



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

DG ENEST Guidelines for EU Support to Civil Society in the Enlargement Region: **2024 Assessment**

REGIONAL ASSESSMENT REPORT 2024



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This study was carried out by a team of researchers under the supervision of the EU TACSO 3 project.

Lead Expert and main author: Snježana Bokulić

Data analyst and survey expert: Dr. Blerina Metanj Subashi

Country Analysis Authors:

Natasha Mazari – Albania

Kanita Kulić – Bosnia and Herzegovina

Sara Salihu – Kosovo

Marija Armenski – North Macedonia

Jelena Pajović van Reenen – Serbia

Özge Konuralp – Türkiye

EU TACSO 3 Team Leader – Richard Allen

Legal Advisors

Prof. assoc. Dr. Ersida Teliti – Albania

Selim Kulić – Bosnia and Herzegovina

Alban Krasniqi – Kosovo

Miljan Vlaović MSc – Montenegro

Goce Kocevski – North Macedonia

Prof. Dejan Vučetić – Serbia

Assoc. Prof. Dr. Ulaş Karan – Türkiye

Proofreading: prof. Jonathan Boulting M.A. (Eng. Lit. Trinity, Cantab)

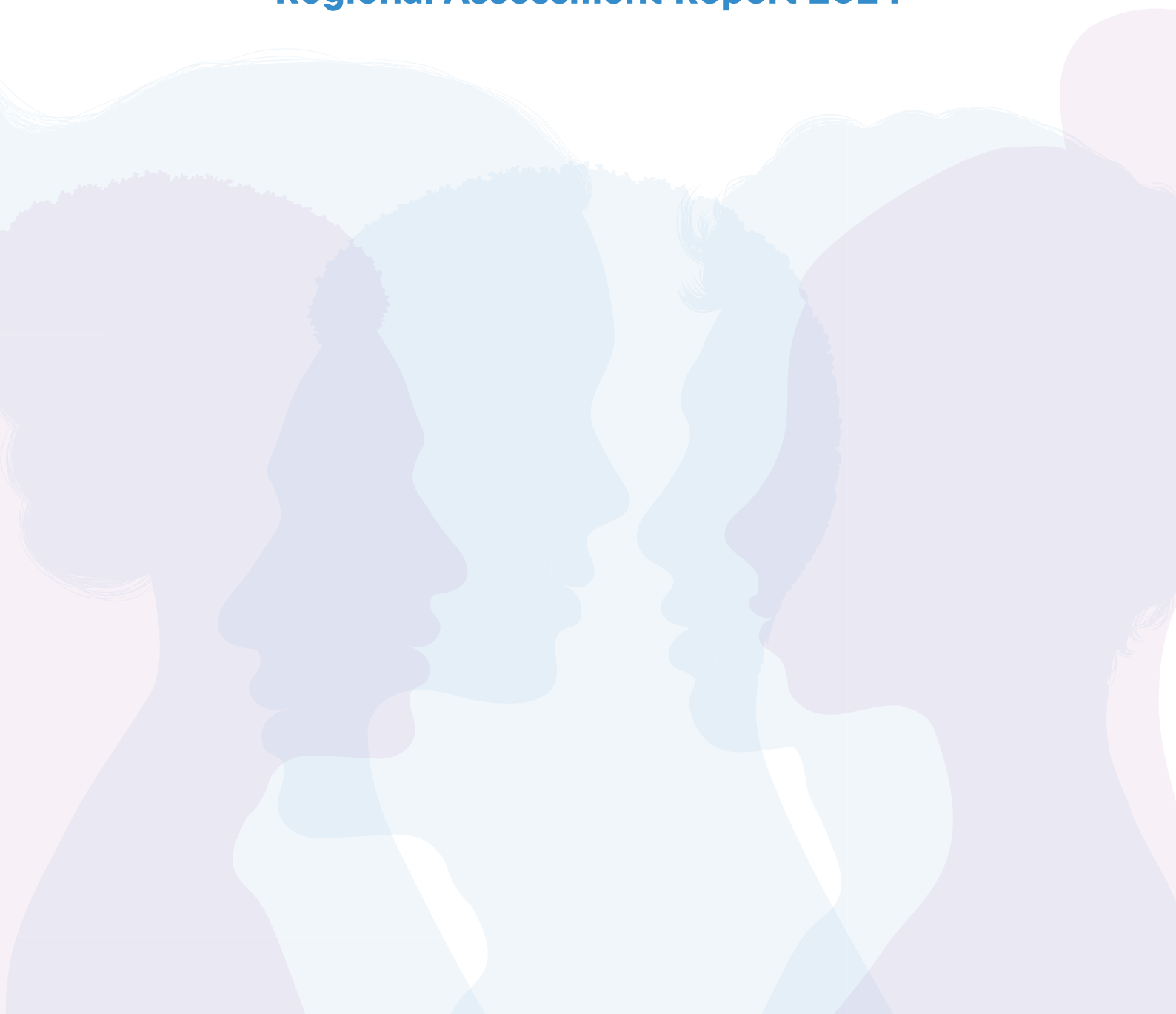
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Regional Assessment Report 2024



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CSO	Civil Society Organisation
DG ENEST	DG ENEST, Directorate-General for Enlargement and Eastern Neighbourhood, part of the European Commission, formerly DG NEAR
EU	European Union
FATF	Financial Action Task Force – an initiative to help countries tackle illicit financial flows
IPA	Instrument for Pre-accession Assistance – an EU financing instrument
LGBTIQ+	Lesbian, gay, bisexual, trans, intersex, queer, '+' minority gender identities and sexualities not explicitly included
SLAPP	Strategic Lawsuit Against Public Participation – a legal tactic used to silence criticism and investigation by media and CSOs
EU TACSO 3	Technical Assistance for Civil Society Organisations – an EU project
USAID	United States Agency for International Development

