



EU TECHNICAL ASSISTANCE
TO CIVIL SOCIETY ORGANISATIONS
IN THE WESTERN BALKANS AND TÜRKIYE

DG ENEST Guidelines for
EU Support to Civil Society
in the Enlargement Region
2021–2027

2024 Assessment

Country Report for
BOSNIA AND HERZEGOVINA



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Abbreviations and Acronyms

Acronym/Abbreviation	Explanation
AML/CTF	AntiMoney Laundering and Countering the Financing of Terrorism
BAM (or KM)	Bosnia and Herzegovina Convertible Mark
BiH	Bosnia and Herzegovina
Brčko District	Selfgoverning district in Bosnia and Herzegovina
CIVICUS	International alliance for civil society
CM/Rec(2007)14	Council of Europe Recommendation (CM/Rec(2007)14)
CSO	Civil Society Organization(s)
DG ENEST	Directorate General for Enlargement and Eastern Neighbourhood
ECtHR	European Court of Human Rights
eKonsultacije	Electronic consultation platform used by public authorities in BiH
EU	European Union
EU TACSO 3	EU Technical Assistance for Civil Society Organisations phase 3 (project)
EU4CS	European Union for Civil Society (project)
FATF	Financial Action Task Force
FBiH	Federation of Bosnia and Herzegovina
HJPC	High Judicial and Prosecutorial Council
IFJ	International Federation of Journalists
IPA	Instrument for Preaccession Assistance
LGBTIQ	Lesbian, Gay, Bisexual, Transgender, Intersex, and Queer
MoJ	Ministry of Justice (of Bosnia and Herzegovina)
ODIHR	OSCE Office for Democratic Institutions and Human Rights
OSCE	Organization for Security and Cooperation in Europe
RCC	Regional Cooperation Council
RS	Republika Srpska
RSF	Reporters Without Borders
VAT	Value Added Tax
X	X platform (social media service formerly known as Twitter)

Introduction to Annex

This country analysis is an Annex to the DG ENEST Guidelines for EU Support to Civil Society 2021–2027: Assessment Report 2024.

This assessment provides evidence for the situation against the Guidelines' indicators for 2024.

This annex provides a summary of the evidence for assessment of the situation in Bosnia and Herzegovina against each of the 59 indicators in the Guidelines. This annex should be read in conjunction with the main report, which is available on the tacso.eu website.

Methodology

The analysis is based on the data collected from primary and secondary sources, including surveys of CSOs and public officials, legal analysis, reports produced by CSOs, national human rights institutions, governments, and other sources.

The survey of public officials was run between 10 February and 3 March 2025. The aim of the survey was to collect the perspectives on specific indicators of selected public officials who, in their work, engage most closely with CSOs. The survey consisted mostly of closed questions and was anonymous. The survey elicited seven valid responses. Responses were received from officials working for the state government, the government of the Federation of BiH, and at the cantonal level. Representatives of relevant ministries from the Republika Srpska did not respond to the survey.

The assessment of CSO capacity and resilience was based on a survey run between 19 January and 10 February 2025. The CSO survey was circulated broadly and received 120 valid responses from Bosnia and Herzegovina, similar to the 2023 level (in 2023 it was 116, and in 2021 it was 103). The survey was open to any CSOs willing to participate. It was disseminated through various channels with the support of CSOs, CSO networks, EUD, embassies, UN agencies, international organisations, and the National Resource Centre for CSO collaboration, and public institutions, to make sure that the outreach covered a broad variety of CSOs. The relevance of responses was ensured at the data-cleaning stage, when respondents who indicated that they did not belong to the target group were filtered out.

The composition of the sample has largely remained the same across the three years of assessment.

The highest percentage of respondents who filled in the CSO survey - 36% - were senior officials within organisations (in 2023 it was 65%, in 2021 it was 55%). More than half of the respondents, 58%, identified as women (57% in 2023 and 2021). A majority of the respondents, 57%, were aged 51 or older (30% in 2023), whilst 23% were aged between 41 and 50.

Among the CSOs who participated in the survey in 2024, 31% were operating at the local level, and 20% were based in the capital, Sarajevo Canton (35% in 2023), with 18% based in Banja Luka, as the second biggest city in BiH. From the Federation of Bosnia and Herzegovina entity, 63% of CSOs participated in the CSO survey, and from the Republika Srpska entity, 34%.

Among the respondents, 19% identified as belonging to a community, minority or marginalised group (23% in 2023, 35% in 2021).

Most of the participating CSOs were established over the past two decades – 37% between 2001–2010, and 26% between 2011–2021. Some 22% were established between 1991 and 2000.

All responses came from officially registered organisations – there were no responses from non-registered organisations. Out of all the answers, 89% were from bodies registered as citizen's associations, and 8% as foundations.

More than half of participating CSOs, 52%, work at the local level, 41% work regionally, within the country/sub-nationally/at entity-level, 38% work at the national level, 24% work internationally, and 31% work only locally.

The highest proportion of CSOs participating in the survey, 30%, work on human rights (compared to 26% in 2023), 21% work on social inclusion, 15% on the rights of persons with disabilities, and 14% on gender equality and LGBTIQ.

More than half of participating CSOs, 57%, were small organisations with 1–10 permanent, full or part-time staff and volunteers working at the time of the survey; 23% engaged between 11 and 20 persons, and 8% engaged 21 or more staff and volunteers.

Whilst 1% of CSOs did not have any annual turnover (3% in 2023), 24% of CSOs had an annual turnover of up to EUR 25,000. Another 18% of CSOs responded with figures between EUR 50,000 and EUR 100,000, whilst 17% registered under EUR 5,000.

A focus group discussion was held with CSOs who had participated in consultation meetings on the civil society strategy development in BiH. This was held on 4 February 2025. Eight CSO representatives participated (2 men and 6 women). A further focus group discussion was held with CSOs who did not participate in consultation meetings on the civil society strategy development, and this was held on 5 February 2025. Four CSO representatives participated (1 man and 3 women). Two interviews were held on 6 February 2025 with two members of the Advisory Body of the Council of Ministers of BiH for Cooperation with Non-Governmental Organisations in 2024. The CSO representatives consisted of one man and one woman.

Assessment against indicators

The data collected informed the analysis of the situation in 2024 in Bosnia and Herzegovina against the indicators under review. The indicators were reviewed and assessed using the same methodology as in the previous years.

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 standards.

The remaining indicators provide an overview of year-on-year trends building on the baseline established in 2021.



Specific Objective 1

A conducive environment for civil society to carry out its activities is in place.

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

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

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

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	4 – meets most standards

Although the laws guaranteeing the rights to freedoms of association, of peaceful assembly and of expression were not changed in 2024, several developments took place which had a significant impact on the enjoyment of these rights.

Freedom of Association

Having passed the first reading in the National Assembly of Republika Srpska, the Draft Law on the Special Registry and Publicity of the Work of Non-Profit Organisations targeting civil society organisations as ‘foreign agents’ was withdrawn by the entity government in May 2024. Even though it was withdrawn, the uncertainty associated with the adoption of the controversial draft law had adverse effects on the enjoyment of the right to freedom of association by CSOs in the Republika Srpska entity. On 28 May, 2024, the President and the National Assembly of Republika Srpska stated for the media and their social networks channels, that the proposal of the law, after being agreed upon, would be returned to the procedure in due course.¹

Another example that shows the situation of uncertainty and its adverse effects was the adoption of the Draft Law on Amendments to the Criminal Code of Republika Srpska, which replaces the words “gender identity” with the words “other personal characteristic”. This amendment affected Articles 123, 139, and 359 of the Republika Srpska Criminal Code, and was adopted on the 11th session held on 30 October 2024. This could negatively affect human rights defenders and civil society organisations that promote and protect the rights and equality of persons of different gender identities by reducing the scope of application of Article 139(2), which specifically applies to individuals and organisations advocating for equality.

The legislative framework governing freedom of association in BiH during 2024 remained consistent with international human rights norms and was generally respected. However, there is room for improvement of the laws on associations and foundations Rec(2007)14 on the legal status of NGOs in Europe². This

¹ ‘Dodik najavio vraćanje zakona o nvo i stranim agentima u proceduru’, N1 Television, 29 May 2024

² Recommendation CM/Rec(2007)14, The Council of Europe.

may include simplifying further regulatory requirements and ensuring that those requirements are not unduly burdensome to associations. These requirements include complex legal requirements, administrative procedures and regulatory frameworks, especially in the complex governance structure of BiH.

The year was, however, overshadowed by the uncertain situation regarding the adoption of the suspended the Law on the Special Register and Publicity of Non-Profit Organizations in Republika Srpska. CSOs operated in anticipation of the adoption of a law that would limit their activities and prevent them from registering in that entity. The law was adopted in February 2025, after the reference period for this report.

On March 7, 2025, the Constitutional Court of Bosnia and Herzegovina held an extraordinary plenary session via electronic means, at which it decided on the requests for interim measures in cases no.: U-6/25 – applicant Kemal Ademović, Deputy Chairman of the House of Peoples of the Parliamentary Assembly of Bosnia and Herzegovina, U-7/25 – applicant Denis Bećirović, Member of the Presidency of BiH, and U-8/25 – applicant Denis Zvizdić, Chairman of the House of Representatives of the Parliamentary Assembly of BiH. On 29 and 30 May 2025 the BiH Constitutional Court shall decide on the merits of the case.

The Constitutional Court temporarily suspended the Law on the Special Register and Publicity of Non-Profit Organizations.³ It was determined that the decision shall enter into force immediately and shall produce legal effects from the date of entry into force of the cited law until the adoption of the final decision of the Constitutional Court on the submitted request.

The Constitutional Court noted that the content of the aforementioned law, while it was in draft form, was analysed by the OSCE Office for Democratic Institutions and Human Rights (ODIHR) and the Council of Europe Commission for Democracy through Law (Venice Commission). The Constitutional Court also referred to the OSCE statement from 2024, which indicated that the analysis concluded that the Draft Law was in conflict with “the Constitution of Republika Srpska and the Constitution of Bosnia and Herzegovina, as well as with numerous international and domestic obligations in the field of respect for human rights”. Therefore, the Constitutional Court, without prejudging the outcome of the decision on the merits, determined that there was a likely likelihood that serious consequences would be created for such associations and foundations immediately after the entry into force of this law.⁴

Freedom of Assembly

The laws on freedom of assembly remained inconsistent across the country and did not fully comply with European standards, especially regarding the grounds for restrictions and the organisers' responsibilities. The exception is the 2020 Brcko District Law on Freedom of Assembly, which is largely harmonised with European standards. In 2024, three cantons in the Federation of BiH—specifically, Una-Sana Canton, Zenica-Doboj Canton, and Canton 10— enacted new legislation aimed at aligning with European standards, based on the model law introduced in the Brcko District in 2020.

Additionally, in an effort to align its regulations with international standards, the Government of Tuzla Canton adopted a Law on Peaceful Assembly in Tuzla Canton in 2024. This law repealed the previous Law on Public Assembly, which included several restrictive provisions.⁵ The adoption by the Tuzla Canton Assembly still pending.

For instance, the Draft Law provides an improved definition of “peaceful assembly” as an intentional and temporary gathering of persons in a public place in the territory of Tuzla Canton in order to express a common opinion and convey common messages and attitudes under the conditions prescribed by this law. It shortens the current deadline for advance notification from 7 days to 48 hours. Moreover, it protects spontaneous assemblies by removing the requirement that they be notified to the police in advance.

³ The Constitutional Court of Bosnia and Herzegovina, Extraordinary plenary session, 7 March 2025

⁴ Informacija Ustavni sud BiH, Vanredna plenarna sjednica, March 2025

⁵ Article 1. of the Law on Peaceful Assembly in Tuzla Canton in 2024 Tuzla Canton.

Regarding the effective realisation of the right to freedom of peaceful assembly, protestors sometimes faced administrative hurdles and even police violence. Organisers also became targets of political harassment. In the Republika Srpska entity, freedom of assembly was particularly constrained in 2024.

On June 22, 2024, Sarajevo hosted its fifth consecutive LGBTIQ pride parade without any incidents, with the support and demonstrated solidarity of citizens of from other cities within BiH, public figures, politicians, cultural workers, and representatives of the diplomatic corps in BiH.⁶ At the same time, the LGBTIQ pride parade did not take place in the Republika Srpska entity in 2024, following a coordinated attack by hooligans on Pride activists in Banja Luka in the year before.

