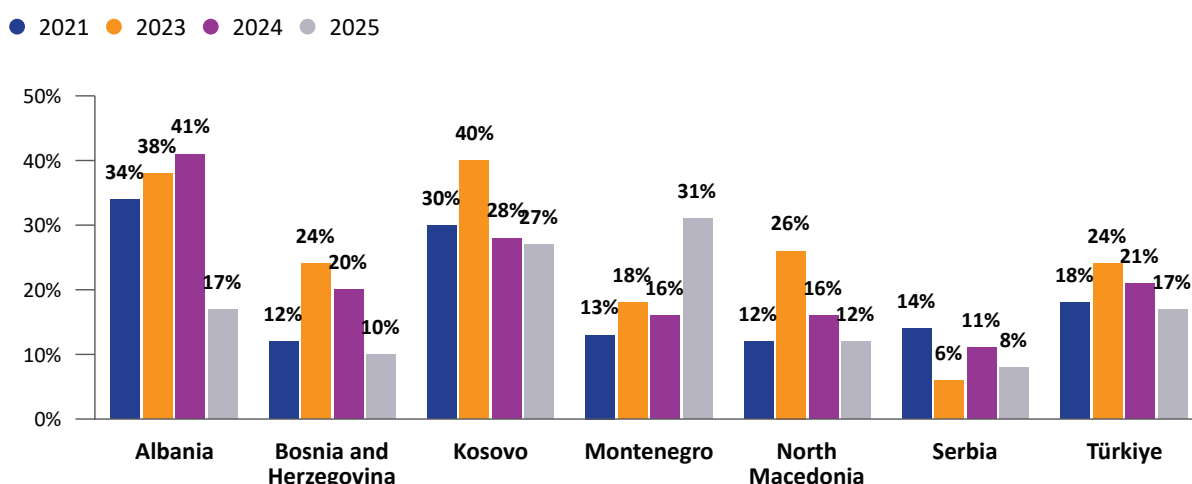
Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	1	1	2	3	1	1	1
2024	3	1	2	1	1	1	2
2023	2	2	2	1	2	1	2
2021	2	1	2	1	1	1	1

Across the region in 2025, CSOs' assessments of public institutions' attitude towards civil society were predominantly critical or ambivalent: only 17% of surveyed organisations described the approach as supportive, 45% as not supportive, and a further 38% as neutral, reflecting a more nuanced three-way scale introduced in this year's survey.

Proportion of CSOs assessing the attitude of public officials/institutions as		
	Supportive	Not supportive
2025	17%	45% (+38% neutral)
2024	21%	67%
2023	24%	66%
2021	18%	72%

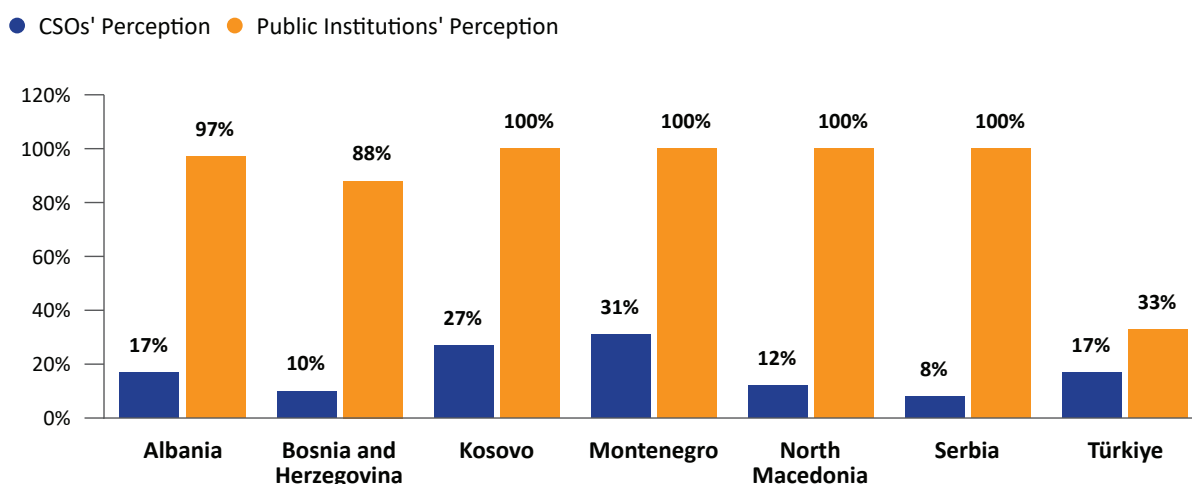
Montenegro, as being the only IPA beneficiary increasing its score for this indicator, recorded the highest rate of CSOs that assess public institutions as supportive with 31%, followed by **Kosovo** (27%), **Türkiye** (17%), and **Albania**, where 14% of CSOs described public institutions' attitude as supportive, while a combined 86% saw it as neutral or mostly negative/hostile, marking a sharp decline from previous years and highlighting the impact of the new "neutral" response option. The neutral option was not available in previous assessments. The lowest percentage was recorded in **Serbia** with 8%, followed by **Bosnia and Herzegovina** (10%) and the **Republic of North Macedonia** at 12%.

Proportion of CSOs assessing the attitude of public officials/institutions as supportive



On the contrary, public officials/institutions' self-perception diverged sharply, with 88% of surveyed institutions stating that public officials' approach to CSOs was supportive, underscoring a persistent gap between institutional self-assessment and CSO experience.

Proportion of CSOs and public institutions assessing the attitude of public officials/institutions as supportive



The gap between CSOs' and public institutions' perceptions was largest in **Serbia** (8% vs. 100%), followed by the **Republic of North Macedonia** (12% vs. 100%). The closest perceptions were recorded in **Türkiye** with 17% of CSOs vs. 33% of public institutions assessing the attitude as supportive.

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

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	1	2	1	5	5	5	1
2024	1	1	1	5	1	5	1
2023	5	1	5	5	5	5	1
2021	5	1	5	1	5	1	1

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	1	2	1	5	4	4	1
2024	1	1	1	5	3	1	1
2023	1	1	5	5	3	5	1
2021	1	1	5	1	1	1	1

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

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

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	2	1	1	3	5	2	1
2024	3	4	1	1	1	3	1
2023	4	4	3	1	1	4	2
2021	4	4	3	3	5	1	2

In 2025, valid civil society cooperation strategies were in force in Bosnia and Herzegovina, Montenegro, the Republic of North Macedonia and Serbia. In **Montenegro**, the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organizations 2022-2026 remained in place without any review or consultation on its content during the reporting period, while in **Serbia** the Strategy for Creating an Enabling Environment for the Development of Civil Society 2022-2030 continued to apply. In the **Republic of North Macedonia**, the Government adopted the Strategy for Cooperation with and Development of the Civil Society 2025-2028 on 8 July 2025 following a multi-stage consultation process launched in late 2024 and continued in 2025 till its adoption. In **Bosnia and Herzegovina** the Council of Ministers adopted, at its 84th session on 8 July 2025, the first Strategy for Creating an Enabling Environment for Civil Society Development 2025-2029 together with an Action Plan for 2025-2026 following a consultation process. **Albania's** Road Map for Government Policy towards a More Enabling Environment for Civil Society Development 2019-2023 remained expired with no successor strategy initiated, despite a detailed evaluation delivered in 2024. In **Kosovo**, the last Government Strategy for cooperation with civil society covering the period 2019-2023 expired and no new strategy was in force in 2025; despite the drafting process for a successor strategy having been initiated in 2024 and continued throughout 2025 - including the preparation of a draft text and its circulation for internal consultations among public institutions - the new strategy was not adopted during the reporting period. **Türkiye** continued to have no civil society cooperation strategy in force, as the draft Civil Society Strategy Document and Action Plan 2023-2027 prepared in 2022 remained inactive.

Civil Society cooperation strategy in effect and civil society consultation in the preparation of the new strategy, in 2025							
	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
Civil society cooperation strategy in place	No	Yes 2025-2029	No	Yes 2022-2026	Yes 2025-2028	Yes 2022-2030	No
Strategy development consultation process	No	Yes	Yes	No	Yes	No	No

In **Bosnia and Herzegovina**, the preparation of the Strategy of the Council of Ministers for Creating an Enabling Environment for Civil Society Development 2025-2029 was again one of the more positive examples of CSO consultation in 2025. Building on the work initiated in 2024, a joint working group composed of representatives of the Ministry of Justice and the Advisory Body of the Council of Ministers for Cooperation with NGOs continued to develop the draft Strategy and Action Plan. CSOs were consulted both through the eConsultations platform and through four in-person consultation meetings, during which comments were collected, discussed and, according to the Ministry, approximately two-thirds of submissions were accepted into the final text. 42% of CSO survey respondents reported that they were engaged with the Strategy consultations, while more than half responded negatively (52%). Furthermore, among the engaged CSOs, only 7% met both effectiveness criteria (access to drafts throughout the process and had at least 15 days to respond). The Ministry described the process as inclusive and confirmed that CSOs were meaningfully involved in the preparation of the Strategy and Action Plan, from drafting through to public consultations, while only 25% of public institution survey respondents assessed CSOs' engagement in consultations as sufficiently effective.

In the **Republic of North Macedonia**, the consultation process for the new Government Strategy for Cooperation with and Development of the Civil Society 2025-2028, launched in late 2024, continued and deepened in 2025. Following the initial public call inviting CSOs to propose measures and activities, a mixed working group of state institutions and civil society representatives was established in January 2025 to draft the Strategy and accompanying Action Plan. On 14 May 2025, the draft Strategy and Action Plan were published on the ENER portal for public consultation until 12 June 2025, allowing CSOs and other stakeholders to submit written comments. During the consultation period, two online and one in-person consultative meetings were organised, bringing together CSOs, government representatives, line ministries and members of the Council for Cooperation between the Government and the Civil Sector, providing multiple channels for input and discussion. 48% of CSO survey respondents reported that they were engaged with the Strategy consultations, while more than half responded negatively (54%). Furthermore, among the engaged CSOs, only 16% met both effectiveness criteria (access to drafts throughout the process and had at least 15 days to respond). Still, the preparation of the 2025-2028 Strategy posed as a structured, multi-stage and relatively inclusive consultation process, markedly more developed than the limited activity-proposal stage reported in 2024.