Executive Summary

This report presents the third assessment against the revised *DG ENEST Guidelines for EU Support to Civil Society in the Enlargement Region, 2021–2027*.¹ The Guidelines outline the results towards which EU support to civil society in the enlargement region aspires during this seven-year period. This assessment provides evidence for the situation against the Guidelines' indicators for 2024, presenting the situation in the region, namely in Albania, Bosnia and Herzegovina, Kosovo,* Montenegro, North Macedonia, Serbia and Türkiye. Examining issues and developments under each specific objective, the report does not present a consolidated regional analysis. Rather, it provides an overview of the most salient developments, positive and negative, in each IPA beneficiary focusing on any change in implementation that occurred in comparison with the previous assessment in 2023, as well as the 2021 baseline, and with a view to identifying trends over time.

The analysis presented in this report is based on data collected from primary and secondary sources by the EU TACSO 3 team. Primary research included surveys of CSOs and public officials, focus group discussions with CSO representatives, interviews with relevant public officials, as well as a legal analysis of relevant laws carried out by external legal experts. Moreover, secondary sources such as reports produced by CSOs, national human rights institutions, governments and others were relied upon for relevant information and data. The CSO survey was circulated broadly and elicited 1,192 valid responses from across the region. The survey of public officials targeted those officials in all IPA beneficiaries with experience of engaging with CSOs or working on CSO issues; it received 95 valid responses.

This report is published at a time of unprecedented global repression of civil society and widespread demonisation of CSOs amidst a deterioration of the international legal order, and the deliberate targeting by state actors of international organisations, including international human rights instruments and mechanisms. Highly concerning developments, including violations of international human rights law, have been taking place principally in the Republika Srpska entity of **Bosnia and Herzegovina** and **Serbia**. However, these developments, current at the time of writing, remain outside the temporal scope of this report given its exclusive focus on 2024.

With regard to 2024, research has shown that, although the results have been mixed at the level of individual countries, the overall trend in the implementation of the Guidelines across the region has been negative for the second consecutive year given an increasingly hostile environment for civil society and shrinking civic space. Cooperation between authorities and civil society continued to require considerable improvement and the momentum provided by the EU accession process with the adoption of Reform Agendas to improve civil society participation in decision-making has largely been a missed opportunity. Similarly to previous years, CSO capacity and resilience remained precarious in the area of organisational accountability, transparency and policy, while CSOs again rated positively in the areas of organisational learning, consultation of stakeholders and financial diversification. Any future improvements have been jeopardised by the increasingly hostile environment, scarcity of funding and lack of overall support for civil society.

¹ Available from https://neighbourhood-enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027_en.

* This designation is without prejudice to positions on status and is in line with UNSCR 1244 and the ICJ opinion on Kosovo Declaration of Independence.

Specific Objective 1

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



A wave of legislative activity was observed across the region, much of it giving rise to serious concerns about restriction of civic space, as only some of it was in compliance with EU accession requirements.

While the environment for civil society remained hostile in **Türkiye**, it continued to deteriorate in **Bosnia and Herzegovina** and **Serbia**. The spectre of 'foreign agents' laws continued to haunt the region as such laws were proposed in **Serbia** and **Türkiye**. Although they did not progress, there remained a possibility that they could be reintroduced in 2025, as has happened in the National Assembly of Republika Srpska where the law was finally adopted in February 2025. Human rights protection was further eroded in Republika Srpska as its Criminal Code was amended to remove the concept of gender identity, thus undermining the protection of the rights and equality of persons of different gender identities, as well as the protection of CSOs advocating for their equality. It was encouraging to note that the highest courts of the land attempted to assert their independence in defence of fundamental freedoms in several countries. Following the recriminalisation of defamation in Republika Srpska, the Constitutional Court of **Bosnia and Herzegovina** ruled that the provisions were unconstitutional, but authorities in Republika Srpska refused to implement the decision. In **Türkiye**, a major development was the Constitutional Court's annulment of certain provisions in the Law on the Prevention of Financing of the Proliferation of Weapons of Mass Destruction, and related amendments to the Law on Associations and the Law on the Collection of Aid. These provisions were found to have granted excessive discretionary powers to the government, among them the authority of the Interior Minister to suspend associations and appoint trustees. No legislative improvements followed however, and, instead, closure proceedings against CSOs and disruptions to their activities continued, increasing the chilling effect on civil society.

On a more positive note, **Albania** and **Kosovo** adopted new legislation on audiovisual media services, while laws on anti-money laundering and countering terrorism financing were adopted in **Bosnia and Herzegovina**, **North Macedonia** and **Serbia**, with the aim of complying with the EU accession requirements.

With regard to the effective realisation of rights, nevertheless, as in previous years, a range of challenges persisted. Freedom of peaceful assembly was curtailed, in particular for environmental and LGBTIQ rights defenders, in **Albania**, **Bosnia and Herzegovina** and **Serbia**. Environmental rights defenders were subjected to excessive use of police force, arbitrary arrests, criminal charges, fines, intimidation and even violence. High-level officials fomented a climate of incitement to violence and discrimination against the LGBTIQ community, as well as an overall atmosphere of fear against activists and human rights defenders.