It was to be observed that there were frequent instances of high-ranking officials of the Republika Srpska, public figures and organised groups demonstrating a clear “anti-gender” agenda, also inciting violence and discrimination against LGBTIQ people. The President of the Republika Srpska entity, on several occasions, publicly announced that the Republika Srpska Government will adopt a law that will ban members of LGBTIQ organisations from entering kindergartens, schools and universities.⁷

In May 2024, a group of CSO demonstrators gathered in front of the Republika Srpska National Assembly to protest against the adoption of the so-called law on foreign agents. They brought a coffin to symbolise the “death of democracy” in Republika Srpska. As a result, misdemeanour charges were filed against the demonstrators for failing to announce the gathering and for alleged insults made during the performance.⁸

Spontaneous public gatherings are more frequently hindered in smaller communities within the Federation of BiH and the Republika Srpska, where participants have limited or no access to media and institutions. Organisers and participants of such gatherings often experience misdemeanour fines, intimidation, and even violence. This type of pressure is the most applied to environmental protesters, but it also affects smaller labour protests.⁹

Freedom of Expression

Although freedom of expression is guaranteed by the Constitution, there has been no progress in the realisation of freedom of expression and of the media, or in the protection of journalists. The criminal penalties for defamation in the Republika Srpska entity re-introduced in the Republika Srpska Criminal Code in July 2023 keep impacting the freedom of expression and freedom of the media and continue to have a chilling effect.¹⁰ Numerous criminal reports in six district prosecutors’ offices in Republika Srpska are piling up, while journalists and citizens live in fear.

On 22 September 2023, 14 members of the House of Representatives of the Parliamentary Assembly of BiH and Mr. Denis Zvizdic, the second deputy Chairman of the House of Representatives of the BiH Parliamentary Assembly, submitted to the BiH Constitutional Court a request for an assessment of the constitutionality of Articles 208a of the Republika Srpska Criminal Code, claiming that the 2023 amendments are against the Constitution of BiH. The Constitutional Court of BiH, in Case no. U-21/23¹¹, decided, at its plenary session held on 18 January 2024, that Article 280a. are in line with the BiH Constitution and Article 10 of the ECHR. The BiH CC, inter alia, noted that the fact that defamation, after a long period, was again prescribed as a criminal offense, was not in itself against the BiH Constitution or the ECHR. However, the BiH CC also considered it necessary to point out that, although it did not judge the aforementioned provisions to be unconstitutional, the competent authorities in RS should act with special care in the cases of criminal prosecution for the offences prescribed by these articles, and notably take care to apply the challenged provisions in accordance with standards under the well-established case law of the ECtHR and BiH CC. The BiH CC further emphasized that competent

6 Pride March 2024, June 2024.

7 Pink Report 2024, Sarajevo Open Center.

8 Nezavisne novine, May 2024.

9 ‘Media Freedoms in BiH 2016–2024’ report, Association BH Journalists / OSCE, The situation of human rights defenders in Bosnia and Herzegovina: Good practices and protection gaps, August 2024.

10 News ‘Nema optužnica za klevetu u RS, zbog zakona i dalje postoji strah’, Radio Free Europe.

11 Decision of the BiH Constitutional Court.

authorities should, as much as it is possible, avoid using legal remedies that could deter citizens, notably journalists, from expressing critical opinions on issues of public interest due to fear of criminal and other sanctions.

By August 2024, a total of 122 criminal charges had been filed for alleged defamation and the disclosure of personal and family circumstances, while eight criminal charges for defamation against journalists and editors had been filed in Republika Srpska district prosecutors' offices.¹² By early 2025, no one had yet been convicted, but the significant number of charges suggests that this law may be used as a means of intimidation until consistent prosecutorial and case law practices are established. According to one source of information, published in several media in BiH, it was mainly politicians in the Republika Srpska who had filed criminal charges against journalists and the media.¹³

In the Federation of BiH, a draft amendment to the criminal code was proposed that raised concerns about freedom of expression. On 12 December 2024, the Government of the Federation of BiH adopted the Draft Law on Changes and Amendments to the Criminal Code of the Federation of Bosnia and Herzegovina (FBIH CC) and submitted it for parliamentary procedure. The proposed amendments included reference to Article 193 of the criminal code, which refers to the unauthorised use of personal data. The proposed new Article 193a suggests that unauthorised publication and display of documents, photographs and recordings without a person's consent may result in a fine or imprisonment for up to three years. The concern is that this opens space for abuse and can limit transparency, media freedom, and freedom of expression.

The developments in the two entities in 2024 mark a considerable regression for the enjoyment of the right to freedom of expression (actual in the case of Republika Srpska, potential in the case of Federation of BiH). They negatively affect free and inclusive political discourse, the ability to seek, receive, and share information, and the freedom of the press.

At cantonal level in FBIH, there were some notable developments. In Canton Sarajevo a Draft Law on Offences against Public Order and Peace categorised the internet and electronic media as public spaces. This sparked a debate among the public, particularly the section of the draft law dealing with the offence of spreading 'fake news'. CSOs, media professionals and international organisations raised concerns and requested that Sarajevo Canton Government withdraw the draft from further consideration and the adoption process. This is what eventually happened.¹⁴

In December 2024, the government of the Una-Sana Canton began the process and expected to develop a new law on information in 2025 (existing law from 1998). A working group formed by the government in Una-Sana Canton and the Ministry of Education is working on its development, consisting of representatives of the media, academia, the Ministry of Education, Science, Culture and Sports, the Ministry of Internal Affairs, and legal experts. Representatives of the working group explain that the new law is necessary due to the numerous changes that have occurred since then, especially in the field of digital media and social networks. On the other hand, CSOs from BiH warn that excessive (self-) regulation and legal standardization are not always effective and can cause damage to media freedoms, perhaps even greater than that caused by the lack of legislation.

In Herzegovina - Neretva Canton, the Cantonal Ministry of the Interior announced the intention to introduce changes and amendments to the Law on Public Order and Peace of Herzegovina-Neretva Canton, which were similar to those proposed in Sarajevo. It remained unclear whether the development and adoption of this law in Herzegovina-Neretva Canton would proceed following the withdrawal of draft in Sarajevo.

¹² News, Dnevne vijesti.

¹³ News BH Novinari – Poceo progon slobode govora u RS

¹⁴ Draft Law on violations against public order Canton Sarajevo.

Free Access to Information

In August 2023, a new Law on Freedom of Access to Information, aimed at fostering proactive disclosure and transparency, was adopted by the Parliamentary Assembly of BiH.¹⁵ This law sparked numerous debates in the BiH Parliamentary Assembly, as it may limit access to information of public interest due to its extensive list of exceptions or potential restrictions within the civil society sector. This 2023 Law on freedom of access to information still needs to be brought fully in line with international standards on the independence of the appeals process. Since the 2023 State level Law abolished the previous one that was applied by the Brcko District of BiH authorities, there is currently legal vacuum in the Brcko District. During 2024 the Brcko District Government's working group was drafting a new Brcko District Law whose adoption is expected to happen in 2025.

By September 2024, the law had not achieved any progress in freedom of access to information and proactive transparency. Institutions had not yet complied with several obligations imposed by the new law. As an example, the Central Portal of Public Information had not been established. The method of organisation and management for implementation of the law, and prescribed in secondary legislation, had not been adopted by the Council of Ministers of BiH. This is despite the deadline being within nine months from the date of entry into force of the new law. A new Appeals Council within the Council of Ministers of BiH responsible for appeals against first-instance decisions, had not been appointed, and the old one was continuing to operate.

In the course of 2024, Transparency International in BiH and other CSOs reported that unsatisfactory practices in 2022 and 2023 regarding the application of the Law on Freedom of Access to Information threaten transparency in BiH.¹⁶ Nearly half of public authorities failed to respond to requests for within free access to information within the legal timeframe, and only slightly more than a third of institutions – 140 out of the 394 surveyed – provided all the requested data within the legal deadline. The data indicate that public authorities most frequently justify their refusal to provide information by citing the protection of personal data. This has been particularly evident in cases involving the details of service contracts, where most institutions have claimed that such information was not of public interest. Transparency International BiH highlighted that after the adoption of the new Law on Freedom of Access to Information at the level of BiH, the publication of data of public interest was not accelerated and no positive developments were recorded.

Media Freedom

The authorities in the Republika Srpska entity established a working group to draft a new media law in November 2024. This group comprises 15 members, including representatives from public and private media, lawyers, and members of the Republika Srpska Journalists' Association. There is concern in journalistic circles that this may be a new attack on the media. Many media representatives, particularly those registered as non-governmental organisations, fear that the new law, which is shrouded in secrecy, could jeopardise their status and activities within the RS, continuing the pressure on media and freedom of expression.¹⁷

In 2024, Bosnia and Herzegovina dropped 17 positions on the World Media Freedom Index by Reporters Without Borders (RSF)¹⁸, now ranking 81st compared to its previous position at 64th position (in 2021, BiH took 58th place). The 2024 ranking represents the largest decline amongst all the Western Balkan countries.

In 2024 journalists in BiH found themselves working in an environment of insecurity. Legislative and political pressures have intensified, and intimidation and harassment of journalists persist without adequate institutional response.

¹⁵ 'Official Gazette of BiH' no. 61/23.

¹⁶ Research 'The Unsatisfactory Implementation of the Law on Freedom of Information Threatens Transparency, in Bosnia and Herzegovina', Transparency International u Bosni i Hercegovini.

¹⁷ News 'Working Group on the Law on Media in RS' Radio Free Europe.

¹⁸ News 'Indeks medijskih sloboda 2024: BiH nazadovala za sedamnaest mjesta' Television N1.

Overall assessments

It is widely perceived that BiH is moving in the wrong direction with regard to fundamental freedoms, and that the various legislative changes in Republika Srpska represent a danger to the entire population, not only for Republika Srpska itself. Changes during 2024 will likely impair the enjoyment of the right to freedom of expression and contribute to a climate of shrinking civic space, as well as negatively impact the human rights situation.¹⁹

In 2021, the ranking of the country by Freedom House placed Bosnia and Herzegovina in 58th place, whilst in 2023 the country held 64th place in the world. In 2024, the country took 51st place.²⁰

According to the 'Economist Intelligence Unit's Democracy Index, which provides a snapshot of the state of democracy in 165 independent states and two territories, the 2024 Democracy Index for Bosnia and Herzegovina overall score was 5.06, which is 88th place in total rank, with the change in rank from the previous year being 6 places lower. Specifically, the rank for the electoral process and pluralism score was 7.00, for the functioning of government, 3.64, for political participation, 5.00, and for political culture, 3.75. The civil liberties score was 5.88.²¹

According to the CIVICUS State of Civil Society Report for 2024, Bosnia and Herzegovina were marked by an 'obstructed' state of civic space conditions (freedom of association, peaceful assembly and expression), with the current score rating at 57/100.²² In 2023, Bosnia and Herzegovina were marked by an 'narrowed' state of civic space conditions.

¹⁹ News 'Zakon o stranim agentima opasan i za BiH', Srpska Info.

²⁰ Freedom in the World 2024.

²¹ Democracy Index 2024.

²² CIVICUS State of Civil Society Report for 2024.

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

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

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

There were no legislative changes in 2024 regarding CSOs' access to an effective remedy to challenge or seek review of decisions affecting the exercise of their rights. The legal framework for access to an effective remedy for CSOs is regulated by the Criminal Procedure Codes of BiH, FBiH, Republika Srpska and BD BiH, the Laws on Civil Procedure of FBiH, Republika Srpska and BD BiH, and the Laws on Administrative Procedure of BiH, FBiH, Republika Srpska and Brcko District BiH.

A major problem arises when this right is viewed in correlation with access to the right to a fair trial in accordance with Article 6 of the European Convention on Human Rights the rights of citizens in BiH to speedy and efficient justice are infringed due to the excessive length of judicial proceedings. Even though the duration of court proceedings has gradually shortened, it is still too long and needs to be further reduced. The length of court proceedings in first-instance cases decreased from 409 days in 2021 to 378 days in 2022.²³

According to the CSO survey for 2024, 3% of CSOs were able to challenge such decisions as affected the exercise of their rights through official, legal, judicial and administrative channels, whilst 11% of CSOs were not able to challenge such decisions. These data should be compared with those for 2023, when 8% of CSOs were able to challenge such decisions, and 9% of CSOs were not able to (in 2021, 7% were able, 7% were not able).

Furthermore, 21 % of CSOs said that the government had undertaken decisions in 2024 that negatively affected their organisation's ability to exercise its rights (the data for 2021 and 2023 were both per 19%).

Among those 21 % of CSOs who stated that the government undertook decisions in 2024 that negatively affected their organisation's ability to exercise its rights, 14 % of CSOs were "able to effectively challenge such decisions through official, legal, judicial and administrative channels", compared to 40% in 2023, while 57% of CSOs said "their organisation was not able to challenge such a decision" - in 2023 it was 45%, and in 2021, 38%.

Also in 2024, the Draft Law on Citizens' Initiative and Protection of Citizens and Activists of the Federation of BiH was submitted to the FBiH Parliament as the first law that was entirely drafted by the non-governmental ecological sector. The draft law is aimed at protecting citizens, activists and journalists from lawsuits that try to silence them. The House of Representatives of the Parliament of the Federation of BiH, held on June 26, adopted the Draft Law on Civic Initiative and Protection of Citizens and Activists of the FBiH. This Law enables citizens to participate more actively in making decisions that directly affect their lives and communities. It is particularly important to note that the Law provides protection mechanisms for those who decide to engage in civic initiatives, ensuring that they can act without fear of repression or discrimination.