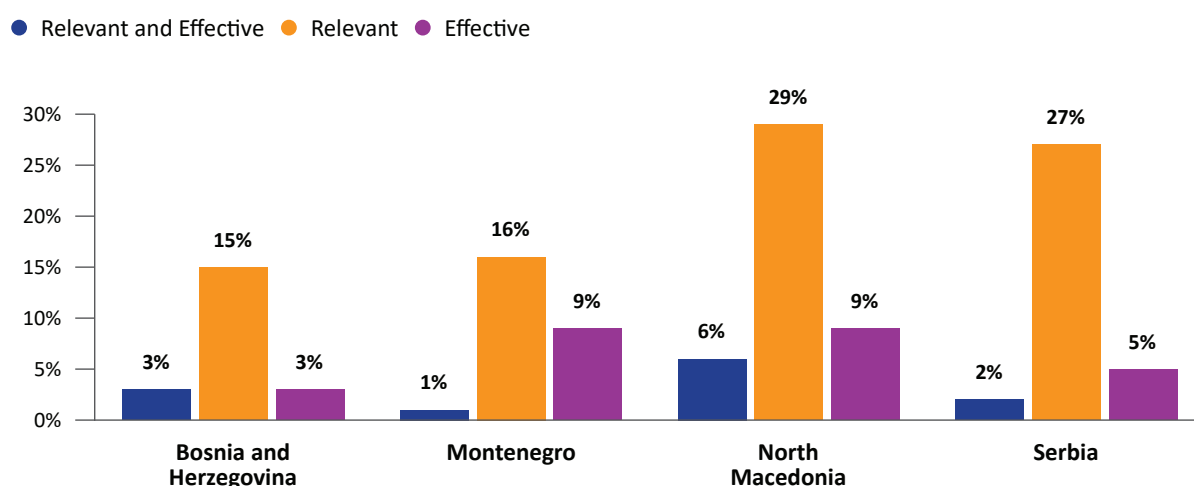
In **Kosovo**, the Office for Good Governance continued the participatory drafting process for the new Government Strategy for Cooperation with Civil Society by organising several consultative activities in 2025, including municipal-level meetings and a large consultation event to present the final draft and planned adoption steps. According to the 2025 CSO survey, 43% of responding CSOs took part in Strategy-related consultations, but only 8% of these actually met both effectiveness criteria.

The seven countries can be grouped into four broad categories with regard to the existence of budgeted action plans accompanying civil society cooperation strategies. **Montenegro** represents the strongest example, with a valid strategy supported by an adopted and budgeted action plan covering the entire implementation period. Although implementation remained slower than planned during 2025 due to delays in adopting related legislation and incomplete reporting by some institutions, the strategic and financial framework remained fully in place. The **Republic of North Macedonia** and **Serbia** also have valid civil society cooperation strategies accompanied by adopted action plans with allocated budgets. However, both countries continue to rely significantly on international donor funding to implement planned activities. While state budget resources have been earmarked, domestic financing remains insufficient to fully support implementation, preventing these frameworks from reaching full compliance. **Bosnia and Herzegovina** recorded the most significant progress in 2025. For the first time, the Council of Ministers adopted a Strategy for Creating an Enabling Environment for Civil Society Development (2025-2029) together with a budgeted Action Plan for 2025-2026. The Strategy applies primarily to BiH-level institutions. Albania, Kosovo and Türkiye continue to lack the fundamental

strategic framework required under this indicator. **Albania** and **Türkiye** have no civil society cooperation strategy in force, while **Kosovo** lost compliance following the expiry of its previous strategy and, in the absence of a newly adopted strategic document, had no valid budgeted action plan during 2025. Consequently, none of these three countries currently meet the requirements of this indicator.

In 2025, public structures responsible for implementing civil society cooperation strategies across the region continued to face capacity and resourcing challenges, even in countries that had formally adopted strategies and budgeted action plans. While all four countries with strategies in place (Bosnia and Herzegovina, Montenegro, the Republic of North Macedonia and Serbia) had designated institutions and at least some allocated funds for implementation, these structures often operated with limited human and financial resources and, in several cases, relied on external donor support to carry out core activities. Across all four countries with civil society cooperation strategies in place, institutional structures for implementation are formally established, but each operates with specific resource constraints that limit the practical impact of the strategies: in **Bosnia and Herzegovina**, implementation capacity remains nascent and largely confined to state-level institutions; in **Montenegro**, the ministry responsible for the strategy has only a small team and limited coordination capacity; in the **Republic of North Macedonia**, the Unit for Cooperation with CSOs has slightly improved staffing but no dedicated funds beyond salaries and must rely on project support; and in **Serbia**, the ministry in charge continues to work with very modest domestic budget allocations and chronic dependence on external donor financing for core strategic activities.

Proportion of CSOs assessing cooperation strategies as relevant and effective



Across the four countries that had national civil society cooperation strategies in place, only very small shares of CSOs considered these strategies both relevant and effective in 2025. In **Bosnia and Herzegovina**, just 3% of surveyed CSOs assessed the newly adopted Strategy as both relevant and effective, reflecting its early stage of implementation. In **Montenegro**, the proportion of CSOs rating the strategy as both relevant and effective dropped sharply to 1%, down from 14% in 2024 and 2023; 16% saw it as relevant and 9% as effective, while roughly half found it neither relevant nor effective. In the **Republic of North Macedonia**, 6% of CSOs considered the 2025-2028 Strategy both relevant and effective, with 29% rating it relevant and 9% effective, again lower than in previous years. In **Serbia**, only 2% of respondents assessed the national strategy as both relevant and effective, even though 27% rated it relevant; just 5% found it effective, while about two-thirds judged it ineffective.

Across the region, formal councils and advisory bodies for cooperation between civil society and central governments mostly existed on paper in 2025, but only a few, most notably in the **Republic of**

North Macedonia and, to a lesser extent, the newly reactivated council in **Montenegro**, operated as genuinely functional dialogue mechanisms, while in other countries these bodies remained inactive, sporadic if not largely symbolic.

In **Albania**, the National Council for Cooperation with Civil Society remained formally active and held at least one meeting in 2025, with minutes published, yet it lacked an agreed annual work programme, regular meetings and visible follow-up, and did not play a strategic role in shaping civil society policy, so it only minimally met the standards. In **Bosnia and Herzegovina**, the Advisory Body of the Council of Ministers of BiH remained the main formal mechanism for dialogue with civil society, but the mandate of its previous composition expired at the end of 2024, and no new members had been appointed by the end of 2025 despite two public calls, leaving the Advisory Body de-facto non-existent, without valid mandate, regular meetings, structured dialogue, or systematic follow-up on CSO recommendations throughout 2025. In **Kosovo**, the Council for Government Cooperation with Civil Society was also non-functional throughout 2025, as members' mandates had expired and no new appointments were made, leaving no regular institutional forum for dialogue between CSOs and the central government.

Serbia and Türkiye illustrate more constrained cases. In **Serbia**, although the Council for Creating an Enabling Environment for Civil Society had all the formal procedural elements on paper, CSO members froze their participation in January 2025 due to government's lack of response to attacks on civil society, and no Council sessions were documented for 2025, so the mechanism only minimally met standards. In **Türkiye**, the Civil Society Consultation Council under the Directorate General for Civil Society Relations remained inactive with no documented meetings or outputs, and no alternative national-level dialogue mechanism was established, meaning that the indicator did not meet standards.

By contrast, Montenegro and the Republic of North Macedonia recorded more positive developments. In **Montenegro**, the Council for Cooperation between the Government and NGOs was re-established after five years of inactivity, adopted rules of procedure and a 2026 work plan at its only meeting held to date in December 2025, and gave CSO members the right to put items on the agenda; however, with only this single meeting held so far, evidence on regular meetings and systematic follow-up was still limited, and whether the Council will contribute meaningfully to civil society remains to be seen. In the **Republic of North Macedonia**, the restructured Council for Cooperation between the Government and Civil Society met seven times during 2025, adopted a working programme, engaged actively in key law and funding processes, and operated transparently with published agendas, minutes and traceable follow-up, thus fully meeting the indicator standards.

Focus: Civil Society Participation in EU Accession Process

In **Albania**, the first RGF Monitoring Committee meeting took place on 24 September 2025, with two civil society organisations given speaking time; CSOs are not formal members of the Committee and may only attend. The selection process for participating CSOs remains unregulated, with no transparent criteria, and information-sharing is confined to agendas rather than substantive preparatory materials. This framework had not materially changed as of the end of 2025 [1].

Bosnia and Herzegovina's Reform Agenda was only approved by the European Commission on 4 December 2025, well behind the other five countries, so, no formal RGF Monitoring Committee (with or without civil society membership) had yet been established for Bosnia and Herzegovina during 2025 [2].

Kosovo's Reform Agenda was approved by the European Commission in October 2024, alongside Albania, Montenegro, the Republic of North Macedonia, and Serbia, but unlike those four countries, Kosovo's RGF Monitoring Committee did not hold a meeting in 2025.

The RGF Monitoring Committee in **Montenegro** formally includes five CSO representatives with permanent participant status, selected through public calls, alongside the European Commission co-chair and the National Coordinator for the Reform Agenda. In practice, the mechanism functions weakly: meeting preparation is limited, agendas are circulated late, and background materials are not shared systematically. Monitors recommend making the Committee “operational rather than merely formal”. [3]

The **Republic of North Macedonia’s** RGF Monitoring Committee held its first meeting on 2 July 2025, governed by Rules of Procedure that do not grant CSOs mandatory, permanent membership; participation was instead possible only as an “other relevant body” or by ad hoc invitation as a “participant”, selected either by the Government Council for Cooperation with CSOs or, as used at the first meeting, proposed by the EUD and the RGF Coordinator. This invitation-based model raised concerns about predictability, consistency, and transparency, tending to shift CSO participation towards formalistic rather than meaningful engagement [4].