Although the legal framework for the protection of human rights defenders and journalists from threats, attacks and judicial harassment did not change in 2024, practical protection faced a number of challenges. Defamation remained criminalised in **Bosnia and Herzegovina's** Republika Srpska, **Albania** and **Türkiye**. Other challenges ranged from limited access to an effective remedy due to excessive duration of legal proceedings, an increase in SLAPPs, the rise of anti-gender movements and smear campaigns, hatred and incitement to violence against LGBTIQ activists, harassment of journalists and, in particular, women journalists, including by using spyware to monitor their activities. In this regard, 16% of respondents participating in the CSO survey reported that, in 2024, they or their members were subjected to threats, physical attacks, unlawful searches or inspections or experienced property damage or interference with communications, a proportion comparable to previous years.

While access by CSOs to a broad range of funding, including from abroad, remained unrestricted in 2024, in spite of the various attempts to adopt a 'foreign agents' law, the provision of public funding to CSOs continued to face a range of challenges across the region with regard to transparency, fairness and accountability. It was therefore not surprising that only 14% of respondents to the CSO survey stated that the provision of public funding was transparent and fair, a level comparable to previous years.

Specific Objective 2

Strengthened cooperation and partnership between CSOs and public institutions



Cooperation and partnerships between CSOs and public institutions continued to face challenges. Despite legal frameworks regulating public participation, and the existence of online consultation platforms meant to facilitate it, the inclusion of CSOs in decision- and policy-making was neither systematic nor effective. The impact of the online platforms for public consultation was limited due to low rates of public involvement, infrequent updates, and insufficient information available on them, including limited publication of draft laws. Over-reliance on emergency procedures for the adoption of laws remained a concern in 2024 as well, with proportions of laws adopted without a public consultation process as high as 78% in **North Macedonia**, and 66% in **Albania**. The proportion of participating CSOs reporting that they were effectively consulted in the drafting of laws, bylaws, strategies, and other acts of public interest declined in 2024 to under one-fifth, 19%, the lowest value to date. Where CSOs were of the view that they were effectively consulted, they tended to be larger organisations, as the gap in the perception between large and small organisations grew from 16% in 2021 to 27% in 2024. When good practices did happen, they tended to be an outcome of donor funded projects to develop laws, policies and strategies, rather than a reflection of the institutional commitment to meaningful and effective participation of civil society from the earliest stages of the process.

Challenges were evident also in the context of civil society participation in the EU accession process. A major milestone was achieved when the EU approved the Reform Agendas of **Albania, Kosovo, Montenegro, North Macedonia** and **Serbia** in October 2024. However, at the domestic level, these agendas were adopted often in urgent procedures and without meaningful involvement of civil society. It was a missed opportunity to enable meaningful civil society participation.

Across the region, the CSO perception of the attitude of public officials towards civil society remained largely negative, in line with previous years. In 2024, just over one-fifth, 21%, of participating CSOs reported that, in their view, the attitude of public officials towards civil society was supportive.

The record was mixed across the region with regard to civil society cooperation strategies in force. Such strategies were in place in **Montenegro, North Macedonia** and **Serbia**. In **Albania** and **Kosovo**, they ended in 2023 without the timely development and adoption of a new strategy. It is noteworthy that **Bosnia and Herzegovina** saw the beginning of the consultation process to develop the first ever civil society cooperation strategy at the state level. Nevertheless, civil society cooperation with governments was hindered also by the lack of budgeted action plans in countries where strategies were in place. Moreover, public structures responsible for the implementation of civil society cooperation strategies continued to face challenges similar to previous years, including insufficient human and financial resources, and over-reliance on foreign assistance.

Meaningful inclusion of CSOs in civil society cooperation councils deteriorated in 2024, in comparison with the previous year. The feeling among the members of the Advisory Body of the Council of Ministers of **Bosnia and Herzegovina** for Cooperation with Non-Governmental Organisations was that the body served for window-dressing purposes to tick off EU requirements as the Council of Ministers continued not to engage with it. In **North Macedonia**, the Government Council for Cooperation with the Civil Society Sector remained inactive throughout 2024 due to the continued boycott by civil society representatives. In **Albania**, the National Council for Cooperation with Civil Society did not have an annual workplan in 2024, unlike in the previous year. In **Kosovo**, the Council for Government Cooperation with Civil Society was not operational, as new members were not appointed following the expiration of its mandate in December 2023. In **Serbia**, the Council for the Creation of an Enabling Environment for the Development of Civil Society saw its effectiveness undermined by systemic barriers and the overall hostile environment for civil society as the highest-level political figures continued to defame and stigmatise CSOs.

Specific objective 3**CSO capacity and resilience to carry out their activities effectively are reinforced**

The increasingly hostile environment and the shrinking of the civic space have, inevitably, had an impact on CSO capacity and resilience.

Financial transparency of CSOs has been one casualty of such hostile environment as the proportion of CSOs that reported publishing information such as annual reports and financial statements with sources of funding and amounts received remained low, at just over one-quarter of participating CSOs. For a considerable proportion of respondents, non-publication was a way to mitigate risks of harassment and smear campaigns by avoiding public exposure. Even so, at the regional level, in 2024, the degree of public trust in CSOs rose slightly to 40%, from 38% in 2023. The public continued to trust CSOs more than they did the government, 37%, parliament, 33%, political parties, 23%, and the media, 39%.