²³ It was not possible to obtain the data for 2023 and 2024.

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.

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	3 – moderately meets standards

The legal framework for the protection of CSOs from threats, attacks, judicial harassment and discriminatory treatment did not change, as they continued to be protected by general legal provisions. No legislative changes were enacted in BiH in 2024. The current legal protection of CSOs in Republika Srpska from threats, attacks, judicial harassment, and discriminatory treatment falls short of international human rights law standards because of the re-criminalisation of defamation in 2023. They were further threatened during 2024 by the attempts to adopt the “foreign agents” law.²⁴ The proposals in the Draft Law on a Special Register and Public Transparency of the Work of Nonprofit Organisations would allow for discriminatory treatment of CSOs, including bureaucratic harassment, and disproportionate reporting requirements. Although the draft was withdrawn from the parliamentary procedure in 2024, it was later adopted by the Republika Srpska National Assembly in February 2025. However, the Constitutional Court temporarily suspended the Law on 7 March 2025 (detailed analysis above in 1.1. Freedom of Association). Analysis of the impact of this law will be reflected in future Assessment reports.

Regarding the situation at other levels of government in BiH—namely the State level of BiH, the FBiH and its Cantons, and Brcko District of BiH—the relevant legislative frameworks did not change in 2024. The Criminal Code of BiH, Criminal Code of the FBiH and Criminal Code of Brcko District, respectively, and the Criminal Procedure Codes of BiH, FBiH and Brcko District of BiH, respectively, and the FBiH and Brcko District of BiH Laws on Protection against Defamation, the Law on the Prohibition of Discrimination, and the Law on Gender Equality, contain provisions relevant to the protection of individuals and legal entities from threats, attacks, judicial harassment and discriminatory treatment.

With regard to legal protection of CSOs in Bosnia and Herzegovina from threats, attacks, judicial harassment and discriminatory treatment there seem to be no exclusive provisions that would apply exclusively to CSOs, but the provisions are of a general legal nature and apply equally to everyone who believes that their rights have been infringed. The 2009 Law on the Prohibition of Discrimination, which aims at full alignment with the EU acquis, is still not being applied effectively, and there is no reliable data collection. Given this omission, it is essential to implement this measure promptly to establish a safer environment and better working conditions for media and journalists. The authorities at all levels of government in BiH have consistently failed to take this action in recent years, including 2024.

Negative trends include, but are not limited to, harassment, threats, defamation and other cases of criminal charges, and attempts at censorship, intimidation, etc. For instance, in 2024 following a coordinated attack by hooligans on Pride activists in Banja Luka in the year before, numerous instances of incitement to violence and discrimination against LGBTIQ people by high-ranking officials of the Republika Srpska, public figures, organised groups, and non-governmental organisations with a clear anti-gender agenda have been reported.²⁵

Media representation of ‘traditional’ values and the family, deliberately or accidentally create a

²⁴ News “Zakon o ‘stranim agentima’ RS narušava ustavni i pravni poredak BiH, upozorila EU”, Radio Free Europe

²⁵ Pink Report 2024, Sarajevo Open Center

discriminatory effect, especially those media outlets which are under the direct influence of officials and politicians.²⁶ When it comes to respect for human rights, statements of politicians do not help suppress prejudice and hatred towards homosexuality and homosexual persons. They are manifested in different ways, mainly through verbal insults. For example, Milorad Dodik, the President of the Republika Srpska, said in Banja Luka that the values cherished by some EU members about LGBTIQ would never be included in the Republika Srpska legislation, even if it meant not receiving EU funds for accelerated development.²⁷ Dodik has also publicly announced on several occasions that the Republika Srpska Government will pass a law that will ban members of LGBTIQ organisations from entering kindergartens, schools and universities.²⁸

During an exhibition organised by BH Pride, on the night of June 13–14, offensive graffiti were written on the Goethe Institute building in Sarajevo.

There are also a growing number of cases of political pressure and verbal insults towards journalists and the media made by politicians²⁹ and public officials³⁰. Threats to female journalists and cases of gender-based violence have not abated, and there have been more verbal attacks on female journalists.³¹ No physical violence cases have been reported so far. But some of the examples included the threatening message 'Die NMZ' written on the house of journalist Nataša Miljanović – Zubac from Trebinje.³² The journalist of Al Jazeera, Žana Kovačević, has been stalked, unknown person(s) frequently visiting her building and the entrance where she lives, and conducting surveillance of her car.

There have been several positive examples of good practice by judicial institutions, including through the appointment of "contact points" for providing safety for journalists. Officials in prosecutor's offices and police units have been tasked with recording threats against journalists, initiating urgent investigations, and maintaining records of attacks. The Prosecutor's Office of Sarajevo Canton was the first to appoint a contact person for journalist safety. Between November 2023 and the end of May 2024, a total of 32 "contact points" have been appointed in prosecutor's offices and police departments. The High Judicial and Prosecutorial Council (HJPC) of BiH recommended these appointments, and chief prosecutors made individual decisions on the "contact points", assigning prosecutors to keep records of attacks and urgent investigations in such cases. Additionally, the HJPC has opened a special link on its site with contact information.³³

Indicator 1.2.c: Proportion of CSOs that operate effectively without threats, attacks, judicial harassment, in terms of: - number of complaints concerning lack of protection of CSOs;

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

In 2024, 14% of CSOs reported experiencing threats, physical attacks, property damage, or being subjected to unlawful searches and communication interference by authorities. In 2023, the result was 26%, and in 2021, 14%.

26 Rezultati monitoringa lokalnih medija i društvenih mreža tokom izbora 2024, Media Centar

27 News "Dodik: Ne moramo dobiti ni fening, ali LGBT neće ući u zakonodavstvo Srpske!", Top Portal

28 Pink Report 2024, Sarajevo Open Center.

29 News "Dodik, the President of Republika Srpska, called N1 journalist Snezana Mitrovic on the phone, and shouted, insulted and cursed" TV N1.

30 News "The Board of Directors of the Association of BiH Journalists sent a public protest to Elmedin Konakovic, Minister of Foreign Affairs of BiH" Internet Portal Klix.ba

31 A letter from BH journalists and the International Federation of Journalists (IFJ) to the Minister of Internal Affairs of the Republika Srpska Siniša Karan and the Minister of Justice of the Republika Srpska Milos Bukejlovic.

32 "UMRI NMZ" – nove prijeteće poruke novinarki Nataši Miljanović Zubac, DIREKT PORTAL

33 News from the Prosecution/Prosecutor's Office of BiH.

The proportion of CSOs that reported not experiencing any threat, physical attack, property damage increased in 2024. Seventy seven percent of respondents indicated they had faced no such incidents, up from 67% in 2023, but marking no significant change compared to the 80% in 2021.

For those that were subjected to threats and attacks, the CSOs responding to the survey provided various additional details. Some said they were targeted by anti-gender activists during the public meeting discussion of the new Law on Protection from Domestic Violence in the Republika Srpska; some were targeted because they are an organisation that receives funds from US and UK donors; others experienced online hate speech on their social networks as an organisation that supports the rights of LGBTIQ people; and some said they were under constant pressure from the rhetoric of politicians during the election campaign.

In addition to this, 91% of those who reported experiencing threats, responded that they had not submitted complaints concerning the lack of protection. This is comparable to the 90% in 2023 and 96% of CSOs in 2021 who had not submitted complaints. Among the reasons given for not submitting complaints, CSOs said that they had complained in the past and the response by the authorities was not effective.

In 2024, 2–3% of CSO responses noted that they experienced incidents of damage to property, been unlawfully subjected to inspections, or had reported interference by the authorities with their communications. This is small, but not insignificant. In open answers expanding on their experiences, CSOs said that they had experienced an inspection for control from authority institutions along with those of their employees who were candidates in the 2024 Local Elections. Other responses detailed how CSOs had to initiate administrative disputes several times owing to denial of access to information and often received advice from the government telling them how to behave to receive financial support.

According to the public officials survey data in 2024, however, most public officials said that CSOs were able, in their view, to operate effectively without threats, attacks, judicial harassment and discriminatory treatment.

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.

2024	3 – moderately meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

Compared to previous years, in 2024 BiH made some progress in this area after the BiH Parliamentary Assembly adopted the new Law on Anti-Money-Laundering and Countering Terrorism Financing (AML/CFT) in February 2024.³⁴ This law enhances risk assessment provisions and establishes a permanent

³⁴ 'Official Gazette of BiH' no. 13/2024.

coordinating body responsible for its preparation, in accordance with the EU acquis³⁵. However, the bylaws required to fully implement the law in practice are still awaiting adoption. In February 2024, the Council of Ministers adopted a risk assessment for AML/CFT on virtual assets and an action plan for 2024–2027.

It should be noted that AML/CFT law compliance requirements do not deter the legitimate activities of CSOs. Intensive advocacy efforts by the CSOs and international organisations invested in this area prior to the adoption of the law have led to significant changes in the legal framework, including the exclusion of the reporting obligation for non-profit activities. Accordingly, the AML/CFT compliance requirements do not hinder the legitimate activities of CSOs.

During March – April 2024, the Ministry of Justice of BiH, with technical assistance from project EU4CS, funded by European Union, realised 4 trainings (in Banja Luka, Brčko, Sarajevo and Mostar) for civic society organisations about ‘Real ownership, Anti-Money-Laundering and Countering Terrorism Financing’ as support to implementation of public policies in BiH ‘2nd Action Plan 2022–2024 for implementation of Open Government Initiative’. In total 83 representatives of CSOs improved their capacities related to implementation of BiH legislation and international standards in the field of real ownership, FATF recommendations, the EU Directive AML/CFT and positive practices from the region regarding role of CSOs in Anti-Money-Laundering and Countering Terrorism Financing.

Indicator 1.3.b: The 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.

According to the CSO survey for 2024, 3% of respondents (as against 9% in 2023, and 6% in 2021) said the organisation or its members were subjected to judicial harassment for alleged connections with extremism, terrorism, money-laundering or corruption, or that the organisation was subject to discriminatory restrictions because of receiving funding from a particular source, or that the organisation was prevented by government authorities or banks from opening a bank account, or sending or receiving money. On the other hand, 92% of respondents said they were not subject of the above-mentioned obstacles. The proportion has remained largely the same across the years.

For the question whether the organisation was subject to discriminatory restrictions because of receiving funding from a particular source, 94% (in 2023, 90%, and in 2021, 91%) responded that they were not subjected to such restrictions, while 3% answered affirmatively that they were. Those who were subjected to restrictions mentioned, for example, that they had to issue additional organisational or project documents to their tax office or institutions regarding the funds received from foreign donors.

In line with previous years, no respondents were prevented by government authorities or banks from opening a bank account, or sending or receiving money.

³⁵ The new Law on AML/CFT is harmonised with Regulation (EU) 2018/1672 of the European Parliament and the Council of October 23, 2018, on controls of cash entering or leaving the Union and repealing Regulation (EC) no. 1889/2005; the Directive (EU) 2015/849 of the European Parliament and the Council of May 20, 2015 on preventing the use of the financial system for money-laundering or terrorist financing, on the amendment of Regulation (EU) no. 648/2012 of the European Parliament and the Council, and repealing Directive 2005/60/EC of the European Parliament and the Council and Commission Directive 2006/70/EC; and the Directive (EU) 2018/843 of the European Parliament and the Council of May 30, 2018, amending Directive (EU) 2015/849 on preventing the use of the financial system for the purpose of money-laundering or terrorist financing and amending Directives 2009/138/EC and 2013/36 / EU.

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.

2024	4 – meets most standards
2023	4 – meets most standards
2021	5 – fully meets standards

In 2024, the legislative framework for CSOs to submit reports and information remained unchanged. In the 2023 Assessment report, this indicator was downgraded from 5 to 4, owing to the negative developments regarding civil society in the entity of Republika Srpska on the potential adoption of the Draft Law on the Special Register and Public Transparency of the Work of Nonprofit Organisations. The law was withdrawn in July 2024 but subsequently adopted in February 2025. Its status is being contested in the Constitutional Court. The provisions of the law require the submission of special reports on the work of CSOs, as well as the possibility of banning their work if it is determined that there is political activity that is in contradiction with the Constitution of the Republika Srpska. What is more, the subject matter is defined too broadly. Further, the provisions on inspections are too broadly framed and lack the necessary safeguards to protect against abuse by the competent inspection body.³⁶

In 2024, the financial reporting requirements were uniform regardless of the CSO's size. Financial reports must be submitted to the Financial and Business Intelligence Agency of FBiH (FIA), the Intermediary Agency for IT and Financial Services of Republika Srpska (APIF), and the Ministry of Justice.