Serbia continued to have the most advanced formal model in the region: the National Convention on the European Union (NCEU) holds full RGF Monitoring Committee membership with voting rights. However, access to documentation was an ongoing concern, where full intergovernmental contract texts and draft legislation/strategic documents were not systematically shared with civil society, despite this being an explicit requirement under the Reform Agenda [5].

Türkiye’s accession process remained suspended/frozen throughout 2025, and the country has not been a part of the Growth Plan process. EUD has been implementing a structured CSO dialogue process for programming purposes.

The general CSO survey conducted as part of the 2025 DG NEAR Guidelines Assessment included a question asking responding CSOs whether they had been involved in any consultation regarding EU accession programming in their country. The results are presented on the below table:

2025 Guidelines Assessment General CSO Survey - Consultation with CSOs in EU Accession Programming					
IPA beneficiary	Responses	Involved in ≥1 consultation	≥15 days to respond*	Document access throughout*	Met both criteria*
Albania	50	19 (38.0%)	12 (63.2%)	6 (31.6%)	2 (10.5%)
Bosnia and Herzegovina	31	7 (22.6%)	3 (42.9%)	3 (42.9%)	1 (14.3%)
Kosovo	30	6 (20.0%)	4 (66.7%)	2 (33.3%)	0 (0.0%)
Montenegro	74	14 (18.9%)	8 (57.1%)	5 (35.7%)	1 (7.1%)
Republic of North Macedonia	53	16 (30.2%)	5 (31.2%)	10 (62.5%)	1 (6.2%)
Serbia	86	8 (9.3%)	2 (25.0%)	4 (50.0%)	2 (25.0%)
Türkiye	133	20 (15.0%)	3 (15.0%)	17 (85.0%)	0 (0.0%)
Regional	457	90 (19.7%)	37 (41%)	47 (52.2%)	7 (7.8%)

* Percentages for the last three columns are of the “involved” respondents in that country, not of total responses.

Some notable findings that could be drawn were as follows:

- ➔ At the regional average, only 20% of responding CSOs reported being involved in an EU-accession related consultation in 2025. This was highest in **Albania** (38%) and the **Republic of North Macedonia** (30.2%); lowest in **Serbia** (9.3%) and **Türkiye** (15%).
- ➔ Across the region, access to the drafts throughout the process was more common (52.2%) than having 15-days minimum response time (41%). The minimum time criteria for effective consultation were highest in **Kosovo** (66.7%) and **Montenegro** (57.1%); lowest in **Türkiye** (15%), and **Serbia** (25%). Document access throughout the process was highest in **Türkiye** (85%), and the **Republic of North Macedonia** (62.5%). When effectiveness was concerned together, only 7% of EU-accession related consultations met both access and response time criteria. This was highest in **Serbia** (25%), and **Albania** (14.3%); lowest in **Kosovo** and **Türkiye** were no CSO reported a consultation that met both criteria.
- ➔ **Kosovo** and **Bosnia and Herzegovina** are the two countries where no RGF Monitoring Committee convened during 2025. Yet CSOs in both countries reported considerable involvement in EU-accession consultation (20.0% and 22.6% respectively, both above the regional average of 19.7%). This points to consultation happening through channels other than the RGF Monitoring Committee, since the survey question asked about EU accession programming broadly, not the Committee specifically.
- ➔ **Montenegro** has the region's second most institutionally developed formal structure after Serbia, yet its survey-measured involvement rate (18.9%) is the third lowest, and the percentage of CSOs having access to documents was the second lowest in the region. Reported consultations that met both effectiveness criteria was 7.1%, lower than the regional average. This discrepancy requires further analysis and monitoring to assess the inclusiveness of the formal design. Similarly, Serbia has the lowest overall involvement rate in the region (9.3% of respondents), despite having the most institutionally advanced formal participation mechanism. On the contrary, **Albania**, where CSOs are not formal Committee members, selection is unregulated, and there is no transparent criteria for participation, had the highest involvement rate in the region (38.0%) and the highest share of involved CSOs given adequate response time (63.2%). Interestingly, formal committee status and broad-based, survey-measured CSO engagement appear uncorrelated across the region.
- ➔ Despite the **Republic of North Macedonia's** ad hoc, invitation-based model of CSO inclusion in the RGF Committee - rather than guaranteed seats - its reported consultation rate (30.2%) and document-access rate (62.5%) in the survey were the second highest in the region. This warrants further monitoring and analysis to understand the relationship between formal seating status and inclusivity.
- ➔ **Türkiye** shows an inverse profile to most Western Balkans countries: the highest document-access rate of any country (85%) but the weakest response-time adequacy (15%). Since no formal committee architecture comparable to the RGF Monitoring Committees or informal NCoMeRs exist, given the suspended accession process, this likely reflects EUD civil society dialogue inclusion, rather than a structured government-led process.

Across the region, CSO involvement in EU-accession consultation is low and highly uneven. Although formal committee membership is an important inclusion indicator on paper, it is not necessarily a predictor of on-the-ground engagement: Serbia's advanced, voting-seat mechanism coincides with the region's lowest involvement rate, while Albania's unregulated, non-member framework yields the highest, much as the Republic of North Macedonia's ad hoc, invitation-based model outperforms Montenegro's formal permanent seats. Where no Committee met at all in 2025 (i.e. Kosovo, Bosnia and

Herzegovina), CSOs still reported meaningful consultation activity, suggesting engagement is shaped less by whether a formal RGF architecture exists than by the practical modalities (timing, document access, and follow-up) through which consultation is actually carried out. Türkiye adds a further data point to this picture: lacking any RGF-equivalent architecture given its suspended accession process, its EU Delegation-led consultation model produces the highest document-access rate in the dataset but the weakest response-time adequacy.

Sources

1. [Reform Agenda Update - Reform Monitor, 2nd Semester 2025, Albania](#)
2. [Commission approves Bosnia and Herzegovina's Reform Agenda - European Commission, Enlargement and Eastern Neighbourhood](#)
3. [Reform Agenda Update - Reform Monitor, 2nd Semester 2025, Montenegro](#)
4. [Republic of North Macedonia - Reform Agenda Update - 2nd Semester 2025 - WB Reform and Growth Monitor](#)
5. [Statement by the NCEU Intersectoral Working Group for Monitoring the Implementation of the Reform Agenda of the Republic of Serbia](#)



❖ Specific Objective 3: CSOs' capacities and resilience in carrying out their activities are strengthened.

In 2025 the picture remained **mixed but showed several important improvements** in formal governance, transparency and learning, against a still hostile and shrinking civic space. Most evidence comes from CSOs' self-reporting, so indicators capture whether internal policies and structures exist, not how well they are implemented.

Internal governance, accountability and transparency

Formal governance bodies became considerably more widespread: 88% of CSOs reported an independent and effective governing body with more than double the 40% recorded in 2024, though a broadened survey question limits comparability. Highest rates were in Bosnia and Herzegovina, Türkiye and the Republic of North Macedonia; lowest in Albania and Serbia. **Conflict-of-interest checks improved but are not yet standard** (57% regionally, strongest in Albania, Montenegro, Kosovo and Türkiye), with more than half of CSOs still relying on one-off procedures or none. **Organisational transparency remained low:** about 30% publish statutes, governance structure and governing-body members, what is similar to 2024 and below 2021 levels. **Financial transparency improved but remained constrained:** around 44% publish both funding sources and amounts; watchdog and rights-focused CSOs stay deliberately cautious to reduce risks of harassment, smear campaigns or administrative pressure.

Communication, consultation and organisational learning

Online communication is becoming more and more universal, with 100% of CSOs in every IPA beneficiary using at least one channel, with Facebook, Instagram and websites as the backbone. Media cooperation recovered to 38% (from 24% in 2024). Research, consultation and networking remained strong pillars: about four-fifths conducted at least one piece of research, 89% consulted stakeholders (95% including partnership-based engagement), and 84% belonged to at least one network. Cross-sectoral partnerships dipped slightly in formal terms (53% vs. 55%), but overall engagement with academia, social partners and the private sector reached 77%. Evaluation practice strengthened: 84% carried out at least one evaluation (up from 77%), largely project-level and likely donor-driven, and 74% now have an organisational strategy (up from 68%).

Diversified Funding, Fundraising and Human Resources Policies

Financial resilience modestly strengthened: 57% of donor-funded CSOs reported a diversified donor base (up from 54% in 2024 and 50% in 2021), strongest in Albania, Bosnia and Herzegovina and Serbia. EU funding, international CSOs and public authorities remain the dominant donors. Notably, **24% of CSOs now operate without any donor funding**. This is a sharp rise, especially in Montenegro and Türkiye, which may signal both autonomy or vulnerability. **HR frameworks remained partial but clearly**

improved: only some 2% have the full set of key HR policies, but the share with none at all dropped from about half to roughly a quarter. Safeguarding is the most widely adopted policy, redundancy the least; **gender-equality policies passed the halfway mark**, with high uptake among gender, LGBTIQ+, human rights, social inclusion and youth organisations.