With regard to the diversification of the CSO funding base, the situation in 2024 remained similar to previous years both in terms of the diversity of donors and the diversity of sources of funding. The proportion of CSOs not receiving funding from donors, however, increased. Across the region, 54% of participating CSOs reported that no single donor type contributed more than 50% of their income. European Union, foreign private foundations and international NGOs were the most significant donors, providing funding to 55% of participating CSOs, respectively. Moreover, national authorities, including central, regional and local governments, provided funding to 50% of participating CSOs. The proportion of CSOs raising funds from sources other than donors remained similar to previous years with 69% of participating CSOs reporting that they had at least one additional source of other income. The most prevalent sources of non-donor income were individual donations and membership fees. For the majority of CSOs, however, these sources of funding contributed at best about one-quarter of their annual budget. With regard to CSOs reporting that they received no donor funding in 2024, at 25%, their proportion doubled compared to the previous year. These CSOs tended to be small organisations, mostly with annual turnovers of under EUR 5,000, that relied primarily on volunteers and other sources of funding such as membership fees and individual donations.

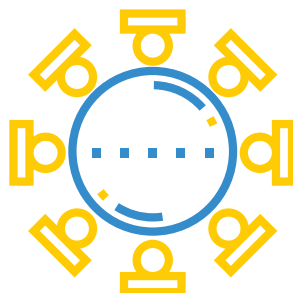
Challenges, moreover, continued with regard to organisational accountability. One such challenge concerned the independence of governing boards given that the proportion of participating CSOs that reported having an independent and effective governing body decreased to 40%. Gender equality in CSOs remained elusive in 2024 as, at 41%, the proportion of CSOs that reported having an organisational gender equality policy was the lowest since 2021. Overall, the lack of organisational policy frameworks remained one of the most significant shortcomings of organisational accountability, as virtually no CSOs reported having in place the package of human resource policies under consideration.

Despite the challenges, CSOs continued to demonstrate strong performance in areas like organisational learning and stakeholder engagement. A consistently high number of CSOs reported a strong commitment to learning processes, evidence-based approaches, and consultations with stakeholders. They also remained active in public communication, with nearly all reporting regular use of online platforms. Facebook remained a key channel, and a significant number of CSOs reported having a website.

	Table of Indicators Awarded Numerical Values	2021							2023							2024						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
Enabling environment																						
1.1.a	Extent to which relevant domestic legislation provides for freedoms of association, assembly and expression	3	4	4	4	4	3	1	3	3	4	4	4	2	1	3	3	4	4	4	2	1
1.2.a	Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights	3	4	3	4	4	3	2	3	4	4	4	4	3	2	3	4	4	4	4	3	2
1.2.b	Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment, in particular:	5	3	4	4	4	3	1	5	2	4	4	4	3	1	4	2	4	4	4	3	1
1.3.a	Extent to which laws to combat extremism, terrorism, money laundering and corruption do not unduly restrict legitimate activities of CSOs	4	2	4	5	4	3	1	4	2	4	5	4	3	1	4	3	4	5	4	3	1
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	5	5	5	5	5	4	1	5	4	5	5	5	4	1	5	4	5	5	5	4	1
1.5.a	Small community/local organisations and civic initiatives are allowed to operate by law without registering	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2
1.5.b	In law, unregistered small community/ local organisations and civic initiatives enjoy the same right to participation in decision making processes as registered CSOs	4	4	4	3	4	5	2	4	4	4	3	4	5	2	4	4	4	3	4	4	2
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:	5	4	5	5	4	5	2	5	3	5	5	4	5	2	5	3	5	5	5	5	2
1.7.a	The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law	1	1	4	5	1	2	1	1	1	4	5	2	2	1	1	1	4	5	2	2	1
1.7.c	Extent to which legal provisions regulating the award of public funding to CSOs ensure that it is clear, impartial and well regulated	3	3	4	3	2	2	1	4	3	4	3	2	2	1	4	3	4	3	2	2	1
1.7.d	Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards	1	2	4	5	2	2	2	1	2	4	5	2	2	2	2	2	4	5	2	3	2
1.7.e	Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory	2	1	1	1	1	1	1	1	1	2	1	1	1	1	1	2	2	1	1	1	1
1.8.a	Tax legislation allows for tax relief as regards individual and corporate giving	2	3	5	3	3	3	2	2	3	5	3	3	3	2	2	3	5	3	3	3	2
1.9.a	Extent to which applicable tax laws provide for appropriate tax benefits for CSOs	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
1.10.a	Laws regulating volunteering are adopted	2	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1
1.10.b	Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation	1	3	2	1	3	2	1	1	3	2	1	3	3	1	1	1	2	1	3	3	1