Many civil society organisations are of the opinion that inspections should only be conducted when there is suspicion of a serious legal violation, since such controls are unreasonable and overly intrusive.

SO 1.5. Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grass-roots organisations)

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

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

There are no formal rules or legislation on grassroots activities BiH, and the existing legislation allows community/local organisations and civic initiatives to operate without registering.

A relevant good practice example was an informal group of citizen activists under the name of One City, One Struggle, which disseminated a warning message through their printed bulletins and informed citizens of Sarajevo about problems with the water supply, the commercialisation of the City Hall and

³⁶ Analysis Republika Srpska: Draft Law on the Special Registry and Transparency of the Work of the Nonprofit Organisations (March 2024 Version) https://ecnl.org/sites/default/files/2024-04/ECNL%20ICNL%20Analysis%20RS%20Draft%20Law%20Special%20Registry%20and%20Transparency%20of%20NPOs%20April%202024_2.pdf

many other malpractices.³⁷

In cooperation with citizens and CSO partners, a grassroots group organised the “Jajce 2024 Summer School” for a group of students from Jajce and Vareš, aiming to act against segregation and work on reconciliation through dialogue. The intention is to overcome the separation of people based on varying criteria that contradict the principles of human rights in several parts of BiH, where examples of bad practice in education still exist, following the conflicts known as “Two schools under one roof”.³⁸

Grassroot initiatives have usually been unregistered and are consequently unable to apply for and receive funding from the budgets of different levels of authority in BiH. The size of the organisations do not seem to have presented an obstacle to their operations. If they ever decide to register and become formally entitled to government funding, such grassroots organisations need to comply with the same requirements as any other formally registered association in BiH.

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.

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2024, no formal restrictions are preventing unregistered small community/local organisations and civic initiatives from participating in consultation processes. In fact, they frequently assemble on an ad hoc basis to tackle important and unexpected issues. There are many examples of their successful organisation of small protests and public debates. As in the case of all other non-governmental stakeholders, they have sometimes encountered difficulties in getting effectively engaged in formal advocacy and consultation processes with governmental institutions on strategic, policy and legislative initiatives (e.g. to secure the pro forma engagement of CSOs just to meet the legal requirement on CSO consultation/engagement). Citizens from seven settlements of the City of Mostar, gathered together as the informal group of citizens, “Let’s stop illegal changes to the Spatial Plan in Mostar”. They appealed to the local and cantonal authorities to protect the interests of citizens by making changes to the Spatial Plan. The aim was to force the local authorities to move existing solar installations, installed near the Mostar suburban settlements, to locations as far as possible from populated areas.³⁹

Formally, any citizen or (un)registered CSO is able to participate by offering comments, remarks, and suggestions on government policies and legislation. However, in practice, similarly to other non-governmental stakeholders, unregistered small community/local organisations and civic initiatives occasionally face challenges in effectively engaging in formal consultation and advocacy processes with governmental institutions on strategic, policy, and legislative initiatives. There is a requirement for all interested stakeholders to formally register on the web portal of the BiH Council of Ministers ‘e-konsultacije’. It is sometimes difficult for the unregistered small community/local organisations and civic initiatives to register their initiative on this web portal as such. In practice they have most often registered as interested individuals or similar. In this way, they can participate as “citizens”, and not as unregistered small community/local organisations and civic initiatives. Furthermore, the web portal “www.ekonsultacije.gov.ba” website is not particularly user-friendly, especially for organisations with limited resources and capacity. Many unregistered small community/local organisations and civic initiatives face challenges in consistently monitoring and engaging with the processes, accessing timely information, and attending consultation meetings in person.

³⁷ Citizens’ Initiative Facebook group “Jedan grad, jedna borba”; “Rad za grad”.

³⁸ Facebook group of the Nansen Dialogue Center Sarajevo.

³⁹ News ‘Građani Mostara traže postavljanje zakona i zakonit prostorni plan’, Federal TV.

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..

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	4 – meets most standards

The legislation at the level of the State, FBiH, Republika Srpska and Brcko District remained unchanged in 2024. There was one positive step in 2023, when the Federal Ministry of Justice prepared the preliminary draft-working version of the Law on Financing of Civil Society Organisations in the Federation of BiH. It was the result of months of work by the group working and consulting on the principles of transparency and inclusiveness, which included representatives of civil society organisations, as well as representatives of relevant federal and state institutions, experts in the fields of civil society, law and finance.

But there were no new developments regarding this in 2024.

CSOs in BiH are allowed to receive without restrictions cash and in-kind donations from any sources, domestic public bodies, institutional, corporate or individual donors, foreign governments and multilateral agencies, to raise their own funds, engage in economic activities, and participate in public calls for grants and services. While the existing legislation provides freedom in these areas, in practice administrative and tax rules, alongside corruption, create an unfavourable financial environment for the civic sector. This should be viewed in connection with the Republika Srpska Draft Law on the Special Register and Publicity of the Work of Non-Profit Organisations (the Foreign Agents Law), which targets non-profit organisations established in the Republika Srpska that financially or otherwise help foreign entities as “agents of foreign influence”. Although withdrawn in July 2024, the Law was nevertheless adopted in February 2025. On 7 March 2025 the Constitutional Court of BiH temporarily suspended the Law on the Special Register and Publicity of Non-Profit Organizations.

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

According to the CSO survey for 2024, none of the CSO participants were subject to occasions of arbitrary audit, frozen accounts or required to register as a foreign agent. When compared to 2023 results, 2% of CSOs answered positively (in 2021 3%).

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.

2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In 2024, there were no changes to the existing legislation relevant to this indicator. Grants are awarded by all levels of government, i.e. at the State-level of BiH, the Federation of BiH, the Republika Srpska, Brčko District of BiH, cantons and local self-governments. There is still no uniform procedure at any level of government in BiH for allocation of funds. The existing procedures have many deficiencies and all need to improved standards throughout the country.

At the State level of BiH, this area is subject to a number of regulations such as the Law on Financing of BiH Institutions, Laws on Budget and International Obligations of BiH, Rulebook on Accounting with Accounting Policies and Procedures for Budget Users of BiH Institutions⁴⁰, and other regulations and individual decisions of BiH Institutions.⁴¹ The aforementioned regulations do not specifically define grants, but rather classify them within the framework of other transfers, subsidies and similar non-returnable budget grants for current purposes, or in capital grants and transfers that serve for the acquisition of capital assets.

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

The exact data on the percentage of the public budget disbursed is not available.

The data on the amount of public budget distributed in 2024 were not available at any level of government in Bosnia and Herzegovina. Comprehensive and reliable data regarding public funding is not possible to find in one place, owing to the fact that the majority of funding for CSOs comes from the municipality level of administration throughout the country. Budget funds distribution by a large number of BiH municipalities have required detailed analyses by four official Audit Offices of the Institutions in BiH – at state level, Federation of BiH, the Republika Srpska and Brčko District. The newest data available for 2023 is presented by Transparency International BiH on the site nvo.transparentno.ba, which monitors the distribution of public funds to associations and foundations in Bosnia and Herzegovina⁴². There, the findings established that 12,168 registered associations and foundations received BAM 104,356,522 (approx. EUR 52,200,000) via public funding from various levels of government institutions or municipalities in BiH. The number of grants distributed was 11,776.

⁴⁰ Open Attachment (mft.gov.ba).

⁴¹ The Council of Ministers of BiH 'Decision on criteria for awarding the grant funds of the Ministry of Human Rights and Refugees of BiH for the year 2020'.

⁴² Monitoring the distribution of public funds to associations and foundations in Bosnia and Herzegovina.

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.

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

There was some progress in adopting the 2024–2028 Public Procurement Strategy and its Action Plan with contributions from various stakeholders, including civil society, whose recommendation were partially accepted. CSOs are eligible to take part in public tenders announced by local authorities across all levels of government. The adopted Strategy aims to enhance and simplify the public procurement process by promoting equal treatment and fairness, fostering transparent and competitive bidding among suppliers to maximise value for money. Additionally, it prioritises maintaining the integrity and legality of procedures while introducing measures to combat conflicts of interest, fraud, and other corrupt practices. These improvements are designed to support all service providers, including the CSOs, in boosting their opportunities to secure public tenders. Additionally, amendments to the Law on Public Procurement were made, focusing on legal protection and the appeals procedure. Namely, the changes were intended to address the issue of so-called “professional appellants”, who complicate the public procurement processes⁴³. “Professional appellants” in the public procurement process in BiH are individuals or entities who (ab)use legal appeal mechanisms to influence the course of the public procurement process, often without the intention of actually participating in the provision of services or goods. This term is usually used to describe those who abuse the right to appeal in order to achieve their own benefit, either through prolonging the process, putting pressure on clients, or even obtaining financial compensation. This practice in appeal procedure has led to delays in procurement and increased costs for public institutions and was considered a serious challenge to ensuring an efficient and fair system of public procurement in BiH. However, the Law was passed without a proper public consultation process. Overall, public procurement continues to be susceptible to irregularities and corruption.⁴⁴

Contracts can be awarded to CSOs alongside other providers. However, overall, public procurement procedures are generally not favourable to CSOs. Registering a CSO as a service provider on the official public procurement web portal (e-Procurement) is possible in the category of an ‘association’, in consequence of which it can only be recognised within the contracting authority under specific sectors, such as environmental protection, agriculture, health and social protection, etc.

As regards grants and other non-procurement transfers, the Federal Ministry of Finance in May 2024 issued new Guidelines on minimum standards for allocation of budgetary funds through transfers and subsidies in the Federation of BiH.⁴⁵ These Guidelines establish the minimum standards for the allocation of budget funds from the Federation Budget, which are allocated by budget users through transfers and subsidies for the financing of legally established rights, programmes and/or projects of other levels of government, non-profit organisations and individuals. The minimum standards include general and specific financing conditions and procedures that budget users/providers should apply when allocating funds from the budget through transfers and subsidies through public calls. The procedures cover the activities of budget providers in planning budget funds, selecting, contracting, monitoring implementation, evaluating the results of spending funds allocated through transfers and/or subsidies, public disclosure and reporting.

⁴³ Changes and amendments to the BiH Public Procurement Law (‘Official Gazette of BiH’, no. 50/24).

⁴⁴ Report “Conflict of interest and corruption in public procurement”, Transparency International BiH

⁴⁵ ‘Official Gazette of FBiH’ no. 37/2024.

The grant-awarding procedures themselves differ, depending on the rules of the institution that awards the grant and depending on the type of grant. Regarding the transparency of grant allocation, there are also significant differences, as some grants are awarded through a public call, and some are awarded only on the basis of a submitted application for the allocation of funds. In the Federation of BiH, the method of allocating funds for grants from the budget in FBiH is also regulated by laws on FBiH budgets and laws prescribing the obligation to finance certain areas through grant funds; but there are no regulations that would regulate the procedure for awarding grants in a comprehensive and uniform manner. The form and content of the report on the expenditure of grant funds, the instructions for the preparation of periodic and annual reports and the deadlines for their submission, are regulated by the Rulebook on financial reporting and annual budget statements in FBiH.⁴⁶

The Republika Srpska government adopted the Grant Management Methodology for programmes and projects financed or co-financed by the Republika Srpska budget (no. 06.04/020–2004/14)⁴⁷. This methodology defines the general criteria for the selection of programmes and projects that are financed by grants from the budget of the entity, and it is foreseen that more detailed criteria specific to a certain area will be determined by the competent ministries with their internal acts. However, as observed in the Audit Report of the Republika Srpska Office for Auditing of the public sector,⁴⁸ the competent ministries in the Republika Srpska Government that allocated the grant funds did not submit reports, nor was a separate unique report made on the allocated grant funds, as provided for in the methodology. Moreover, there is still no register of beneficiaries of grant funds allocated from the Republika Srpska budget, which should include all users of grant funds.

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

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

No changes to the existing legislation relevant to this indicator were introduced in the course of 2024. There is no centralised data monitoring system to scrutinise the allocation, distribution, and implementation of projects. Consequently, CSOs report that funds are often allocated to organisations connected to the ruling political parties and are not based on their competencies or the real needs and relevance of their programmes and activities.⁴⁹

According to the public officials survey data in 2024, on the question regarding to what extent the relevant authorities made the information on awards of public funding to CSOs publicly available, half of the participants responded that it was sufficiently public, and gave examples of how government bodies organised the process of the development of strategies, or organised public consultations with CSOs, or directly invited them to workshops and other meetings.

⁴⁶ 'Official Gazette of FBiH', nos. 69/14, 14/15, 4/16 and 19/18.

⁴⁷ <http://www.vladars.net/sr-SP-Cyrl/Vlada/Ministarstva/mf/Documents/>.

⁴⁸ RU002-12_NP_Lat.pdf (gsr-rs.org).