Overall, despite an increasingly difficult environment, CSOs are gradually strengthening formal governance, strategic planning, conflict-of-interest checks, communication, funding diversification and financial transparency, while **persistent gaps remain in proactive disclosure, gender-equality mainstreaming, HR policies and the substantive implementation of accountability tools.**

Note on methodology: The majority of the data analysed under Specific Objective 3 derives from self-reporting by the participating CSOs themselves. The survey captures among others whether an organisation reports having a given policy, document, structure or practice in place; it does not, and cannot, measure the quality, depth, independence or actual application of these instruments. A reported gender equality policy, governing document, evaluation or strategy is recorded as present regardless of how robust, substantive or consistently implemented it is in practice. The figures in this chapter should therefore be read as indicators of formal uptake and self-declared practice, not as a measure of organisational effectiveness or of the substantive quality of the instruments concerned. This distinction is particularly important where high reporting rates coincide with persistent challenges in areas such as accountability, oversight and conflict-of-interest management, which the self-reported data alone cannot fully capture.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	4	4	4	4	4	4
2024	3	3	3	2	3	3	2
2023	4	3	3	3	3	3	3
2021	3	3	3	3	2	3	2

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	4	2	3	3	2	2	3
2024	2	1	2	1	1	1	1
2023	2	1	2	1	1	1	1
2021	1	1	2	1	2	1	1

Indicator 3.1.c: Proportion of CSOs that share relevant information on their organisation using means and channels that are accessible to all stakeholders in terms of publishing their statutes, governance structure and names of their governing body members

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	2	1	2	3	2	1	3
2024	1	2	1	2	2	1	3
2023	1	1	1	1	3	1	3
2021	2	2	2	2	2	1	3

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	3	3	2	3	3	3
2024	3	2	3	2	2	3	3
2023	3	2	3	2	2	2	3
2021	3	2	3	2	2	3	3

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	4	4	4	3	5	4	4
2024	4	4	4	4	4	4	3
2023	4	4	4	3	4	3	4
2021	4	3	4	3	5	4	3

In 2025, the overall picture of CSO internal governance across the region remained mixed, with formal governance structures becoming more widespread while practices related to independence, accountability and conflict of interest continued to face challenges in a number of countries. Compliance scores under this Specific Objective are generally higher than earlier assessment rounds since 2021. However, changes in the interpretation and formulation of survey questions for several key indicators mean that the 2025 results under this section are not directly comparable with previous years, which are cited below for reference only.

In 2025, the regional proportion of CSOs reporting that they have an **independent and effective governing body** increased to 88% of the surveyed organisations compared to 40% in 2024.

Proportion of CSOs that have an independent and effective governing body	
2025	88%
2024	40%
2023	51%
2021	45%

The proportion was highest in **Bosnia and Herzegovina** (97%), **Türkiye** (97%), and the **Republic of North Macedonia** (96%), and lowest in **Albania** (70%), followed by **Serbia** (79%). The performance under this indicator improved for all countries compared to the previous year, with particularly large increases in **Bosnia and Herzegovina**, **Montenegro**, the **Republic of North Macedonia** and **Türkiye**.

The 2025 survey question was reformulated to capture a broader range of governing bodies and governance documents; the current figures therefore indicate strengthened formal frameworks but should not be read as measured change from earlier years.

High reporting rates confirm that governing documents and independent bodies are now near universal among CSOs, but as this year's assessment did not verify whether paid staff sit as voting members of the governing body, accountability dimensions remain only partially captured.

In 2025, the proportion of **CSOs that checked potential conflicts of interest** with regard to the political, economic and personal relationships of the members of their governing body on a regular basis increased across the region, reaching a regional average of 57%.

Proportion of CSOs that regularly check potential conflicts of interest	
2025	57%
2024	15%
2023	18%
2021	15%

The highest proportion was reported in **Albania**, where 74% of CSOs carried out such checks at least every two years, followed by **Montenegro** (65%), **Kosovo** (60%) and **Türkiye** (59%). The lowest was recorded in the **Republic of North Macedonia** with 46%, **Bosnia and Herzegovina** and **Serbia**, both at 48%, where more than half of responding CSOs still relied on one-off procedures or did not conduct checks during the mandate. Since the 2025 survey question was broadened to capture general conflict-of-interest checks, which may take any form that the CSOs have been using, rather than limiting it only on annual signed declarations, the figures should be read on their own terms. Even so, the results show that regular conflict-of-interest checks are not yet standard across the sector, and that even in countries with relatively high formal governance scores, governing bodies often lack systematic mechanisms to identify and manage potential conflicts of interest throughout their term.

In 2025, **organisational transparency**, understood as sharing relevant information on statutes and governance structures through accessible communication channels, remained at a level comparable to 2024 and still missed the level reached in 2021. Across the region, around one-third of participating CSOs, 30%, reported that they published their statutes and governance structure on their website or other public platforms.

Proportion of CSOs that publish their governing document, governing body structure and names of governing body members	
2025	30%
2024	29%
2023	23%
2021	30%

The highest proportion of CSOs publicly sharing such information was reported in **Türkiye** with 45%, followed by **Montenegro** (43%), while the lowest levels were found in **Serbia** and **Bosnia and Herzegovina** (both 18%), then **Kosovo** (22%) and **Albania** (27%), where less than 1/3 of responding CSOs made their governance structures publicly available. Five countries recorded increases in the proportion of CSOs publishing this information compared to 2024, with **Montenegro** showing the most notable improvement (from 23% to 43%), while **Bosnia and Herzegovina** presented the sharpest decline (from 32% to 18%). Overall, the results suggest that although more CSOs use online communication channels, the practice of proactively disclosing governance information remains uneven and has not yet become standard across the sector.

In 2025, **gender equality in CSOs** remained challenging, although the proportion of organisations reporting that they have an organisational gender equality policy increased slightly compared to 2024. Across the region, just over half of participating CSOs, 52%, reported having such a policy, which is

higher than the 41% recorded in 2024 but still indicates that a significant share of organisations operate without a formal commitment to gender equality in their internal governance.

Proportion of CSOs that have an organisational gender equality policy	
2025	52%
2024	41%
2023	42%
2021	44%

The proportion of CSOs with an organisational gender equality policy was highest in the **Republic of North Macedonia**, at 65%, followed by **Kosovo** (56%), **Bosnia and Herzegovina** (53%), **Albania** (52%), and **Türkiye** (50%), while lowest in **Montenegro** (40%), followed by **Serbia** with 49% of participating CSOs reported having such a policy. Changes over time remained mixed: the **Republic of North Macedonia** recorded a substantial increase compared to the 34% reported in 2024, similar to **Bosnia and Herzegovina** (53% from 36%), **Kosovo** (56% from 46%), and **Türkiye** (50% from 43%); while **Serbia** saw a decline from 58% in 2024 to 49% in 2025. **Albania** also slightly increased to 52% from 50% in 2024, while **Montenegro** (40% in 2025 and 2024) recorded no change.

Across the seven countries, gender equality policies are most frequently found among organisations working on gender equality and LGBTIQ+ rights, human rights, social inclusion and youth. Especially in **Bosnia and Herzegovina**, the **Republic of North Macedonia**, **Serbia** and **Montenegro**, this policy also exists in CSOs working on governance-related areas such as rule of law, transparency, anti-corruption and labour rights. In contrast, humanitarian aid, consumer protection and some rural or technical sectors exhibit significantly lower levels of institutional gender equality policies.

In 2025, the proportion of participating CSOs that reported having an **organisational strategy document** remained high across the region and increased compared to 2024. Overall, nearly three-quarters of surveyed CSOs, 74%, stated that they had an organisational strategy, strategic plan or similar document, up from 68% in 2024. This confirms that strategic planning is increasingly becoming a common practice among CSOs, although a notable minority still operate without a formal strategic framework.

Proportion of CSOs that have an organisational strategy	
2025	74%
2024	68%
2023	68%
2021	66%

The highest proportion of CSOs with a strategy document was reported in **Albania**, where 88% of respondents indicated that they had an organisational strategy, followed by the **Republic of North Macedonia** (85%), **Kosovo** (77%) and **Türkiye** (72%); while the lowest proportion was in **Montenegro** (59%), followed by **Bosnia and Herzegovina** and **Serbia** (both at 67%). While 3 countries showed a considerable increase from last year: **Albania** increasing to 88% from 73%, the **Republic of North Macedonia** from 79% to 85%, and **Türkiye** with a 12% increase from 2024. While **Serbia** stayed more or less

the at the same proportion (67% in 2025 and 68% in 2024); **Bosnia and Herzegovina** (64% in 2025, 71% in 2024), and **Montenegro** (from 61% in 2024 to 59% in 2025) showed decreases in the proportion of CSOs reporting to have organisational strategies.

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	5	5	5	5	5	5
2024	5	5	5	5	5	5	5
2023	5	5	5	5	5	5	5
2021	5	5	5	5	5	5	5

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	5	5	5	5	5	5
2024	5	5	5	5	5	5	5
2023	5	5	5	5	5	5	5
2021	5	5	5	5	5	5	5

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

Not assessed.

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

In 2025, as in previous years, the prevalence of **online channels of communication** used by CSOs was virtually universal across the region. All participating CSOs reported using at least one online communication channel to communicate about their work, meaning that the proportion of organisations with at least one online channel reached 100% in every IPA beneficiary.

Proportion of CSOs having at least one online channel of communication	
2025	100%
2024	96%
2023	97%
2021	98%

While coverage was universal, the intensity and mix of online communication channels varied across countries. In **Albania** and **Bosnia and Herzegovina**, Facebook (98% in Albania and 93% in BiH) and Instagram (84% in Albania and 77% in BiH) remained the dominant platforms, alongside a high share of

organisations maintaining websites (77% in both). In **Kosovo**, Facebook (85%) was the most commonly used channel, followed by websites (63%) and Instagram (59%), while the use of YouTube (26%) and LinkedIn (22%) remained more limited. In **Montenegro** and the **Republic of North Macedonia**, Facebook (86% in Montenegro and 92% in the Republic of North Macedonia) and Instagram (86% in Montenegro and 70% in the Republic of North Macedonia) were reported as the leading online channels, with website use increasing compared to last year. In **Serbia**, Facebook (86%), Instagram (76%) and websites (75%) formed the core of CSO online communication, with growing use of messaging apps and YouTube, while in **Türkiye**, Instagram (100%) was the most widely used channel, followed by websites (74%), Facebook (73%) and messaging applications, and a significant share of organisations also reported using X (54%) and LinkedIn (48%).

In 2025, **cooperation with the media** increased across the region compared to previous years, reversing the earlier downward trend. The regional average reached 38%, indicating that a larger share of CSOs reported partnerships with the media.