	Table of Indicators Awarded Numerical Values	2021							2023							2024						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
Government - civil society cooperation																						
2.1.a	Laws, bylaws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs	3	2	3	4	2	2	1	3	2	3	4	2	1	1	3	2	3	4	2	2	1
2.2.a	Extent to which CSOs assess the attitude of public officials towards civil society as supportive	2	1	2	1	1	1	1	2	2	2	1	2	1	2	3	1	2	1	1	1	2
2.3.b	IPA beneficiaries have adopted currently valid civil society cooperation strategies	5	1	5	1	1	1	1	5	1	5	5	5	5	1	1	1	1	5	5	5	1
2.3.c	Civil society cooperation strategies are accompanied by adopted budgeted action plans	1	1	5	1	1	1	1	1	1	5	5	3	5	1	1	1	1	5	3	1	1
2.3.f	Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs:	4	4	3	3	5	1	2	4	4	3	1	1	4	2	3	4	1	1	1	3	1
CSO Capacity and Accountability																						
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	3	3	3	3	2	3	2	4	3	3	3	3	3	3	3	3	3	2	3	3	2
3.1.b	Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body	1	1	2	1	2	1	1	2	1	2	1	1	1	1	2	1	2	1	1	1	1
3.1.c	Proportion of CSOs that share relevant information on their organisation using means and channels that are accessible to all stakeholders	2	2	2	2	2	1	3	1	1	1	1	3	1	3	1	2	1	2	2	1	3
3.1.d	Proportion of CSOs that have an organisational gender equality policy	3	2	3	2	2	3	3	3	2	3	2	2	2	3	3	2	3	2	2	3	3
3.1.e	Proportion of CSOs that have an organisational strategy, including vision, mission, and goals	4	3	4	3	5	4	3	4	4	4	3	4	3	4	4	4	4	4	4	4	3
3.2.a	Proportion of CSOs that have at least one on-line channel of communication	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
3.3.a	Proportion of CSOs that publish their annual reports and financial statements	3	3	3	3	4	3	3	2	3	2	2	3	2	2	2	2	1	2	3	2	2
3.3.b	Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year	2	2	2	2	2	2	2	2	2	1	2	2	1	2	2	2	2	2	2	2	1
3.4.a	Proportion of CSOs that have carried out an evaluation of their work in the last year	5	4	4	4	4	5	5	5	5	4	4	5	4	5	5	5	4	5	4	4	4
3.5.a	Proportion of CSOs whose work is based on evidence generated through research	5	4	5	4	4	5	5	5	5	4	5	4	4	5	5	4	5	4	4	4	4
3.5.b	Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
3.7.a	Proportion of CSOs whose sources of donor income are diversified	4	4	3	3	3	3	4	3	3	3	4	3	4	4	3	3	3	3	3	3	3
3.7.b	Proportion of CSOs raising funds from sources other than donors e.g. membership fees, corporate/ individual giving and income generating activities	4	4	4	3	5	4	5	4	4	3	3	4	4	5	3	4	3	3	4	4	4
3.8.b	Proportion of CSOs that have organisational human resources policies	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
3.8.e	Proportion of CSOs whose staff and volunteers have attended a training course in the past year	4	4	4	5	5	5	4	5	5	4	5	5	4	5	4	5	4	5	5	5	4

Introduction



This report presents the third assessment against the revised *DG ENEST Guidelines for EU Support to Civil Society in the Enlargement Region, 2021–2027*.² The Guidelines outline the results toward which EU support to civil society in the enlargement region aspires during this seven-year period. This assessment provides evidence for the situation against the Guidelines' indicators for 2024 and compares the results against the previous assessment in 2023, as well as the 2021 baseline.

Consisting of 59 indicators compiled under 21 specific objectives, the Guidelines address three outcomes critical for healthy participatory democracies in which a strengthened civil society contributes to the EU approximation and integration processes in the region. The three outcomes recognise that (1) a conducive environment for civil society to carry out its activities is a fundamental precondition of democracy; that (2) strengthened cooperation and partnership between CSOs and public institutions is integral to participatory democracy, and that (3) reinforced CSO capacity and resilience to carry out their activities effectively are necessary so that CSOs can be credible and productive actors in society. The indicators, in turn, are based on international standards, including EU Rule of Law Acquis, international human rights law and CSO accountability standards, and informed by recommendations, opinions and guidelines adopted by international organisations and inter-governmental fora.

The annual assessment against the indicators provides all stakeholders – EU staff, CSOs in the region, and national policy-makers and officials – with a detailed set of data showing the degree of progress toward the three main objectives. This report presents the assessment of the situation in the region, namely in Albania, Bosnia and Herzegovina, Kosovo,* Montenegro,³ North Macedonia, Serbia and Türkiye, in 2024.

Examining issues and developments under each specific objective, the report does not present a consolidated regional analysis. Rather, it provides an overview of the most salient developments, positive and negative, in each IPA beneficiary focusing on any change in implementation that occurred in comparison with previous assessments, and with a view to identifying trends over time.

This regional report is accompanied by six country-level reports plus reference annexes. The methodology is explained in the next section, followed by the presentation of findings and conclusions for each specific objective under the three areas. The report should be read in conjunction with country-level reports which provide a more detailed analysis of the indicators. A separate annex provides the data collected through the survey of CSOs.

The country-level reports provide references to sources of data. For ease of reading, the regional report includes references to sources only where the data is not explicitly referred to in the country-level reports.

This year's report also includes information from complementary research based on the findings of the 2021 and 2023 assessment reports. This Deep Dive research investigated three key issues: financial sustainability, constituency engagement and human resources management. The study drew from Assessment data, as well as extensive interviews and focus groups with CSOs in all IPA beneficiaries. Short summaries of the findings are included under Objective 3. Further information is available in the full Deep Dives report, available separately in the EU TACSO 3 document library <https://library.tacso.eu/>.

The full Guidelines and their Explanatory Note with a detailed explanation of each indicator, and its basis in international law and standards, can be found at <https://tacso.eu/eu-civil-society-guidelines/>.

² * This designation is without prejudice to positions on status and is in line with UNSCR 1244 and the ICJ opinion on Kosovo Declaration of Independence. Available from https://neighbourhood-enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027_en.

³ Only partial assessment for Montenegro is included. The full analysis, including ratings, will be published separately in the Montenegro Country Report.

Methodology



The analysis presented in this report is based on data collected from primary and secondary sources by the EU TACSO 3 team. The research team comprised seven Country Coordinators, a Statistics and Survey Expert, and a Lead Expert, under the overall coordination of the EU TACSO 3 Team Leader. As with previous assessments, primary research included surveys of CSOs and public officials, focus group discussions with CSO representatives, interviews with relevant public officials, as well as a legal analysis of relevant laws carried out by external legal experts. Moreover, secondary sources such as reports produced by CSOs, national human rights institutions, governments and others were relied upon for relevant information and data. The data collected refers to 2024 or, when data for 2024 was not available, to 2023.