⁴⁹ News "CPCD najavljuje pracenje utroska 3,8miliona KM koje je podijelilo Vijece ministara BiH", Internet Portal Klix. https://civilnodrustvo.ba/wp-content/uploads/2024/10/88-4-BiH-MM-Report-2023-final_11.10.2024.pdf

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

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

According to the CSO survey for 2024, 23% of CSOs answered that provision of domestic public funds was transparent and fair. In both 2023 and 2021, 14% of CSOs answered likewise. It can be concluded that the change for 2024–2023 was a 9% increase, and for the 2024–2021 change it was also a 9% increase.

In 2024, a high number of CSOs, 50% reported that they thought the provision of public funding to CSOs to be not transparent (not transparent at all, 13%; insufficiently transparent, 37%), while 36% of CSOs stated that they found the provision of public funding to CSOs sufficiently transparent or very transparent. This represents an improvement over previous years. In 2023 the comparable figure was 65%, and in 2021, 60%.

On the question as to how fair the provision of public funding was, 56% of CSOs replied not fair or insufficiently fair, whilst 23% (in 2023, 16%) said very fair or sufficiently fair. This again is an improvement over previous year. In 2023, 70% of CSOs said public funding was not fair or insufficiently fair, and in 2021, the figure was 69%.

According to the public officials survey for 2024, more than half of respondents said that their institution provided funding to CSOs. The majority of them said that the provision of public funds to CSOs was very transparent, and an equal number of responses affirmed that the provision of public funds to CSOs by their institution was fair. By “transparent” was meant, carried out openly with full information publicly available, so that the public could trust the process. By “fair” was meant, treating all CSOs equally, without favouritism or discrimination.

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

According to the CSO survey for 2024, 71% of CSOs answered that they had applied for public funding during 2024. This is an increase of 10% over the figure for 2023 (2023, 61%; 2021, 66%).

Of those who had applied for public funding, 61% said they were unsuccessful. This is slightly down from the 2023 figure, 70%, but well up on 2021, 25%). Only 26% were successful in their applications.

Out of those who were unsuccessfully applied, 41% of CSOs gave as a reason that the authorities fund their preferred organisations. As justification for this view, CSOs reported that they did not receive a proper explanation from the institution; that in Bosnia and Herzegovina the transparency of public funding of CSOs and the process of awarding funds are not always clear; that the institutions’ staff/ evaluators of project proposals were not qualified for the task; or that the institution claimed that the CSO did not submit all the required supporting documents.

Among the group of CSO who did not apply, 30% of CSOs said that the reason they did not apply was that they thought they did not have a realistic chance of winning. They explained that usually public funds are awarded to those associations connected to government, or that CSOs usually avoid wasting their time on preparation of proposals when they know in advance they will not be awarded, since there are not enough funds in the governments’ budgets for CSOs working on service provision.

According to the results from the public officials survey for 2024, on the question as to how inclusive the award of public funding was in 2024 to CSOs that their institution was responsible for, half of the respondents said that, in their view, it was “inclusive”. By “inclusive” was meant, that a broad range of CSOs were working on a variety of issues and representing many different communities or groups.

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

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

In 2024, the legislation at the level of the State, FBiH, Republika Srpska and Brcko District remained unchanged. The laws regulating the tax treatment of CSOs at the state and entity levels are still not harmonised.

In the Republika Srpska, legal persons can allocate up to 3 percent of their annual income for donations to organisations that implement humanitarian, cultural, sports and social activities, and up to 2 percent for sponsorship costs (in the Federation of BiH, legal entities can allocate up to 3 percent). Individual donors in FBiH can deduct the value of up to 0.5 percent of the income generated in the previous year, if they have made non-financial donations (in goods, services and transactions that do not involve money), and material and financial donations for cultural, educational, scientific, health, humanitarian, sports and religious purposes. In the RS, taxpayers can set aside up to 2 percent of their total income in that tax year, for the purpose of donations and sponsorships. Both in the Republika Srpska and in the FBiH, self-employed persons are exclusively entitled to these deductions regarding the income generated in the previous year. Donations above the prescribed amounts are also fully deductible by the foundation at the decision of the relevant ministries.

The laws provide for tax benefits, in the form of tax exemptions, for donations by individual and corporate givers for public purposes. The laws expressly provide for tax reliefs for donations in money for general purposes, but also in kind and assets. But the laws regulating the tax treatment of CSOs at the state and entity levels are still not harmonised.⁵⁰ For CSO projects of the EU instrument for the pre-accession programme to the European Union (IPA), VAT is exempted. Humanitarian, charitable, sports and similar organisations do not have to pay VAT on the goods and services they provide for their members in membership fee replacement.

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

The proportion of private individuals who gave money to a CSO in Bosnia and Herzegovina in 2024 was 57%; in 2023, it was 51%, and in 2021, 45%.⁵¹ The change over the period 2021–2024 was an increase of 12%.

⁵⁰ Indeks održivosti OCD u Bosni i Hercegovini za 2021. godinu.

⁵¹ WORLD GIVING INDEX 2024.

SO 1.9. Tax benefits are available to CSOs.

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

- CSO income generated from grants, donations, and membership dues, income from economic activities, investment income, real property, gifts and inheritance is not subject to taxation;
- any excess revenue or profit generated through economic activity and used for mission-related purposes by CSOs is not subject to corporate income/profit tax..

2024	3– moderately meets standards
2023	3– moderately meets standards
2021	3– moderately meets standards

In 2024, there were no significant changes regarding taxes affecting the non-profit sector at any level of government.

Carrying out related economic activities is allowed in both entities, as well as at the state level, without the need to establish a separate legal entity through which the related economic activities would be carried out. In this context, it is important that associations and foundations in their statutes clearly and in detail define the goals and economic activities that they will concentrate on in order to achieve their goals. In accordance with the provisions of the law on profit tax in the Federation of BiH, associations and foundations do not pay tax on the profit realised by conducting related businesses activities.

The Federation of BiH Profit Tax Law ('FBiH Official Gazette', Nos. 15/2016 and 15/2020) and Article 4 of the same law, define that associations and CSOs are not subject to the obligation of profit tax, unless they perform some market activity and derive some and/or other income from the market, with the exception of the income specified in paragraph 1., c) of Article 4 of the Law on Income Tax, and are liable for income tax for the income they acquire by performing such activities. (A CSO is liable for profit tax if it generates income on the market, which is not related to its goals. According to the position of the Federal Ministry of Finance (FMF), a non-profit entity in the Federation of BiH is considered liable for profit tax if more than 50% of its income is earned on the market. A CSO is liable for profit tax for funds paid from excess income over expenses i.e. profits to third parties such as founders, members, donors, and employees. Payments based on wages and benefits are not considered from get payments.

In the Republika Srpska (RS), the Law on Profit Tax stipulates that public institutions and "humanitarian organisations" do not pay tax on profits made on the basis of income from the budget, public funds, or "sponsorship" in money or in kind. According to this, if an organisation in the Republika Srpska does not report profit based on grants/donations, it is not subject to taxation. Monetary donations are not directly taxable, neither for the donor nor for the CSO as recipient.

Gifts and donations of goods and/or services given by business entities to CSOs are taxable only with the giver of such gifts and donations, if the giver is a registered VAT payer. This is because the provision of goods or the provision of services free of charge or with a reduced charge is considered a taxable transaction, on which the provider - the VAT payer - is obliged to calculate the VAT (17%) on the basis of the market value of the goods provided, i.e. the services provided free of charge or with a reduced charge. The CSO is not liable for VAT on the goods or services thus received.

Monetary donations given by various institutions to CSOs are tax-free, because it is assumed that they are donors (state bodies, various institutions, etc.) and not themselves profit-making entities, and not corporate tax payers either. Likewise, gifts and donations in goods and services provided by CSO institutions are tax-free because these institutions are not, as a rule, registered VAT payers. However, if one is, and such a donor is registered as a VAT payer, he would be obliged for the market value of donated goods or services to pay VAT (17%).

In the FBiH, income from membership fees is not taxed, as it is considered that they are not economic

fees activities, but the contribution of members. In the Republic of Srpska, income from membership fees is taxable for all types of CSOs except for humanitarian organisations and public institutions that are exempt from payment of membership tax. CSOs are entitled to fundraise and find they can easily obtain funds through various methods and from multiple sources. Fundraising through PayPal presents challenges for organisations. They incur fees from PayPal and/or other payment processors and are subject to a 10% tax on donations by the tax authorities of the place of registration of the CSO..

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

Indicator 1.10.a: Laws regulating volunteering are adopted.

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

Volunteering in Bosnia and Herzegovina is regulated by the entity laws in the Federation of Bosnia and Herzegovina (Law on Volunteering of the Federation of BiH) and the Republika Srpska (Law on Volunteering of the Republika Srpska), and also at the district level in Brčko district. There is no law on volunteering at the state level of BiH, despite persistent advocacy by CSOs.

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

2024	1 – does not meet standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

In 2024, as regards volunteering strategies, since all levels of government in BiH lacked such strategies, none were adopted by any level of government following the expiration in 2023 of the Strategy for the Improvement and Development of Volunteering in the Republika Srpska for 2019–2023. The new document of the Strategy for the following period has not been adopted by the Republika Srpska government.

The Federation of BiH has never had a volunteering strategy; the same applies to Brčko District of BiH. There were many efforts in the field of joint work with governments at cantonal and local levels, aiming at setting all required conditions for the development of strategies in 2024, especially those organised by the CSO Institute for Youth Development KULT. But no official document has been introduced by any government in 2024.

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

In 2024, 14% of CSOs answered they had benefitted from government employment programmes, compared with 15% in 2023, and 23% in 2021. The CSOs responding positively to this question were predominantly based in Republika Srpska, which is the only government entity that had relevant legal provisions for employment programmes applying to civil society organisations in 2023.

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

In 2024, 4% of respondents benefited from government volunteering programmes (compared to 3% in both 2023 and 2021). As for the previous indicator, CSOs answering positively were based in Republika Srpska since it is the only government entity which had relevant legal regulations in 2023.

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

In 2024, the labour force in Bosnia and Herzegovina consisted of 1.4 million people, of whom 1.3 million (88.3%) were employed and 166,000 (11.7%) were unemployed.

The Federal Statistics Office provided data on the proportion of the workforce in the civil society sector for 2024, showing a total of 7,059 employees in the Federation of BiH. This was comparable with 2023, when the total was 6,996 employees (data also includes employees for Brčko District).

The Republic Statistical Office of Republika Srpska did not provide the data for 2024, despite several requests. The data for 2023 showed there were 1,918 employed people in this sector.

The estimated number for the whole country for 2024 stood at around 8,977 employees in the civil society sector in BiH (FBiH/BD – 7,059 employees, Republika Srpska – 1,918 employees).

The FBiH government's decision to raise the minimum net salary to BAM 1,000 (approximately EUR 510), adopted at the FBiH Government session held on December 30, 2024, sparked strong reactions. Both the business community and civil society organisations in FBiH have expressed significant concerns regarding this change. This is due to the significant increase from the previous minimum salary of BAM 381, which also entails the higher contributions that all employers, including CSOs, are required to pay.⁵²

The decision by the FBiH government was taken without consulting any representatives from trade unions, the business community, or civil society organisations.

While the CSOs expressed their support for raising the minimum net salary to BAM 1,000, over 100 CSOs and foundations jointly requested a revision and adjustment of the implementation method to accommodate their specific needs.

There are currently around 9,000 employees in CSOs country-wide without government subsidies/support, and their CSOs will find it challenging to comply with the mandated salary increase. In response, the CSOs have requested that the FBiH Government recognise their situation and include them in the subsidy programmes detailed in the upcoming FBiH government decision on temporary financing. On the session of the Government of Federation of BiH session held in January 2025 this topic has not been discussed. Additionally, CSOs from Federation of BiH sought inclusion in the draft FBiH Budget for 2025. The CSOs warned that without such support, the decision by the FBiH Government could severely impact the living standards and employment status of individuals who rely on the civil society sector for their livelihoods.⁵³

Indicator 1.10.f: Percentage of people who have volunteered to give their time to an organisation The percentage of people who volunteered their time to an organisation in Bosnia and Herzegovina in 2024 rose slightly to 12%. In 2023, it was 9%, and in 2021, 7%.

⁵² News 'What does the minimum wage increase specifically mean for FBiH workers?', Sarajevo Times.

⁵³ News 'Minimalac od 1000 KM da, uz subvencije za civilni sektor', Civilno društvo.



Specific Objective 2

Strengthened cooperation and partnership between CSOs and public institutions.

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

Indicator 2.1.a: Laws, 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 the adoption procedure;
- The use of extraordinary/expedited procedures to adopt legislation without allowing for consultation is an exception and duly justified;
- Reports on results of public consultations, including reasons for rejection of comments, are published in a timely fashion;
- Working groups members from CSOs are selected based on a public call, clear criteria and in line with equal treatment;
- Working group members from CSOs include representatives of society as a whole, including women's groups, LGBTIQ groups, migrant groups, minorities, disability groups, and others as appropriate, in line with the Human Rights Based Approach.