Proportion of CSOs that cooperate with the media	
2025	38%
2024	24%
2023	29%
2021	32%

The highest level of cooperation with the media through partnerships was reported in **Serbia** (51%), followed by **Bosnia and Herzegovina** (47%), **Albania** (41%), and the **Republic of North Macedonia** (40%); while the lowest was in **Türkiye** (15%), followed by **Montenegro** (36%) and **Kosovo** (37%). While **Türkiye** was the only IPA beneficiary reporting a decrease in media partnerships with a 4% fall from 2024; all other countries reported an increase: **Serbia** showing a 21% increase, **Montenegro** 20%, **Albania** 18%, **Bosnia and Herzegovina** 17%, the **Republic of North Macedonia** 14% and **Kosovo** 3%.

In 2025, the survey question for this indicator was broadened to ask CSOs not only about partnerships but also about consultations with the media. When consultations are included, the proportion of CSOs engaging with the media is considerably higher in most countries, with more than half of respondents in several IPA beneficiaries reporting either partnerships or consultations. This methodological change suggests that while structured partnerships remain limited, a considerable proportion of CSOs interact with the media through consultative arrangements.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	3	2	4	4	3	3
2024	2	2	1	2	3	2	2
2023	2	2	2	2	3	1	2
2021	2	3	2	3	3	2	2

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	3	3	2	3	3	2	2
2024	2	2	2	2	2	2	1
2023	2	2	1	2	2	1	2
2021	2	2	2	2	2	2	2

Indicator 3.3.c: Degree of public trust in CSOs²⁰

Although the proportion of CSOs publishing their annual reports, financial statements, sources of funding and amounts received increased in 2025, this transparency and accountability measure is still not a broadly followed practice across the region.

In 2025, transparency regarding the publication of annual reports and financial statements improved across the region compared to previous years, although it still fell short of being a standard practice among CSOs. Just under half of participating CSOs, 49%, reported that they published both their annual report and financial statements via their website, in hard copy or on social media. This represents a clear increase compared to the regional averages of previous years and suggests that more organisations are taking steps to disclose key information about their activities and finances.

²⁰ Balkan Barometer 2025 report, as being the main source of this indicator used in previous years, was not published, this indicator was not assessed this year.

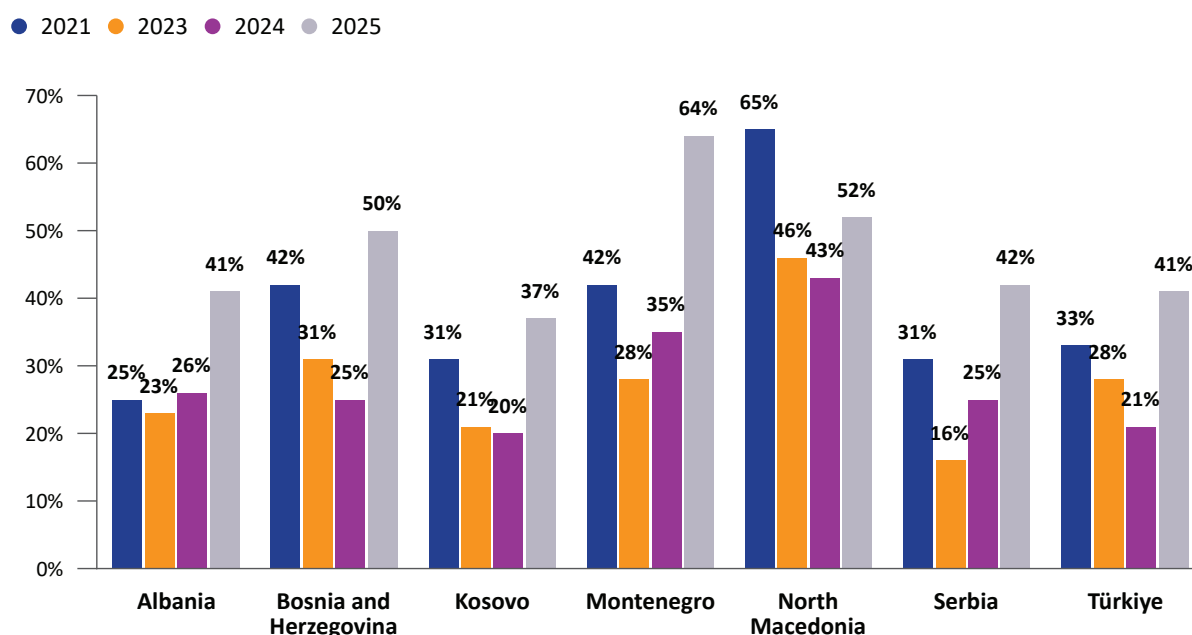
Proportion of CSOs published their annual report and financial statements

2025	49%
2024	28%
2023	27%
2021	36%

The highest rate of transparency was reported in the **Republic of North Macedonia** (65%) and **Montenegro** (64%), where around two-thirds of participating CSOs indicated that they published both documents, followed by **Bosnia and Herzegovina** (50%); while the lowest proportion was in **Kosovo**, with 37% of respondents did so, followed by **Albania** and **Türkiye** (both 41%), and **Serbia** (42%). All countries increased CSOs' proportion addressing this transparency and accountability measure: the highest increase is seen in **Montenegro** with 29% increase in one year, followed by **Bosnia and Herzegovina** (+25%), and **Türkiye** (+20%). However, more than half of the responding CSOs in **Albania, Kosovo, Serbia** and **Türkiye** did not make this information publicly available.

Reasons for not publishing annual reports or financial statements remained similar to previous years. Respondents frequently cited lack of capacity or resources, including not having a website, being small organisations with limited activities or funding, or considering the submission of reports to statutory regulatory bodies as sufficient. Some CSOs reported sharing reports only with members or donors, while others did not view public publication as necessary or in the public interest. As in earlier assessments, several organisations, particularly those working on sensitive issues, continued to avoid publicly disclosing detailed financial information as a way to mitigate risks of harassment, smear campaigns and political or administrative pressure.

Proportion of CSOs that publish annual reports and financial statements on website or in hard-copy

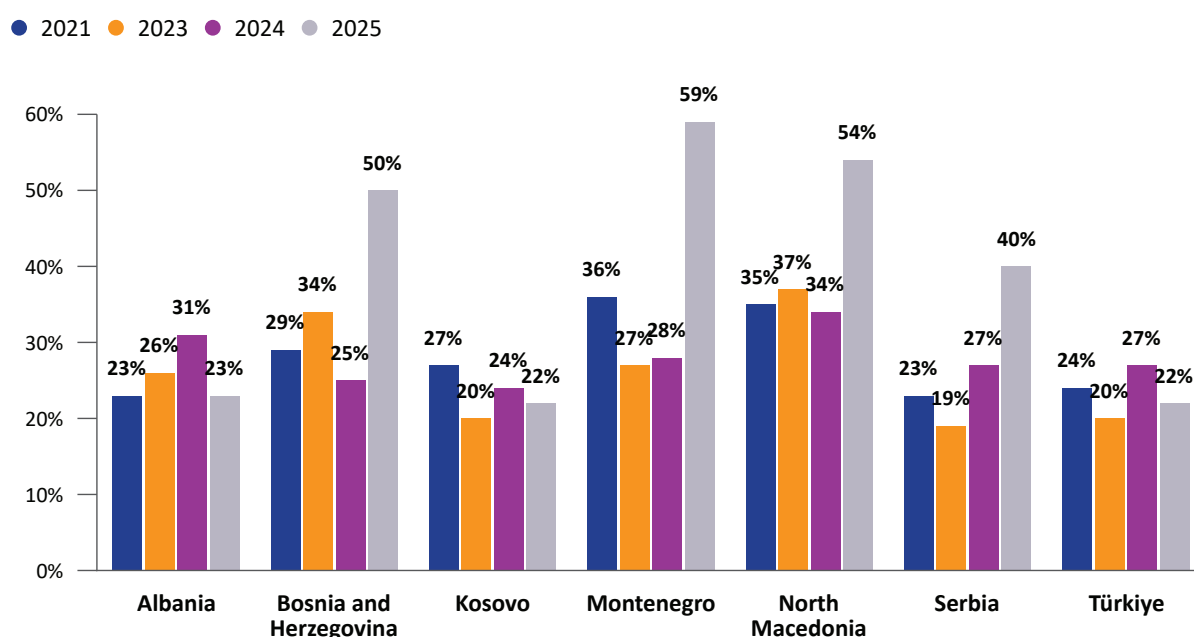


In 2025, the proportion of CSOs that published information on their sources of funding and the amounts received increased across the region but remained relatively low. Around two-fifths of participating CSOs, 44%, reported publishing both the sources of funding and the amounts received via their website or in hard copy, up from regional averages of previous years. This indicates a visible improvement in financial transparency, although detailed disclosure of funding still falls short of being a common practice among CSOs.

Proportion of CSOs published information on sources of funding and amounts received	
2025	44%
2024	26%
2023	27%
2021	27%

The proportion of CSOs publishing both sources of funding and amounts received was highest in countries such as **Albania** and **Montenegro** (both 59%), followed by the **Republic of North Macedonia** (54%) and **Bosnia and Herzegovina** (50%), where half or more of CSO respondents reported doing so. This was lowest in **Kosovo** with 22%, followed by **Türkiye** (24%), and **Serbia** (44%). Several countries, including **Albania** (+33%), **Bosnia and Herzegovina** (+25%), **Montenegro** (+31%), the **Republic of North Macedonia** (+20%) and **Serbia** (+13%), recorded marked increases in the share of CSOs disclosing both sources and amounts compared to 2024, while **Türkiye** showed a modest improvement (+4%), and Kosovo presented a slight decrease (-2%).