The CSO survey was run in all IPA beneficiaries; the data collection period was between 19 January and 10 February 2025. The aim of the survey was to gauge the perspectives of civil society actors in the region on all applicable indicators. It consisted mostly of closed questions. To enable comparisons with previous assessments, the same survey was used.⁴ As previously, the questionnaire was available in all official languages, in addition to English, and was circulated broadly on social media, through the EU National Resource Centres for Civil Society, and to more than 10,000 contacts in the EU TACSO 3 database. The survey was anonymous.

The survey of public officials was run in all IPA beneficiaries; the data collection period was between 10 February and 3 March 2025. The aim of the survey was to collect the perspectives on specific relevant indicators of selected public officials who, in their work, engaged closely with CSOs. The survey consisted of a mix of closed and open-ended questions. The survey questionnaire, available in all official languages, in addition to English, was circulated to public officials at the level of central, regional and local governments known to have experience in working with CSOs. These were officials known to EU TACSO 3 from previous cooperation. The survey was anonymous.

A team of seven legal advisors – each an expert in their own jurisdiction – was engaged to provide legal analysis of relevant domestic laws, and, in particular, to highlight any changes which may have taken place in 2024. The analysis related to those indicators which assessed the compliance of domestic legislation with international standards.

EU TACSO 3 Country Coordinators, in addition, carried out a series of focus group discussions and key stakeholder interviews with interlocutors from among CSOs and government institutions to collect information on the effectiveness of the cooperation between governments and civil society. These interlocutors were members of civil society cooperation councils and officials responsible for cooperation with civil society. In total, 50 discussants (32 women, 18 men) took part in nine focus group discussions in all IPA beneficiaries, with the exception of **North Macedonia** where the civil society cooperation council was not operational and **Montenegro**. Five interlocutors (three women, two men) were interviewed. Moreover, Country Coordinators reviewed a variety of documents such as CSO reports on a range of issues, reports by national human rights institutions, statistical data published by relevant authorities, and national reports on CSO development.

⁴ A small number of questions were edited for clarity, without changing their meaning or the type of data that was collected.

The data collected informed the analysis of the situation in 2024 in each IPA beneficiary against indicators under review.⁵ The indicators were reviewed and assessed following 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 justification of the assessment is available in the respective country reports and related analysis in Annexes 1–7.

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

The analysis at the level of each IPA beneficiary provided the basis for this comprehensive report. The report compiles the assessments and level of implementation of individual indicators following the structure of specific objectives under each of the three areas as shown on the next page. It should be read in conjunction with the respective country reports as the same level of analysis was not repeated in order to avoid duplication.

⁵ The following indicators were not reviewed for 2024: 2.1.b; 2.1.c; 3.2.b; 3.8.c. These indicators were excluded from the review because data collection for their assessment was not feasible or because the language of the indicator was insufficiently specific to enable consistent and reliable data collection and analysis.

Summary of Specific Objectives		
Objective 1	Objective 2	Objective 3
A conducive environment for civil society to carry out its activities is in place	Strengthened cooperation and partnership between CSOs and public institutions	CSO capacity and resilience to carry out their activities effectively are reinforced
SO 1.1. All individuals and legal entities in the Enlargement region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely SO 1.2. Public authorities protect CSOs from interference and attacks and respect their right to privacy SO 1.3. Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate, in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression SO 1.4. Public authorities treat all CSOs equally with regards to their operations, and equitably with other entities (such as businesses) SO 1.5. Central and/or local public authorities have enabling policies and rules for small community organizations and civic initiatives (grass-roots organisations) SO 1.6. All CSOs are free to solicit and receive funding SO 1.7. Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner SO 1.8. Individuals and corporations enjoy tax benefits for their donations to CSOs SO 1.9. Tax benefits are available to CSOs SO 1.10. The policies and legal environment provide incentives and facilitate volunteering and employment in CSOs	SO 2.1. Public authorities and institutions include CSOs in decision- and policy-making processes SO 2.2. Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes SO 2.3. Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms	SO 3.1. CSOs' internal governance structures follow the principles of good governance SO 3.2. CSOs are able to communicate the results of their activities to the public SO 3.3. CSOs are transparent about their programme activities and sources of funding SO 3.4. CSOs monitor and evaluate the results and impact of their work SO 3.5. CSOs use research and evidence to underpin their work SO 3.6. CSOs work in fair and respectful partnerships to achieve shared goals SO 3.7. CSOs have a diversified funding base SO 3.8. CSOs have effective, empowered and developed human resources

Country report findings were validated in consultation workshops held in each IPA beneficiary in April and May 2025, with the exception of **Montenegro**. In total, 145 participants (102 women, 43 men) took part in six online consultation workshops. Participation in validation workshops was open to all, including CSO representatives, public officials and EU officials. Consultation workshops took place online, in the official language(s) and English, and each lasted up to two hours. Regional report findings were validated in a consultation workshop on 28 May 2025. The workshop was held online with 45 participants (35 women, 10 men). The feedback received informed the changes to the respective reports.