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

In 2024 in BiH, public consultation was governed by several regulations at the State, FBiH, Republika Srpska, and Brcko District levels. These included rules for consultations in the process of legal drafting, uniform rules for legislative drafting, or similar legislative instruments. The frameworks at the state level of BiH, Republika Srpska and FBiH levels of government exhibit deficiencies concerning notification requirements, reporting on the results of the consultation process, and the publication of these reports. The only government mechanism for following this indicator is on the State level⁵⁴, with the established dedicated online consultation platform, www.ekonsultacije.ba.

It should be noted that a civil society mechanism also exists for encouraging public debate on proposed legislation. The CSO “Why Not?/Zašto ne?” established a dedicated website for public hearings for legislation which has entered the procedure of consideration in State, FBiH and Republika Srpska Parliaments, respectively – www.javnaraspava.ba. This web platform allows CSOs and the general public to engage directly in the decision-making processes in BiH. It also provides a channel for them to communicate with members of parliament regarding legislation currently under parliamentary consideration. However, the potential of this web platform appears to be underutilised. There is an opportunity for its greater promotion among wider CSO community (and also among MPs), and for its broader and consistent application during parliamentary procedures.⁵⁵

⁵⁴ E-konsultacije

⁵⁵ Javna rasprava.ba

State-level, FBiH, Republika Srpska, and Brcko District public administrations demonstrate a clear lack of reporting on the public consultation process and its outcomes. The information about public consultation provided in regulatory impact assessment (RIA) reports that support policy development, or in the explanatory memorandums accompanying each piece of legislation, is somewhat scarce, and of limited content (or even mostly missing). Consultation frequently appears to be confined to online publication of draft texts, reflecting a lack of proactive outreach by each administration to include under-represented stakeholders. There is no consistently established practice of informing stakeholders about upcoming consultations. Consequently, the potential of public consultation to inform and enhance policy development and law-making is not being effectively utilised throughout the country.⁵⁶

The use of urgent procedures for the adoption of legislation by all levels of government in BiH was intended to be strictly limited to exceptional cases and kept to the minimum. The use of urgent procedure reduces or eliminates civil society organisations from participating in the consideration of policies and legislation. Nevertheless, the practices of adopting laws by urgent procedure were common during 2024.

For example, amendments to the Law on Public Procurement were adopted by the Parliamentary Assembly of Bosnia and Herzegovina in July 2024 under an urgent procedure.⁵⁷

In Republika Srpska, the Government established several laws under urgent procedures, including proposals related to the High Judicial and Prosecutorial Council, amendments to the Republika Srpska Criminal Code, the Law on the Special Registry and Public Transparency of the Work of Non-Profit Organisations and many other laws.

The House of Peoples of the Parliamentary Assembly of BiH adopted the Law on the Budget of BiH Institutions and International Obligations of BiH for 2024 in an emergency session, without the possibility of changes and amendments.⁵⁸

Similar practices of adopting budgets in urgent procedure also exist at other levels of government in BiH, preventing CSOs (and any other interested parties) from taking an active part in the process of their formulation and adoption.

A final and ironic example is the adoption of the Law on Prevention of Conflict of Interest in the Institutions of BiH. While CSOs welcomed the adoption of this law, they criticised the absence of any consultations with them on this crucially important piece of legislation to tackle corruption. Namely, the entire process circumvented fundamental international standards, including assessing the likely impact of the regulations and ensuring basic transparency through public consultations. According to the CSOs, such (mal)practices are typical of authoritarian regimes and are inconsistent with BiH's aspirations to begin negotiations to join the EU.⁵⁹

On the positive side, there are some examples of good practice. However, such examples are typically the outcome of technical support projects-driven efforts by specific ministries in developing strategic documents, policies, or regulations. They still do not reflect the institutions' determination and commitment to the proactive, substantive and consistent involvement of civil society organisations from the earliest stages of strategy, policy, and legislation development up to their adoption. Nevertheless, one of the positive examples of the proactive engagement of CSOs is the process of developing the Strategy for creating an enabling environment for the development of civil society in BiH.

At the State level of BiH, where the legislation and the supporting web-based tool "eKonsultacije" facilitate the engagement of CSOs in the processes of consultation and public decision-making, the processes are the most advanced within the country. However, the e-consultation web platform is underutilised and is not in place or use at the entity or cantonal levels, where most legislation of public interest is developed and adopted. During 2024, with technical assistance of EU4CS project, funded by EU, e-consultation platform of the Republika Srpska government have been developed official consultation

⁵⁶ Publication 'Public administration in the Western Balkans 2024'.

⁵⁷ News "Dom naroda PSBiH usvojio Zakon o izmjenama i dopunama Zakona o javnim nabavkama" Portal Radio Sarajevo

⁵⁸ Hop of BiH Parliament adopts the Bill on the Budget of BiH Institutions for 2024, FENA

⁵⁹ Adoption of the new Law on conflict of interest in BiH – political violence, TI in BiH

webpage <https://e-konsultacije.vladars.rs/>. The Republika Srpska governments and its institutions are in initial phase of using the platform and planning to realise a promotional campaign during 2025 for enhancing usage of the platform by CSOs, social partners, academia and other stakeholders.

As regards other levels of authority, there were no significant changes in 2024. However, the situation in the Republika Srpska in 2024 when considering amendments to the Republika Srpska Criminal Code on criminalisation of defamation and the draft Republika Srpska Law on the Special Registry and Publicity of the Work of Non-Profit Organisations further deteriorated, with several examples of the intentional exclusion of CSOs from any consultative processes and even of the denial of CSOs requests for information of public interest⁶⁰.

The findings from the 2024 Civil Society Organisation (CSO) survey reveal a significant decline in the proportion of CSOs effectively consulted during the drafting of laws and policies. In 2024, 14% reported effective consultation, down from 31% in 2023 and 25% in 2021, indicating a weakening of engagement with public institutions.

Regarding institutional consultation, 9% of respondents (9 answers) were consulted by the Governments, while only 4% of respondents (4 answers) were consulted by Parliaments; a total of 5% of respondents (5 answers) were consulted by both.

Although the number of organisations involved in consultations decreased dramatically, the quality of consultations seemed to improve. Among those consulted by the Government, 89% of CSOs had access to the draft document from the beginning of the drafting process. In 2023, the result had been 27%, whilst in 2021, 17% of CSOs had had access to the draft document from the beginning. Additionally, 78% had at least 15 days to review and comment on draft documents, a sharp increase from previous years.

Regarding participation in policymaking bodies, 67% of the CSOs who said they had been consulted by the governments had representatives in working groups in 2024.

For those consulted by parliaments, 25% had access to draft documents, and 25% had at least 15 days to provide input. What is more, 25% of CSOs in this group said that their representative was a member of a parliamentary working group. Which is only one CSO who had change to above consultations by parliaments.

Among respondents consulted by both governments and parliaments, none of the CSOs had access to draft documents from start to finish, none of them had at least 15 days for comments, and none of them had their representatives included in working groups of both institutions.

In the public officials survey for 2024, more than half of the respondents said that, in their view, CSOs were effectively consulted in the development of the laws, by-laws, strategies, other acts of public interest and policy reforms for which their institution was responsible. Nevertheless, a small number of officials said that CSOs were not at all effectively or insufficiently incorporated into consultations.

When thinking about the consultation processes with the public, the majority of public officials believed that the public and the CSOs were sufficiently aware and informed of the opportunities for consultations. In the narrative justification, respondents said that governments regularly invited and gave space to CSOs for involvement in different processes, either via direct calls or via the webpages of institutions.

When asked about the consultation processes with the public that they were aware of which took place in 2024, more than half of respondents said that all communities and groups were sufficiently taken into account. Respondents said they had conducted various consultations with CSOs.

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

This indicator was not reviewed in the 2024 Assessment process.

⁶⁰ Transparency International in BiH has addressed the transparency issues in the Republika Srpska government's adoption process of the Law on the Special Register and Publicity of the Work of Non-Profit Organisations (the Foreign Agents Law).

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

This indicator was not reviewed in the 2024 Assessment process.

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.

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

In 2024, 20% of surveyed CSOs indicated the attitude of public officials toward civil society as being supportive. The result for 2023 was 24%, and in 2021 it was 12%.

In total, 66% of the respondents from the CSO survey in 2023 stated that public officials were not at all or insufficiently supportive towards CSOs (in 2023, it was 68%, and in 2021, 80%).

According to the 2024 public officials survey, the majority of respondents said that, in their view, they were supportive to CSOs, stating that institutions expected more contribution from civil society in some joint activities. When asked to share an example of the support towards and positive collaboration with civil society organisations shown by public officials in 2024, it was mentioned that support was systematic and there was a clear plan for support, because an evaluation had been carried out in the field with all actors in the programme.

Civil society participation in the EU accession process

Bosnia and Herzegovina applied for European Union membership in 2016, and in 2022 officially received candidate status. The country received the green light to open negotiations in March 2024 for EU membership, after fulfilling the additional reform requirements of the European Union.

The year 2024 was marked by political blockades, non-transparency and urgent procedures in decision-making process, especially when it came to laws and reforms of importance for the European integration process of Bosnia and Herzegovina. The most affected, due to the complex relationships between the decision-makers, was the European integration process itself. The European Commission confirmed that BiH did not submit a complete Reform Agenda in 2024, which is necessary if it is to receive financial resources from the European Union's Growth Plan for the Western Balkans. Therefore, BiH remained the only IPA beneficiary in the Western Balkans region that will not receive a first tranche of EUR 1 billion from the Reform and Growth Facility. BiH civil society did not take part in the adoption of laws and reforms of importance for the European integration process, nor in consultation processes, if they happened at all.

The only civil society participation in 2024 in government processes was the effective work of the Advisory Body of the Council of Ministers of BiH for Cooperation with Non-Governmental Organisations, which succeeded in contributing to and developing the first ever civil society strategy in BiH, namely the Strategy for Creating an Enabling Environment for Civil Society Development 2024-2028, within the joint work of the EU Delegation in BiH/EU4CivilSociety (EU4CS) project and the Ministry of Justice

of BiH. The Strategy is expected to be adopted by the Council of Ministers in 2025. During October-December 2024, a capacity building process for CSOs about 'Process of EU integration' have been realised via technical assistance to CSOs by project EU4CS, funded by European Union. During 7 trainings in various cities⁶¹, over 130 representatives of CSOs and other stakeholders, improved their competences related to the Accession Process (negotiation framework, intergovernmental negotiation conference, screening, criteria for opening, negotiation platform, negotiations and closing chapters, etc.), Methodology of negotiations between states and the EU, Principles of legal harmonization of regulations and ways of participation of CSOs in the negotiation process, as a ground for strengthening the perspective of CSO cooperation with competent authorities at all levels within the negotiation process.

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.

The first meeting related to the consultations with civil society in Bosnia and Herzegovina on the development of the first ever 'Strategy for Creating an Enabling Environment for Civil Society Development 2024–2028' in BiH (the Strategy), was held in June 2024. After the draft document of the Strategy was developed jointly by the representatives of the Advisory Body of the Council of Ministers of BiH for Cooperation with Non-Governmental Organisations and the Ministry of Justice of BiH, initiated by the EU Delegation in BiH and the project EU 4 Civil Society, CSOs received a first draft of the Strategy for on their review. The consultations were held in-person and the entire process was on a volunteer basis. A public call was opened for all CSOs who wanted to get involved in consultations, via the web portal of the Ministry of Justice of BiH www.ekonsultacije.gov.ba. CSOs were invited to submit their suggestions and proposals for creating the Strategy document. The members of the Advisory Body are individuals from the civil society sector in BiH.

Many organisations submitted their comments and suggestions, and they were included in the draft document that was presented in December 2024, when the second round of consultations was held with CSOs in person, and the EU4CS project (implementor of the process of the development of the Strategy) included the comments in the Strategy. Working group of the Ministry of Justice BiH, consisted by representatives of civic society and MoJ BiH, with technical assistance from EU4CS project, addressed received comments during finalization of the Strategy proposal. The report from the consultation meetings on the Strategy was planned to be published by January 31, 2025. The deadline for providing comments for the report by members of the Advisory Body of the Council of Ministers of BiH for Cooperation with Non-Governmental Organisations was one month. All members of the Advisory Body submitted their comments, and the next step is for the Ministry of Justice of BiH to publish and submit the final Report to all CSOs and officials to complete the process.⁶² Members of the Advisory body were members of the working group and were engaged in development of the draft Strategy all the time – they didn't have special comments to draft Strategy.