Proportion of CSOs publishing sources of funding and amounts received on website or in hard-copy



Despite these gains, financial transparency remains constrained by a range of factors. Many CSOs continue to share funding information primarily with members, donors or public authorities, rather than making it publicly available, citing limited capacity, small budgets, or concerns about security, public

targeting and administrative scrutiny. Organisations working on sensitive issues, including human rights and equality, often remain particularly cautious about disclosing detailed financial data, which contributes to the persistence of gaps in public transparency regarding funding sources and amounts received.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	5	5	4	5	5	5
2024	5	5	4	5	4	4	4
2023	5	5	4	4	5	4	5
2021	5	4	4	4	4	5	5

In 2025, CSO commitment to organisational learning remained very high across the region and increased compared to previous years. Overall, 84% of participating CSOs reported having carried out at least one evaluation of their work in the last year, up from regional averages of 77% in 2024, 80% in 2023 and 81% in 2021. This suggests that evaluation is becoming a more common practice among CSOs, though the survey captures only whether an evaluation took place - not its depth, independence or quality.

Proportion of CSOs that have carried out an evaluation of their work	
2025	84%
2024	77%
2023	80%
2021	81%

The proportion of CSOs carrying out evaluations was highest in **Albania**, 88%, followed by **Kosovo** at 86%, the **Republic of North Macedonia** (85%), **Bosnia and Herzegovina** (83%), **Serbia** and **Türkiye** (both 82%), and **Montenegro** being the lowest where 80% of participating CSOs stated that they had conducted at least one evaluation. Compared to 2024, most countries recorded increases, with **Kosovo** and the **Republic of North Macedonia** showing particularly notable rises (+15% both), while **Montenegro** saw a considerable decrease of 6%, and **Bosnia and Herzegovina** a slight decrease from 84% to 83%.

As in previous years, project-level evaluations remained the most frequent form of assessment in all IPA beneficiaries, reported by a clear majority of CSOs, with evaluations of strategies and internal processes carried out by a smaller share. Around one-sixth of participating organisations across the region stated that they did not carry out any evaluation in 2025, citing reasons such as limited organisational capacity and resources, absence of project-based activities, or a perceived lack of necessity. These

findings suggest that, while evaluation practices are well established, they remain closely linked to project implementation and donor requirements rather than to systematic organisation-wide learning.

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	5	4	4	4	4	5
2024	5	4	5	4	4	4	4
2023	5	5	4	5	4	4	5
2021	5	4	5	4	4	5	5

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	5	5	5	5	5	5
2024	5	5	5	5	5	5	5
2023	5	5	5	5	5	5	5
2021	5	5	5	5	5	5	5

In 2025, the proportion of CSOs whose work was based on evidence generated through research remained high and broadly in line with previous years. Across the region, 82% of participating CSOs reported that they used research to underpin their activities, compared to 80% in 2024, 82% in 2023 and 83% in 2021. This confirms that evidence-based work continues to be a common practice among CSOs in the IPA beneficiaries.

Proportion of CSOs whose work is based on evidence generated through research

2025	82%
2024	80%
2023	82%
2021	83%

The highest rate of research use was reported in **Bosnia and Herzegovina**, where 93% of participating CSOs stated that their work was based on research, followed by **Türkiye** (86%), **Albania** and **Serbia** (both 80%), **Montenegro** (79%), **Kosovo** (78%) and the lowest in the **Republic of North Macedonia** at

75%. Two countries increased this proportion: Bosnia and Herzegovina (+19%) and Türkiye (+8%), while the sharpest decline was seen in Albania (-13%), followed by Kosovo and the Republic of North Macedonia with a 5% decrease compared to 2024.

At the same time, almost one-fifth of participating CSOs (18%) reported not having carried out any research in 2025, a slight increase compared to the 15% recorded in 2024. Reasons cited included lack of capacities and resources, limited programme activities during the year or a perceived absence of need to conduct research. These findings suggest that while evidence-based approaches are well established across the sector, they remain less accessible to smaller organisations with constrained resources, and continued support is needed to strengthen research capacity among CSOs.

With regard to stakeholder consultation, 89% of respondents stated that they carried out at least one consultation with people who had a stake in their work in the course of 2025, slightly lower than the levels recorded in 2023 and 2024 (94% and 93%, respectively), but still considerably higher than in 2021 (81%). At beneficiary level, the lowest consultation rate with stakeholders was recorded as 83% in Bosnia and Herzegovina and Montenegro, while the highest was 96% in Türkiye. It was 85% in Albania, 86% in Serbia, 89% in Kosovo and 92% in the Republic of North Macedonia.

Proportion of CSOs whose work is informed through stakeholder consultation	
2025	89%
2024	93%
2023	94%
2021	81%

In 2025, the survey question related to this indicator was broadened to ask not only about consultations but also about partnerships with stakeholders. An additional 6% of CSOs reported engaging with stakeholders through partnership arrangements, meaning that overall engagement with stakeholders (through consultation or partnership) was higher than the consultation-only figure used for comparison with previous years (89% + 6% = 95%). This methodological change partially explains the high levels of reported engagement and indicates that, beyond formal consultation processes, a growing number of CSOs interact with stakeholders through more structured partnership forms as well.

In 2025, members remained the stakeholder group consulted most frequently across the region, with 66% of participating CSOs reporting that they consulted their members (62% in 2024). Local communities or constituencies were the second most frequently consulted group, at 60% (59% in 2024), followed by local authorities, consulted by 53% of CSOs (52% in 2023). These proportions are broadly similar to those recorded in 2024, confirming that organisations' own members, local communities and constituencies and local authorities continue to be the stakeholders most consulted by responding CSOs in the region.

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

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

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

In 2025, CSO participation in networks remained very high across the region and increased compared to previous years. Overall, 84% of participating CSOs reported taking part in at least one local, national or international CSO network, up from 79% in 2024, 80% in 2023 and 72% in 2021. This confirms that networking continues to be one of the stronger areas of CSO capacity in IPA beneficiaries.

Proportion of CSOs taking part in networks	
2025	84%
2024	79%
2023	80%
2021	72%

At the beneficiary level, **Albania** had the highest percentage of network membership with 96%, followed by **Kosovo** and the **Republic of North Macedonia** (85%), **Montenegro** (84%), **Bosnia and Herzegovina** (83%), **Serbia** (80%) and lastly **Türkiye** with 72% of responding CSOs reported having network membership. In 2025, **Kosovo** CSOs increased their membership by 9%, followed by **Albania** (+6%), **Montenegro** and the **Republic of North Macedonia** (+4%). **Bosnia and Herzegovina** maintained its proportion, while **Serbia** (-3%) and **Türkiye** (-1%) saw slight declines in network memberships. The proportion of CSOs with no network affiliation decreased to 17% from 21% in 2024, with non-membership being highest in **Türkiye** (28%) followed by **Serbia** (20%).

Across the region, national networks remained the most common form of affiliation, with an average of around 62% of CSOs reporting membership, followed by international networks at 49% and local networks at 34%. National-level networking came to be prominent in all countries other than **Montenegro**, where international-level membership was the highest. Local-level membership was the lowest across the region.

In 2025, cross-sectoral partnerships between CSOs and academia, social partners and the private sector remained present across the region but showed a slight decline when compared with previous years. On average, 53% of CSOs reported engaging in at least one partnership with these stakeholders, down from 55% in 2024 and 57% in 2023. However, the revised 2025 methodology introduced consultation as a separate category of engagement: in addition to formal partnerships, a further 24% of CSOs reported consulting with at least one of these stakeholders. Taken together, this indicates that overall cross-sectoral engagement remains substantial (77%), even if the share of organisations reporting formal partnerships alone has decreased.

Proportion of CSOs engaged in cross-sectoral partnerships	
2025	53%
2024	55%
2023	57%
2021	Data not available

At the beneficiary level, **Kosovo** had the highest percentage of cross-sectoral partnerships with 63%, showing a 10% increase from 2024. **Albania** came second with 59% partnership being reported, but with a 6% decrease from 2024. **Montenegro** followed with 57% of responding CSOs reporting cross-sectoral partnerships, with the sharpest increase of 16% from 2024. **Serbia** had 56% of partnerships being reported and a 6% increase from 2024. The **Republic of North Macedonia** (48%), **Türkiye** (46%), and **Bosnia and Herzegovina** (43%) were the countries with the majority of CSOs reporting no such partnership. Among these 3 countries, Türkiye showed a sharp decline of 14% from 2024, followed by the Republic of North Macedonia with a 12% decrease.

The fact that, other than **Kosovo, Montenegro and Serbia**, all other countries reported declines in cross-sectoral partnerships, may be explained by the addition of consultation as a separate engagement channel in 2025. In several countries, including **Türkiye** (45%), the **Republic of North Macedonia** (25%), **Bosnia and Herzegovina** (30%), **Albania** (23%), substantial proportions of CSOs reported consulting with the relevant stakeholder groups without necessarily entering into formal partnerships.

SO 3.7. CSOs have a diversified funding base

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	4	4	3	3	3	4	3
2024	3	3	3	3	3	3	3
2023	3	3	3	4	3	4	4
2021	3	3	3	2	3	3	3

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	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	5	5	3	3	4	4	5
2024	3	4	3	3	4	4	4
2023	4	4	3	3	4	4	5
2021	4	4	4	3	5	4	5

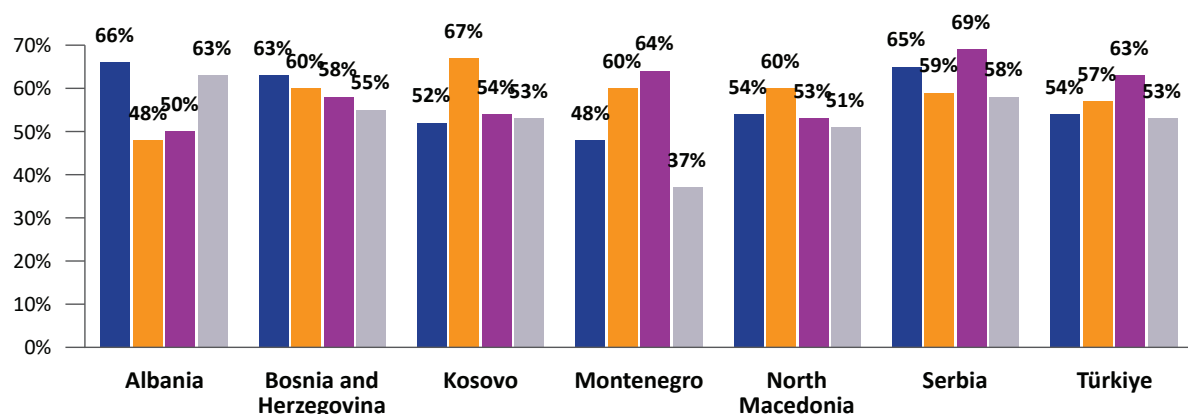
In 2025, participating CSOs that received donor funding reported a slightly higher rate of diversification of sources of donor income than in previous years. Across the region, 57% of participating CSOs reported that no single donor type contributed more than 50% of their income, compared with 54% in 2024, 55% in 2023 and 50% in 2021.