Survey response

CSO survey

The CSO survey was circulated broadly and elicited 1,667 responses. The data cleaning process excluded multiple responses from the same organisation as well as respondents who indicated that they did not belong to the target group or dropped out of the survey without providing the requisite number of responses. Following this, 1,192 valid responses, corresponding to the same number of CSOs, formed the basis for the data analysis. As the number of responses increased for each IPA beneficiary, the 2024 sample was significantly larger than in the previous years; the increase was 31% compared to 2023 and 75% compared to 2021.⁶ With the exception of **Türkiye** where the share of responses increased by 14% compared to 2023, and **Serbia** where it fell by 7%, the proportion of other countries in the sample remained generally similar to previous years.

# of responses and share in total responses, per IPA beneficiary						
	2024		2023		2021	
Albania	114	10%	107	12%	80	12%
Bosnia and Herzegovina	120	10%	116	13%	89	13%
Kosovo	116	10%	105	12%	70	10%
Montenegro	130	11%	122	13%	106	16%
North Macedonia	201	17%	141	15%	80	12%
Serbia	147	12%	175	19%	91	13%
Türkiye	364	30%	142	16%	165	24%
Total	1,192	100%	908	100%	681	100%

At the regional level, the profile of participating CSOs remained largely the same when compared to 2023. Minor differences were noted in that a higher proportion of respondents were chairs, presidents or members of boards, 28% compared to 10% in 2023 who tended to be older, as the proportion of those aged 51 or more increased from 34% to 42%. Participating CSOs tended to be more recently established as the proportion of those founded between 2021–2023 increased from 9% to 14%, and they tended to be smaller organisations as the proportion of participating CSOs with annual turnovers of under EUR 5,000 grew from 13% to 18%, while the proportion of those with annual turnovers between EUR 100,001 and 500,000 dropped from 21% to 16%.

In 2024, almost two-thirds of respondents, 66%, were senior officers within the organisation, including executive directors, senior managers and board members. The majority of respondents, 55%, identified as women while only 1.6% did not select a binary identification. More than four-fifths of respondents, 90%, were aged 31 or older. Those aged 51 or more constituted the largest proportion of respondents, 42%, while 8% were under 30.

Just over one-fifth of respondents, 22%, identified as belonging to a community, minority or marginalised group. As regards their identification with such a group, 3% of all respondents identified as persons with disabilities while 2% of all respondents identified as belonging to the Roma, Ashkali or Egyptian communities, or as LGBTIQ.

More than one-third of participating CSOs, 36%, were established between 2011–2021, and they constituted the highest proportion of respondents. A minority of 8% of participating CSOs were established in 1990 or earlier. Moreover, 14% of participating CSOs were established between 2021–2023. Virtually all

⁶ The response rate for 2021 was revised in line with the methodological approach adopted from 2023 onward: a response was considered valid if, beyond demographic data, sufficient questions were answered to enable the calculation of one indicator. The number of valid responses was therefore revised downward from 766 to 681.

respondents, 98%, came from officially registered organisations. More than four-fifths of participating CSOs, 84%, were registered as citizens' associations; 8% were foundations. With regard to subnational level of participation, 51% of respondents indicated that their CSOs were based in capital cities,⁷ at a level comparable to 2023.

One-quarter of participating CSOs, 25%, worked exclusively at the national level while 17% worked only at the local level. Moreover, 34% of participating CSOs worked internationally in addition to domestically.

The highest proportion of CSOs participating in the survey, 24%, worked on human rights, followed by youth and youth rights, and education, research and innovation, 20%; environment and climate action, 19%; and social inclusion, 17%. Moreover, 12% of participating CSOs worked on gender equality and LGBTIQ rights, followed by 10% working on the rights of persons with disabilities; eight percent worked on minority rights and non-discrimination, and 7% worked on children's rights.

More than one-half of participating CSOs, 58%, were small organisations with 1–10 permanent, full or part-time staff and volunteers working at the time of the survey. Only 7% of participating CSOs engaged 51 or more staff and volunteers. Two-fifths of participating CSOs, 39%, had an annual turnover of up to EUR 25,000. For 16% of respondents, the annual turnover of their CSO was between EUR 100,001 and EUR 500,000, while 8% stated that the annual turnover of their organisation exceeded EUR 500,000; 8% stated that they had no annual turnover.

Public authorities survey

The survey of public officials targeted those public officials at the central, regional and local levels of government who had experience in engaging with CSOs or working on CSO issues; it received 126 responses. Following the data cleaning process, 95 valid responses formed the basis for the data analysis, at a level comparable to 2023.

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

Most respondents, 33%, came from **Serbia**, the fewest again from **Türkiye**: only 1 valid response was received in spite of repeated attempts to ensure participation in the survey. Almost two-thirds of respondents, 61%, worked at the level of cantonal or local government. The nature of their cooperation with CSOs consisted generally of distribution of grants to CSOs – 47% of respondents, and consultation in law- and policy-making – 51% of respondents.

The majority of respondents, 57%, were women, while 4% did not select a binary identification. More than two-thirds of respondents, 71%, were aged 41 or older. Fifteen percent of respondents self-identified as belonging to a community, minority or marginalised group.

⁷ For Bosnia and Herzegovina, the calculation included also Banja Luka; for Türkiye, it included also Istanbul and Izmir.

Research constraints

The research faced certain challenges with regard to data collection.

Where indicators relied on public data which was not available for 2024, 2023 data was used.

With regard to surveys, the survey of public authorities covered only those officials who worked on or with civil society. Their numbers were limited, and they were approached through EU TACSO 3's existing contacts or through referrals. However, as in 2023, the survey included the subnational and local level of governments, and the number of valid responses received was similar. The data collected serves to give an indication of the views of public officials who work with civil society. However, the sample cannot be considered representative of *all* public officials.