The CSOs who were involved in the process reported that it was encouraging to see that the process was not one-sided (meaning that not only the Ministry of Justice of BiH was involved) and all opinions of CSOs from the field were taken into consideration. They also said that it was refreshing to see a more proactive approach by the institutions towards CSOs. They also feel that it was important that the

⁶¹ Sarajevo, Banja Luka, Doboj, Brčko, Tuzla, Bihać and Zvornik

⁶² Izvješće o provedbi Sporazuma o suradnji između Vijeća ministara Bosne i Hercegovine i nevladinih organizacija u Bosni i Hercegovini za 2024.godinu <https://ekonsultacije.gov.ba/>

consultations were held in person, because they believe that it is more productive for the document itself when people meet face-to-face and discuss.

The CSOs said they subscribed to the web portal 'e-konsultacije' and received an email with the invitation to attend the consultations on Strategy development, and that the news was published there. In addition, the CSOs invited other organisations, through various CSO networks, to join the consultation process. Information about the dates and locations of the second round of consultations was sent through the EU TACSO 3 and the EU4CS project. However, the CSOs had the complaint that some organisations received an invitation for consultations to the email addresses of colleagues who do not work on the programme but rather, for example, in the procurement, logistics or administration of the CSO. It was suggested that the mailing lists of the CSO be updated by the relevant institution bodies organising the process of consultations. Furthermore, some organisations dealing with issues of persons with disabilities were unable to attend the consultation meetings in-person and should have been invited to submit their comments in written format. Also, the invitations arrived to some CSO inboxes very late, often only one day before the consultations date, and many organisations from distant locations could not organise themselves to prepare themselves to come and participate properly. One idea proposed as a solution came from Tuzla, where a single organisation representing all the CSOs from the Tuzla region consolidated comments from all involved in the Tuzla network and submitted them to the Ministry of Justice of BiH, in order to relieve the rest of the CSOs of this additional work.

The CSOs report that many new civil society issues have been opened in this process of Strategy development, and these have been the problems that many CSOs share about financing, sustainability, implementations of the laws, and the shrinking space for CSOs; all of which are recommended for inclusion in the next Strategy or other processes important for civil society. The CSOs have said they would be happy to participate in a new round of consultations and meetings of this type.

Additionally, regarding the 'www.ekonsultacije.gov.ba' website, CSOs have remarked that it is not a very user-friendly tool for the capacities of all organisations. Many CSOs have very limited resources and opportunities for regularly monitoring and participating in website processes, as well as for receiving information, and being personally present at meetings.

The CSOs who did not participate in the consultation meetings on the civil society strategy development mostly said that their employees received an invitation from the EU TACSO 3 project, but did not manage to attend the live consultations because they already had planned activities and not enough staff to cover all obligations; or that the colleagues available at their office worked on other projects and were not familiar with this area. The CSOs said they needed to organise themselves better internally with regard to this in the future. They plan to continue cooperation with the relevant authorities, because the topic of the Strategy is important.

One CSO stated that they did not participate in the consultations because they were not invited. They do not know why they were not invited. They would have participated if they had been invited. They advised that consultations be organised by categories and areas of CSO work.

Another organisation also said that they did not receive an invitation. In the meantime, they found out that the EU TACSO 3 and Ministry of Justice of BiH databases contain only the private email addresses of some employees in the organisation, and therefore invitations went to junk email inboxes and were left unnoticed.

Another obstacle has been that victim support CSOs are too busy working directly with their beneficiaries and often do not have time to attend meetings/consultations in person, specifically their colleagues from the Safe House; or to follow all legal developments regarding their in the country. They would be more comfortable submitting online comments in the future.

Regarding the website 'www.ekonsultacije.gov.ba', some CSOs had not heard of this website and its purpose and function before. The reason may again be that some organisations have been very focused on working directly with beneficiaries and have not had the time to deal with general civil society issues. They were not familiar with the information that the Ministry of Justice of BiH has responsibility for civil

society in BiH, nor that they have a database of CSOs in BiH, nor that their email addresses are part of that database. They have not had any communication with the MoJ BiH so far.

They all certainly agreed that the consultation on the process of the civil society strategy was very important and would be happy to participate in this area in the future. ⁶³

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

2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

There was no national civil society strategy adopted in 2024 in BiH.

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

2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

There was no national civil society strategy adopted in 2024 in BiH.

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

There was no national civil society strategy in effect in 2024 in BiH.

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

There was no national civil society strategy in effect in 2024 in BiH.

⁶³ Focus Group discussion source

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.

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2024, the Advisory Body of the Council of Ministers of BiH for Cooperation with Non-Governmental Organisations was the mechanism for dialogue between the government and civil society. Their work programme existed on an annual basis, and was written at the end of the year (2023) for the following year. At the beginning of the work of the Advisory Body, they agreed that they would have regular meetings (the official requirement is to meet four times in one year), but also that they would meet ad hoc if an urgent situation arose, or a hot topic opened up in the country, such as the adoption of some laws that might have negative implications for CSOs and their work and financial business. All these concerns were presented as proposals for topics for the upcoming meetings of the Advisory Body. All members have been free to express their opinions on all the issues they are dealing with, within their organisations and the sectors they work in.

In 2024, participation in the Advisory Body was also on a voluntary basis, as proposed by the Rules of Procedure of that Body. In their mandate, the members were supposed to have four meetings together with the entire Council of Ministers of BiH. However, they did not have a single meeting, even after they had sent several requests to the Council of Ministers, without receiving any response from them in 2024. Neither the previous nor the current Council of Ministers invited the members of the Advisory Body for a meeting. Further, there was no meeting with the Ministry of Justice of BiH, even though responsibility for liaison with the Advisory Body was assigned to this Ministry.

The members of the Advisory Body believe that their existence and work was there only to meet certain EU requirements in the form of a document on paper, but that is not being respected in practice.

The main success in 2024 was that the Advisory Body members managed to draft 'The Strategy for Creating an Enabling Environment for Civil Society Development 2024-2028' in BiH (The Strategy), which was near to completion at the end of 2024. The second success is that the Council of Ministers of BiH (CoM of BiH) included the CSOs in this process. However, they think that the processes would have unfolded better and quite differently if there had been a greater willingness by the Council of Ministers of BiH to cooperate with them more frequently. The Advisory Body mandate was set to expire at the end of 2024, and they think that much more work could have been done by them. They expressed an excellent cooperation with the international community in BiH. This collaboration has been established for the future, which is definitely to the advantage of the Advisory Body, because the international community in BiH can intensify advocacy processes in the direction of the relevant institutions in BiH when it comes to the most important topics for civil society.

They hope that the new members of the Advisory Body will have a better starting position than they did, and that it will make some progress. But the general opinion is that there will be no real progress in BiH civil society until the authorities understand that they need cooperation with CSOs. The suggestion for the authorities is that they need to take the civil sector a little more seriously. Progress in many areas is possible only by working together, because CSOs were not created just for their own sake, but out of real social needs.⁶⁴

⁶⁴ Focus Group discussion source



Specific Objective 3

CSO capacity and resilience to carry out their activities effectively are reinforced

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

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

2024	3 – moderately meets standards	52%
2023	3 – moderately meets standards	56%
2021	3 – moderately meets standards	52%

In 2024, 52% of CSOs had an independent and effective governing body. In 2023 it was 56%. The result for 2021, 52% was the same as that recorded for 2024.

In 2024, 98% of CSOs reported having a governing body, and 98%, a governing document. As regards the independence of governing bodies, however, 40% of the respondents reported that the executive director or another paid staff member of their organisation was a voting member of the governing body.

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.

2024	1 – does not meet standards	9%
2023	1 – does not meet standards	17%
2021	1 – does not meet standards	11%

According to the CSO survey results for 2024, a declining number (9% of CSOs compared to 17% in 2023) checked potential conflicts of interest every year with regard to the political, financial and personal relationships of the members of their governing body (2021, 11%).

Some 43% of CSOs said they were required to sign a conflict-of-interest declaration once they had entered their roles. The explanations in open answers from CSOs as to why they had not signed conflict-of-interest declaration included such statements as that they were a volunteer for the governing body position, meaning they did not find it necessary. Some other CSOs said that they were not able to sign the document since they were the branch office of a larger organisation. Another CSO said that they all worked in the best interests of the CSO, since their beneficiaries were the parents of children with disabilities; or that they signed when a legal situation arose where there could be a conflict of interest.

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

2024	2 – minimally meets standards	32%
2023	1 – does not meet standards	16%
2021	2 – minimally meets standards	24%

In 2024, an increased number (32% of CSOs) shared relevant information on their organisation website. In 2023, the figure was 16%, and in 2021, 24%. It can be concluded that the change between 2023–2024 was 16%, indicating an 8% increase between 2021 and 2024.

Some 44% of CSOs published their governing document on the organisation's website, 46% of CSOs published the structure of their organisation's board on their website, and 39% of CSOs published the names of the organisation's board members on the website.

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

2024	2 – minimally meets standards	36%
2023	2 – minimally meets standards	39%
2021	2 – minimally meets standards	35%

In 2024, 36% of CSOs (compared to 39% in 2023) had an organisational gender equality policy (in 2021 it was 35%).

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

2024	4 – meets most standards	71%
2023	4 – meets most standards	75%
2021	3 – moderately meets standards	57%

In 2024, 71% of CSOs had an organisational strategy (in 2023, it was 75%, and in 2021, 57%) in accordance with the same indicator.

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 on-line channel of communication.

2024	5 – fully meets standards	97%
2023	5 – fully meets standards	96%
2021	5 – fully meets standards	100%

In 2024, 97% of CSOs had at least one on-line channel of communication, compared to 96% in 2023, and 100% in 2021.

The majority, 93%, used Facebook, whilst 48% used their website, 46% used Instagram, and 40% of CSOs used messaging apps; 23% used YouTube, and 12% used X platform (Twitter).

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

In 2024, this indicator was not assessed.

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

In 2024, 30% of CSOs cooperated with the media (in 2023, it was 36%, in 2021, 30%).

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.

2024	2 – minimally meets standards	25%
2023	2 – minimally meets standards	31%
2021	3 – moderately meets standards	42%

In 2024, the number of CSOs that published a financial statement and annual report on the organisation website or in hard copy declined further. In 2024 the number was 25%, while in 2023 it was 31%, and in 2021, 42%. In 2024, out of those CSOs who published, 27% of CSOs published a financial statement and annual report on the organisation's website, 7% on social media, and 32% in hard copy.

In their open answers, CSOs from BiH said they were not in the habit of publishing these key documents on their website, but that all report documents were available in hard copy version in their offices and or available on review; and when they submit a project proposal, they usually attach the scanned copy of those documents.

The 2023 value for Indicator 3.3.a was originally published as 51%. Following the recalculation of the value to rectify an error, the revised value for 2023 is 31%.

The 2021 value for Indicator 3.3.a was originally published as 55%. Following the recalculation of the value to rectify an error, the revised value for 2021 is 42%.

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

2024	2 – minimally meets standards	25%
2023	2 – minimally meets standards	34%
2021	2 – minimally meets standards	29%

In 2024, 25% of CSOs published information on both their sources of funding and the amounts received, a decline over the value for the previous year. In 2023, it was 34%, and in 2021, 29%.

Sixty percent of CSOs stated that their organisation had published information about their sources of funding in 2024. At the same time, while 33% of the CSOs stated that their organisation only published information on the amounts received, 18% of the CSOs stated that they did not publish information on any amounts received, nor on their sources of funding. Some CSOs stated the reason for not publishing the sources of funding was that it was the CSO Assembly decision, or that they would submit these data to the competent authorities and donors on request, or that they had spent such insignificant amounts for activities and funding.

Indicator 3.3.c: Degree of public trust in CSOs

In 2024, the Regional Cooperation Council's Balkan Barometer asked 1,000 residents in Bosnia and Herzegovina the question, "How much trust do you have in civil society organisations (CSOs)?" Their replies indicated that 20% totally distrusted them, 27% tended not to trust them, 33% tended to trust them, and 5% totally trusted them. The general degree of public trust in BiH CSOs is 38%.⁶⁵

There was no change in the survey results between 2024 and 2023.

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.

2024	5 – fully meets standards	84%
2023	5 – fully meets standards	89%
2021	4 – meets most standards	78%

In 2024, 84% of CSOs carried out an evaluation of their work in the last year. In 2023, it was 89%, compared to 78% in 2021.

Specifically, 73% said that their organisation had carried out a project-level evaluation, 26% stated they had carried out an evaluation of an internal process, and 16% stated they had carried out an evaluation of a strategy. The CSOs mentioned the reason for not carrying out an evaluation in the last years was that they regularly conduct evaluations of projects together with donors at the end of the project life/cycle; or that they regularly conduct evaluations of the entire programme for one year, and never of just one single project; or that they have external audit evaluations; or that they did not have enough funds to conduct an evaluation.

⁶⁵ Balkan Barometer in six Western Balkan economies, commissioned by the Regional Cooperation Council (RCC), for 2024

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.

2024	4 – meets most standards	80%
2023	5 – fully meets standards	79%
2021	4 – meets most standards	86%

In 2024, 74% of CSOs claimed that their work was based on evidence generated through research. In 2021 the value was also 74%, and in 2023, it was 81%.