Proportion of CSOs with diversified sources of donor income	
2025	57%
2024	54%
2023	55%
2021	50%

The most diversified funding bases were reported in **Albania, Bosnia and Herzegovina** and **Serbia**, where 66%, 63% and 65% of CSOs respectively had no dominant donor providing more than half of their annual budget. At the other end of the range, **Montenegro** and **Kosovo** recorded lower levels of diversification, with 48% and 52% of CSOs respectively reporting diversified donor income, while the **Republic of North Macedonia** and **Türkiye** reported intermediate levels at 54%.

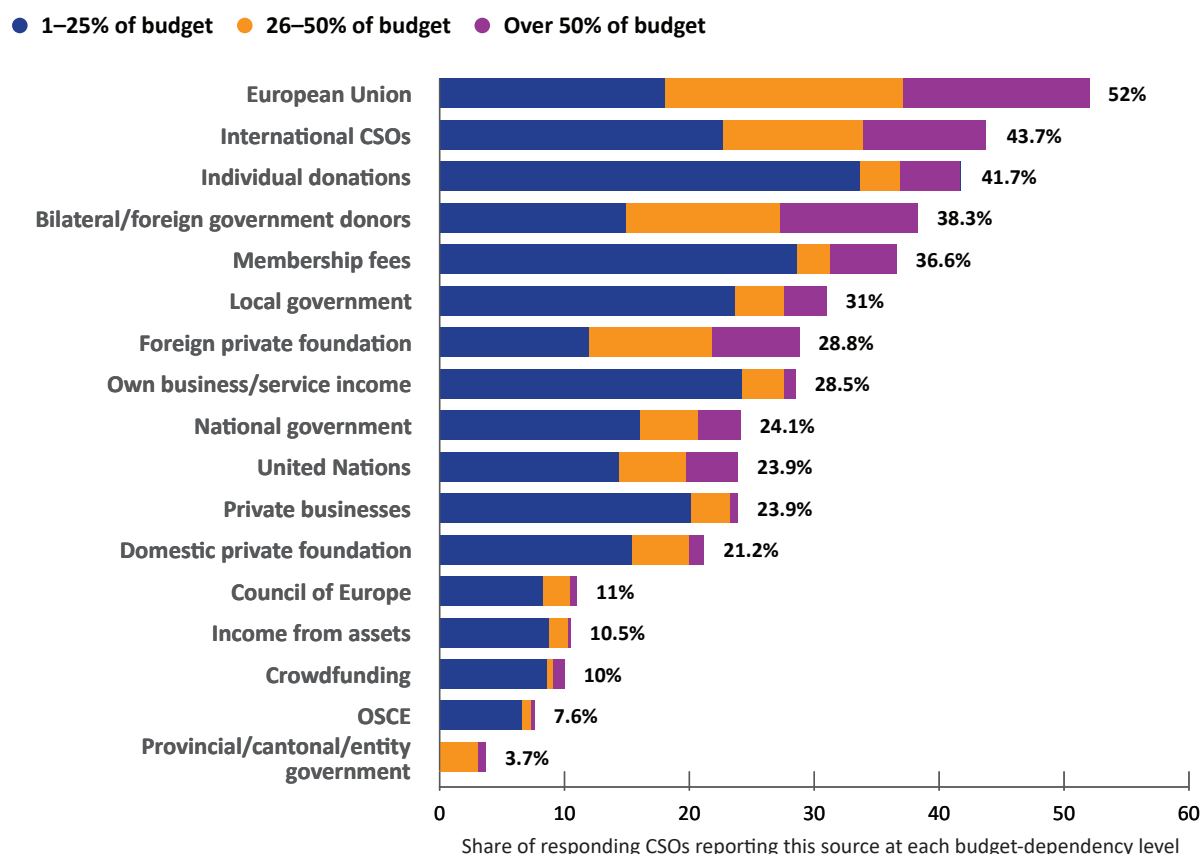
Proportion of CSOs whose sources of donor income are diversified

● 2025 ● 2024 ● 2023 ● 2021



In terms of specific donor types, the EU (European Commission), international CSOs and public authorities remained the most common sources of funding. Regionally, 52% of CSOs reported receiving funding from the EU, 44% from international CSOs, 38% from bilateral donors (i.e., foreign government embassies and/or their development agencies), 31% from local governments and 24% from national governments, followed by foreign private foundations (29%) and domestic private foundations (21%). As the following graphic shows, across the region, funding from the EU constitutes a majority of an organisation's budget (15% report EU funding as 50%+ of their budget, the highest share of any source).

Funding Sources of Responding CSOs — 2025 Budget Dependency

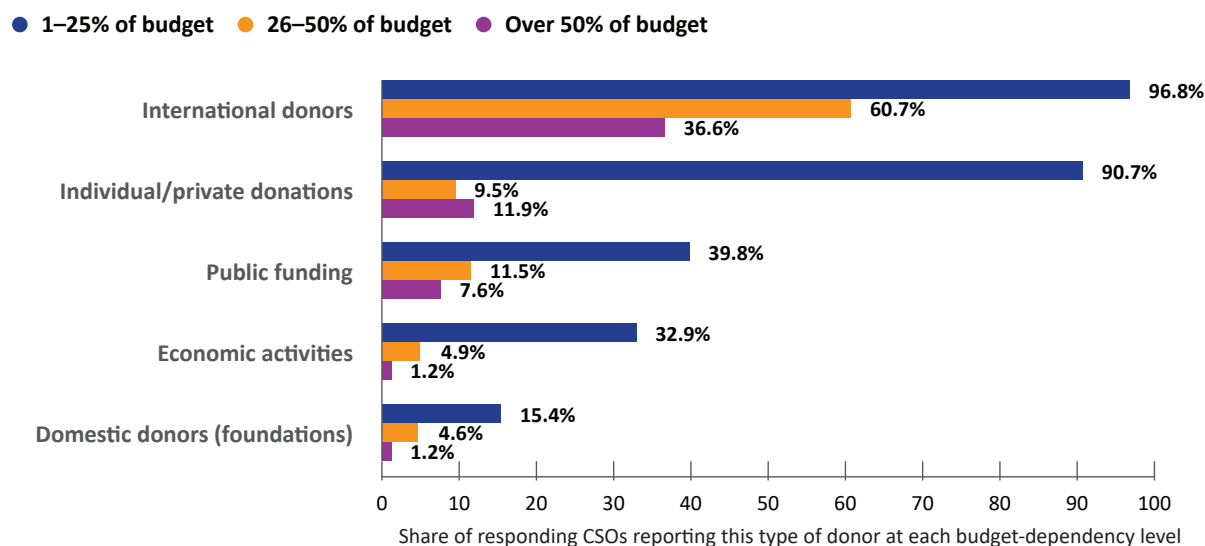


CSOs in the seven IPA beneficiaries largely depend on international funding, where 97% of the responding CSOs report receiving at least some share of their 2025 budget from international sources, and over a third (38%) depend on international donors for more than half their budget, representing a far exceeding reliance on any other funding type. Individual IPA beneficiary level data broadly confirm the regional pattern of international-donor dominance in **Albania**, **Montenegro** and the **Republic of North Macedonia**, where the European Union remained the single most widely used funding source (66%, 60% and 71% of CSOs respectively reporting some EU funding), with the **Republic of North Macedonia** the most EU-dependent country in the region at 23% relying on it for over half their budget.

By contrast, as can be seen on the following graphic, public funding is comparatively limited: while 59% of CSOs receive some government funding (local, provincial/entity, or national), only 8% depend on it for over half their budget, with most public funding concentrated in the lowest tier (1-25% of budget), indicating it functions as supplementary rather than core financing. Domestic private foundations were reported by 21% CSOs as a funding source, underscoring the limited depth of domestic philanthropy in the region. Across the region, Individual/private donations and CSOs' own economic activities remain

widespread but generally minor contributors, rarely accounting for a majority of any single organisation's budget.

Type of Donor/Fundraising — 2025 Budget Dependency



The regional pattern of international-donor dominance holds most clearly in **Albania, Montenegro, the Republic of North Macedonia and Serbia**, where international donors remain the leading funding type by a wide margin. **Albania** stands out with 66% of responding CSOs relying on international donors for over half their budget, nearly double the regional average (38%) and the highest concentration in the region. **Serbia** shows the most “average” profile in the region: international donors have the second-highest prevalence of any country, yet majority-level dependence (36%) sits almost exactly at the regional benchmark, indicating broad access to international funding without Albania’s degree of concentration. **Kosovo** and **Bosnia and Herzegovina** show a more balanced profile, where international donors still lead, but public funding is also prominent alongside them, most strikingly in **Kosovo**, where 30% of responding CSOs depend on public funding for over half their budget, nearly four times the regional average (8%) and far above any other IPA beneficiary. **Türkiye** is the only IPA beneficiary where individual/private donations overtake international donors as the leading funding type, where international-donor majority-dependence (25%) is the lowest.

Taken together, these results indicate that although diversified funding is becoming more common in the region, many CSOs still depend heavily on public and international donors, with concentration risks persisting where one donor type provides more than half of an organisation’s budget.

The proportion of CSOs operating without donor funding was broadly the same as 2024 and well above the levels recorded in 2023 and 2021. In 2025, 24% of CSOs in the region reported receiving no donor funding, compared with 25% in 2024, 12% in 2023, and 14% in 2021.

Proportion of CSOs receiving no donor funding

2025	24%
2024	25%
2023	12%
2021	14%

At the beneficiary level, the share of CSOs with no donor funding remained relatively low in **Albania** (5%), **Bosnia and Herzegovina** (7%), **Kosovo** (7%), the **Republic of North Macedonia** (8%) and **Serbia** (11%). This was slightly higher in **Montenegro** with 13%, and considerably higher in **Türkiye**, where 35% of CSOs stated that they did not receive donor funding. These figures suggest that while donor-funded activity continues to play a central role in the work of many CSOs, a significant minority operate either primarily with non-donor income or with very limited external support.

In 2025, CSOs across the region continued to raise funds from sources other than donors, with a slight increase compared to 2024 and 2023. Overall, 70% of participating CSOs reported securing income from at least one non-donor source, up from 69% in 2024 and 66% in 2023, though still slightly below the 73% recorded in 2021. This confirms that self-generated and community-based income remains an important complementary pillar of CSO financing alongside project-based donor funding.

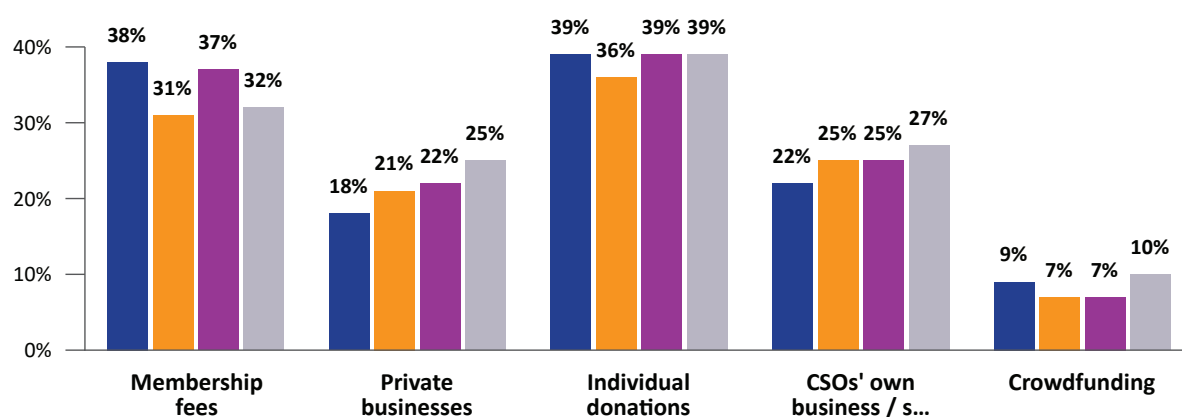
Proportion of CSOs raising funds from sources other than donors

2025	70%
2024	69%
2023	66%
2021	73%

Non-donor income was most widespread in **Türkiye**, where 89% of CSOs reported raising funds from sources other than donors, with an increase of 9% since 2024, and the highest proportion in the region. **Bosnia and Herzegovina** followed with 83%, then **Serbia** with 78%, both continuing an upward trend compared to previous years. Despite a 9% drop from 2024, the **Republic of North Macedonia** (65%) came next in line. **Kosovo** and **Montenegro** increased the proportion of CSOs raising funds from non-donor sources, both having 59% in 2025. The lowest score for this indicator was in **Albania**, where, despite an increase of 7%, it lay at the bottom of the list with 57% of CSOs reporting raising funds from at least one non-donor source.

Proportion of CSOs that raise funds from different sources

● 2021 ● 2023 ● 2024 ● 2025



Across the region, individual donations were the most common non-donor source, reported by 39% of CSOs, followed by membership fees (32%), income from the organisation's own business or services (27%), and funding from private businesses (25%). Income from assets and crowdfunding remained relatively limited, each reported by around 10% of CSOs.

At the beneficiary level, membership fees were the most reported fundraising source in the **Republic of North Macedonia** (29%) and **Türkiye** (63%); individual donations came first in **Albania** (32%), **Bosnia and Herzegovina** (53%), **Kosovo** (37%) and **Montenegro** (33%). With regard to the sources that were used least, income from assets was the least in **Bosnia and Herzegovina** (7%) and in **Serbia** (8%), while crowdfunding came the last in **Albania** (3%), **Kosovo** (11%), **Montenegro** (4%), the **Republic of North Macedonia** (4%) and **Türkiye** (9%).

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

Indicator 3.8.a: Proportion of CSOs that employ staff

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

Year	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	Republic of North Macedonia	Serbia	Türkiye
2025	1	1	1	1	1	1	1
2024	1	1	1	1	1	1	1
2023	1	1	1	1	1	1	1
2021	1	1	1	1	1	1	1

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

Not assessed

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

Not assessed

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

Not assessed

In 2025, the majority of CSOs in the region reported employing paid staff, with employment levels higher than in most previous years. Across the seven participating countries, 72% of CSOs stated that they had at least one paid employee, compared with 64% in 2024, 74% in 2023 and 71% in 2021. The remaining 28% operated without paid staff, down from 34% in 2024.

Proportion of CSOs that employ staff	
2025	72%
2024	64%
2023	74%
2021	71%

Beneficiary data show considerable variation in staffing patterns. **Albania** and **Kosovo** reported the highest proportions of CSOs employing paid staff, at 94% and 89% respectively, followed by **Montenegro** (77%), the **Republic of North Macedonia** and **Bosnia and Herzegovina** (both with 69%). **Serbia** and **Türkiye** the shares were lower, at 58% and 48% respectively, with 42% of CSOs in **Serbia** and more than half of CSOs in **Türkiye** operating without paid employees. **Serbia** experienced the sharpest drop of 12%, while **Kosovo** had the biggest increase of 18%. These differences reflect broader disparities in organisational size and funding, as well as geographic and thematic factors highlighted in the IPA-beneficiary analyses.

The distribution of team sizes also points to a sector dominated by small-staffed organisations, alongside a smaller group of more institutionalised CSOs. Regionally, 49% of CSOs employed between one to five staff members, up from 37% in 2024, while 34% employed six or more staff, compared with 27% in 2024. In **Montenegro** and **Kosovo**, most organisations with paid staff reported small teams, with 72% and 49% respectively employing between one to five staff members; in **Bosnia and Herzegovina** and the **Republic of North Macedonia**, a significant share of CSOs reported larger teams, with notable proportions employing six to ten staff members or more than ten. In **Türkiye** and **Serbia**, the share of CSOs with larger teams remained more limited, reflecting continued constraints in employment capacity despite modest improvements compared to 2024.

In 2025, the comprehensive adoption of organisational human resources policies remained limited across the region, but showed a slight improvement compared to previous years. On average, 2% of participating CSOs reported having all of the key HR policies tracked by the indicator in place, up from 1% in 2024. At the beneficiary level, only small shares of CSOs in **Albania**, **Kosovo**, **Montenegro**, the **Republic of North Macedonia** and **Türkiye** reported having the full set of policies, while no CSOs did so in **Bosnia and Herzegovina**. This confirms that fully developed HR systems are still the exception rather than the rule in CSOs.

Proportion of CSOs with no human resource policies	
2025	26%
2024	51%
2023	41%
2021	73%

At the same time, the proportion of CSOs without any HR policies decreased markedly. In 2025 only 26% of CSOs in the region reported having none of the listed policies. Beneficiary data reflect this downward trend: in **Montenegro**, the share of CSOs with no HR policies fell to 31% from 44% in 2024

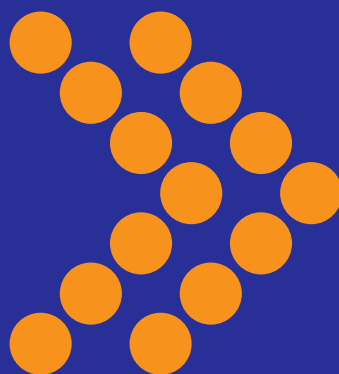
and more than half in 2023; in **Kosovo**, 11% of organisations reported having no policies at all; and in **Albania**, “no-policy” organisations were only 10%. In **Bosnia and Herzegovina** this was 23%, followed by **Türkiye** (32%), the **Republic of North Macedonia** (33%), and **Serbia** (34%). These results suggest that while only a small minority have comprehensive HR frameworks, an increasing number of CSOs are nonetheless putting in place at least some basic HR rules and procedures.

Looking at individual policies, safeguarding of children and vulnerable adults emerged as the most widely adopted HR measure in 2025, with a regional average of 55% of CSOs reporting such a policy. Diversity, equality and inclusion (DEI) policies followed with 40%, bullying and harassment policies with 33%, recruitment policies with 30% and performance appraisal policies with 26%. This marks a shift in emphasis compared to 2024, when DEI policies ranked first at 36%, and recruitment and bullying policies each stood at 27%. Beneficiary-level data illustrate these patterns: in **Bosnia and Herzegovina** and **Kosovo**, safeguarding policies were reported by around half or more of CSOs; in **Albania** and **Türkiye**, DEI and safeguarding policies were among the most common; and in several countries bullying and harassment policies were more frequent than core employment instruments such as recruitment or performance appraisal policies. In all countries, redundancy policies were the least implemented policy.



List of Annexes

- Annex 1 - Albania Report**
- Annex 2 - Bosnia and Herzegovina Report**
- Annex 3 - Kosovo Report**
- Annex 4 - Montenegro Report**
- Annex 5 - Republic of North Macedonia Report**
- Annex 6 - Serbia Report**
- Annex 7 - Türkiye Report**
- Annex 8 - General CSO Survey Questionnaire**
- Annex 9 - Specialised CSO Survey Questionnaire**
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