The percentage of CSOs who carried out focus group meetings was 35%, surveys of specific groups 42%, and field research 32%. Some CSOs gave examples of their evidence generated through research – for instance, an online survey was conducted aiming to develop the strategy for the upcoming years, or field research was conducted related to the subject of their work through direct research with project beneficiaries, members and partners.

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.

2024	5 – fully meets standards	93%
2023	5 – fully meets standards	96%
2021	5 – fully meets standards	85%

In 2024, 93% of CSO work was informed by consultations with people who had a stake in their current or future work, as compared to 2021, when the results were 85%, whilst in 2023 the figure was 96%.

The percentage of CSOs who consulted about their work with local communities was 61%, with members 61%, and with local authorities 51%; 48% consulted with a public institution, 18% with a national authority, 17% with academic institutions, and 16% with private businesses. In open answers, CSOs said they regularly consult representatives from relevant institutions, academia, the Ombudsman, other CSOs and their beneficiaries, on the development of their CSO strategies.

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.

In 2024, 83% of CSOs took part in local, central or international CSO networks, as compared to 2021, when the proportion was 58%. In 2023, the figure stood at 84%.

Specifically, 57% of CSOs participated in national networks, 37% in international networks, and 41% in local networks, whilst 10 % of CSOs were not part of any network. In some open answers CSOs said that they were usually functioning as an umbrella organisation and therefore included many organisations, or that they were members of boards and networks of CSOs who work in service provision.

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

In 2024, a declining number of CSOs, 45%, said they were engaged in cross-sectoral partnerships with academia, social partners and the private sector, as compared to in 2021, when the figure was 76%. In 2023, the percentage was 57%.

Specifically, 26% of CSOs were engaged in partnerships with universities, and 10% of CSOs with social partners, whilst 21% were engaged with the private sector. In some open answers, CSOs said that they engaged with health institutions, primary schools and similar partners.

SO 3.7. CSO have a diversified funding base.

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

2024	3 – moderately meets standards	60%
2023	3 – moderately meets standards	55%
2021	3 – moderately meets standards	58%

In 2024, 60% of CSOs had no single donor type contributing more than 50% of their funding. In 2023 the figure was 55%, and in 2021 the result was 62%. Fifteen percent of CSOs who participated in the CSO survey said they did not have any donor in 2024. In 2023, the result had been 18%, and in 2021, 7%.

According to the CSO survey results for 2024, 40% of CSOs had at least one type of donor contributing more than 50% of their funding. In 2023, the figure had been 45% of CSOs. In 2021, 38% of CSOs had answered accordingly to the same indicator.

When speaking about donor types, the results showed that, in 2024, 49% of CSOs had funding from foreign private foundations, and 64% from local/provincial/cantonal/entity and national government. Thirty five percent were funded by bilateral donors, 36% by the European Union, 27% by intergovernmental organisations, and 20% by domestic private foundations.

In 2023, by comparison, the survey showed that 62% of CSOs had funding from foreign private foundations, and 62% from local, provincial/cantonal/entity and national government. Forty three percent of organisations were funded by bilateral donors and a similar 43% by the European Union, 26% received funding intergovernmental organisations, and 14% from domestic private foundations.

When analysing the extent to which European Union funds supported CSOs budgets in BIH in 2024, we find that EU funds covered 19% of CSOs from between 1% and 25% of their budgets, with only 4% of CSOs indicating that EU support covered their budgets between 26% and 50%. However, 13% of CSOs reported that the EU provided more than 50% of their annual budget.

In 2024, an important role in the funding of CSOs was played by local governments in BIH. Some 35% of CSOs said that they were funded with up to 25% of their budget by the local government, and 18% of CSOs said they were funded with more than 50% of their budget by local government. Also, significant numbers of provincial/cantonal/entity governments were funding CSOs in BIH in 2024. Some 23% of CSOs were supported with up to 25% of their budget from cantonal/entity governments, and 13% of CSOs said that cantonal/entity governments had supported their budgets with 50% or more.

Less substantial funding for CSOs in BIH in 2024 came from the national government. Some 11% of CSOs were funded with up to 25% of their budget by national government, International CSOs funded 17% of CSOs in BIH with up to 25% of their budget, cantonal/entity governments provided 23% of CSOs up to 25% of their budgets.

The 2023 value for Indicator 3.7.a was originally published as 51%. Following the recalculation of the value to rectify an error, the revised value for 2023 is 55%.

The 2021 value for Indicator 3.7.a was originally published as 62%. Following the recalculation of the value to rectify an error, the revised value for 2021 is 58%.

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.

2024	4 – meets most standards	76%
2023	4 – meets most standards	68%
2021	4 – meets most standards	71%

In 2024, 76% of CSOs raised funds from sources other than government and donors e.g. membership fees, corporate/individual giving and income-generating activities. In 2023, the figure was 68%, and in 2021, 71%.

In 2024, 12% of CSOs in BiH had at least one other source of income apart from government and donors, and 33% of CSOs had at least two other sources, 18% had three other sources. Twenty four percent of CSOs did not have another source of funding in 2024.

In 2024, individual donations scored as the most common source of alternative income, covering 1–25% of funding for 39% of CSOs. Income from membership fees covered 1–25% of funding for 36% of CSOs, and private business covered 1–25% of funding for 22% of CSOs. CSOs' own business/social enterprise activity/service provisions provided income for some 16% of organisations.

The 2023 value for Indicator 3.7.b was originally published as 71%. Following the recalculation of the value to rectify an error, the revised value for 2023 is 68%.

The 2021 value for Indicator 3.7.b was originally published as 71%. Following the recalculation of the value to rectify an error, the revised value for 2021 is 71%.

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

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

In 2024, 58% of CSOs employed staff, whilst in 2021, the result was 65% of CSOs answering accordingly on the same indicator. In 2023, the figure was at 73%. It can be concluded that the change registered between 2023 and 2024 was a 15% decrease, but the overall change between 2021 and 2024 was a 7% decrease.

In 2024, 38% of CSOs reported that they had no paid staff, in comparison with the 2023 result of 26%, 37% of CSOs reported a paid staff of 1–5, compared with 32% in 2023, 11% had a paid staff of 6–10, compared with 20% in 2023, and 10% of CSOs employed 11 or more paid staff, compared with 21% in 2023.

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

2024	1 – does not meet standards	0%
2023	1 – does not meet standards	1%
2021	1 – does not meet standards	0%

In 2024, 0% of CSOs had all nine human resources policies defined as part of this indicator – a recruitment policy, Diversity, Equality and Inclusion policy, disciplinary policy, grievance/complaints policy, performance evaluation policy, redundancy policy, remuneration policy, bullying and harassment policy, and a safeguarding of children and vulnerable adults policy. In 2023, the figure was 1%, as compared to the 2021 results, when 0% of CSOs answered on the same indicator.

The most frequently adopted internal policies were a recruitment policy (34%), a diversity, equality and inclusion policy (37%), a safeguarding of children and vulnerable adult policy (27%), and a performance evaluation policy (31%).

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

In 2024, this indicator was not reviewed.

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

In 2024, 10% of CSOs (in 2023 was 11%) had organisational policies encouraging recruitment of a diverse workforce. In 2023, it was 11%, and in 2021, 20% of CSOs that had such policies.

34% of CSOs (in 2023 was 37%) said they had a diversity, equality and inclusion policy, and 22% of CSOs (in 2023 was 34%) said they had a recruitment policy.

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

2024	5 – fully meets standards	84%
2023	5 – fully meets standards	83%
2021	4 – meets most standards	74%

In 2024, 84% (in 2023, it was 83%) of CSOs said their staff and volunteers had attended a training course in the past year. This compares favourably to 2021, when 74% of CSOs answered accordingly on the same indicator.

References and Laws Consulted

Laws consulted

English	Original language
Laws on Associations and Foundations Brcko District, FBiH, RS, BiH state level	Zakoni o udruženjima i fondacijama Brčko Distrikt, FBiH, RS, nivo države BiH.
Law on Public Assemblies of Central Bosnia Canton	- Zakon o javnim okupljanjima Srednjobosanskog kantona.
«Official Gazette of the Republika Srpska» nos. 64/17, 104/18, Decision of the High Representative, 15/21, 89/21, www.ohr.int - Decision of the High Representative No. 12/23 and «Official Gazette of the Republika Srpska» no. 73 /23.	«Službeni glasnik Republike Srpske» br. 64/17, 104/18, Odluka visokog predstavnika, 15/21, 89/21, www.ohr.int - Odluka visokog predstavnika br. 12/23 i «Službeni glasnik Republike Srpske» br. 73/23.
UN Special Rapporteur on Freedom of Opinion and Expression, OSCE Representative on Freedom of the Media, OAS Special Rapporteur and the African Commission Special Rapporteur on Freedom of Expression and Access to Information (hereinafter “International Mandate-Holders on Freedom of Expression”).	Specijalni izvjestitelj UN-a za slobodu mišljenja i izražavanja, predstavnik OEBS-a za slobodu medija, specijalni izvjestitelj OAS-a i specijalni izvjestitelj Afričke komisije za slobodu izražavanja i pristup informacijama (u daljnjem tekstu „Međunarodni nosioci mandata za slobodu izražavanja“)
2023 Joint Declaration on Media Freedom and Democracy , which specifically provides that “[c]riminal defamation and laws criminalising the criticism of State institutions and officials should be repealed”	- Zajednička deklaracija iz 2023. Zajednička deklaracija o slobodi medija i demokratiji, koja posebno predviđa da „[k]riminalna kleveta i zakoni koji kriminalizuju kritiku državnih institucija i zvaničnika trebaju biti ukinuti“
2021 Joint Declaration on Politicians and Public Officials and Freedom of Expression , para. 2(b)(ii).	Zajednička deklaracija o političarima i javnim službenicima i slobodi izražavanja iz 2021. godine, stav 2(b)(ii).
2010 Joint Declaration on Ten Key Challenges facing Freedom of Expression in the Next Decade .	Zajednička deklaracija iz 2010. godine o deset ključnih izazova s kojima se suočava sloboda izražavanja u sljedećoj deceniji.
Joint Declaration on Defamation of Religions, and Anti-Terrorism and Anti-Extremism Legislation , 15 December 2008.	Zajednička deklaracija o kleveti religija i zakonodavstvu protiv terorizma i ekstremizma, 15. decembar 2008. godine.
UN Convention on the Elimination of All Forms of Discrimination against Women , adopted by General Assembly resolution 34/180 on 18 December 1979.	Konvencija UN-a o eliminaciji svih oblika diskriminacije žena, usvojena rezolucijom Generalne skupštine 34/180 od 18. decembra 1979. godine.
General recommendation No. 35, 2017, on gender-based violence against women, updating general recommendation No. 19, 1992.	Opšta preporuka br. 35 iz 2017. godine o nasilju nad ženama na osnovu spola, kojom se ažurira Opšta preporuka br. 19 iz 1992. godine.

English	Original language
Articles 208a, 208b, and 280a, paragraph (2) of the RS Criminal Code.	Članovi 208a, 208b i 280a, stav (2) Krivičnog zakona RS.
HUDOC - European Court of Human Rights (coe.int).	HUDOC - Evropski sud za ljudska prava (coe.int).
The Criminal Code of BiH, FBiH, RS and Brčko District	Krivični zakon BiH, Federacije BiH, RS i Brčko Distrikta
Criminal Procedure Codes of BiH, FBiH, RS and BD of BiH	Zakoni o krivičnom postupku BiH, Federacije BiH, Republike Srpske i Brčko Distrikta BiH
FBiH, RS and BD of BiH Laws on protection against defamation	Zakoni o zaštiti od klevete u Federaciji BiH, Republici Srpskoj i Brčko Distriktu BiH
Law on the prohibition of discrimination	Zakon o zabrani diskriminacije
Law on Gender Equality which deals with the issues of protection of individuals and legal entities from threats, attacks, judicial harassment and discriminatory treatment	Zakon o ravnopravnosti spolova koji se bavi pitanjima zaštite pojedinaca i pravnih subjekata od prijetnji, napada, sudskog uznemiravanja i diskriminatornog postupanja
Notice on the opening of the public hearing for the draft-working version of the Law on Financing of Civil Society Organizations in FBiH - Federal Ministry of Justice (fmp.gov.ba)	Obavijest o otvaranju javne rasprave za Nacrt-radnu verziju Zakona o finansiranju organizacija civilnog društva u FBiH – Federalno ministarstvo pravde (fmp.gov.ba)
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Monitoring the distribution of public funds to associations and foundations in Bosnia and Herzegovina https://nvo.transparentno.ba/bs-Latn-BA	Praćenje raspodjele javnih sredstava udruženjima i fondacijama u Bosni i Hercegovini https://nvo.transparentno.ba/bs-Latn-BA .

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