The CSO survey was open to any CSO representative willing to participate. Given that this was an online survey, distributed through online channels only, albeit in all official languages, its reach was limited to those CSOs that had internet access. 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. Because respondents were not obliged to complete the survey, the number of responses per question decreased as the survey progressed. Moreover, given that the distribution of responses per IPA beneficiary cannot be shown to be proportional to the total CSO population, survey results are not necessarily representative of the region as a whole. Nevertheless, the number of responses was sufficient to provide valid data on which the analysis is based. While it was not possible to determine the size of the relevant CSO population for each IPA beneficiary, given the lack of reliable data on the number of active CSOs within the definition relied upon in this exercise, based on the number of valid responses received, the maximum average margin of error was up to 9% for each country. This margin of error has been statistically calculated using the number of CSOs listed in official CSO registers in each IPA beneficiary to determine the size of the respective populations.⁸ The assessment of indicators under Specific Objective 3 was based on the self-assessment provided by CSO respondents; as such, the assessment is not necessarily representative of the sector as a whole but indicative for the sample that participated in the survey.

While the drafting process relied on extensive consultation with representatives from CSOs, public authorities and EU delegations, draft reports which served as the basis for the validation process were made available in English only. Although interpretation into official languages was available during country-level validation workshops, the availability of the draft reports only in English limited the ability of CSOs and public authorities to review the text and provide comments.

⁸ See Annex 8 for the calculation of the respective margins of error.



Specific Objective 1

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

This report is published at a time of unprecedented global repression of civil society amidst a deterioration of the international legal order, and the deliberate targeting by state actors of international organisations, including international human rights instruments and mechanisms. Demonisation of CSOs has become widespread, further facilitated by the demise of USAID. Following the recent electoral shift to the right, threats to the CSO sector have been prominent in Brussels too, with attempts to restrict CSO influence in EU policymaking under the guise of transparency in how EU funding is allocated to CSOs.⁹ Closer to home, a ‘foreign agents’ law was adopted in the Republika Srpska entity of **Bosnia and Herzegovina** in February 2025, while in some cantons, the internet has been declared a public space in law, giving rise to serious concerns about the ability to safeguard freedom of expression. It is of further concern, however, that the country is facing constitutional gridlock as Republika Srpska refuses to implement the decisions of the Constitutional Court and other state bodies. In **Serbia**, official attempts to quell mass peaceful protests have led to such violations of freedom of peaceful assembly that the European Court of Human Rights issued an interim measure requiring the government to prevent any future use of acoustic devices for crowd control during demonstrations.¹⁰ Other notable violations¹¹ include precluding journalists and human rights defenders from other countries to monitor the human rights situation through expulsions and denials of entry. Nevertheless, these recent developments remain mostly outside the scope of this report given its exclusive focus on 2024.

During 2024, the conducive environment for civil society to carry out its activities saw major setbacks and decline across the region. While the environment for civil society remained hostile in **Türkiye**, it continued to deteriorate in **Bosnia and Herzegovina** and **Serbia**.

A wave of legislative activity was observed across the region, much of it giving rise to serious concerns about restriction of civic space, as only some of it was in compliance with EU accession requirements. Although the law on ‘foreign agents’ was withdrawn from the National Assembly of Republika Srpska in May 2024, a similar law proposing the creation of a registry of ‘agents of foreign influence’ was submitted to Parliament in **Serbia** in November 2024. In **Türkiye**, amendments to the penal code were proposed which would criminalise ‘agents of influence’ for actions ‘in line with the strategic interests or instructions of a foreign state or organisation, to the detriment of the security or domestic or foreign political interests of the State.’ Although the proposals did not progress in both countries, there remained a possibility that they could be reintroduced in 2025. Of further concern was the adoption of amendments to the Criminal Code of Republika Srpska which removed the concept of gender identity thus undermining the protection of the rights and equality of persons of different gender identities, as well as the protection of CSOs advocating for their equality.

On the other hand, **Albania** and **Kosovo** adopted new legislation in compliance with the EU Audiovisual Services Directive, albeit not without challenges. Similarly, laws on anti-money laundering and counter-terror financing were adopted in **Bosnia and Herzegovina**, **North Macedonia** and **Serbia** with the aim of complying with the EU accession requirements. While the laws were intended to align with international standards, concerns nevertheless arose about potential risks that disproportionate obligations may be imposed on CSOs. This is because CSOs were formally designated as reporting entities which required them to conduct risk assessments, establish internal controls and fulfil reporting duties without a completed sectoral risk assessment.

It was encouraging to see that, in several countries, a series of rulings by the highest courts demon-

⁹ Politico, <https://www.politico.eu/article/european-peoples-party-epp-ngo-funding-civil-society-far-right/>

¹⁰ ECtHR, <https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-8218363-11546489&filename=Interim%20measure%20is-sued%20in%20sonic-weapon%20case.pdf>

¹¹ OSCE, Document of the Moscow Meeting, 1991, paragraph 43.2.

strated instances of an independent judiciary actively upholding fundamental freedoms. Regrettably, their implementation by governments was inconsistent. Following the recriminalisation of defamation in Republika Srpska, the Constitutional Court of **Bosnia and Herzegovina** ruled that the provisions were unconstitutional, but authorities in Republika Srpska refused to implement the decision. In **Türkiye**, a major development was the Constitutional Court's annulment of certain provisions in the Law on the Prevention of Financing of the Proliferation of Weapons of Mass Destruction, and related amendments to the Law on Associations and the Law on the Collection of Aid. These provisions were found to have granted excessive discretionary powers to the government, among them the authority of the Interior Minister to suspend associations and appoint trustees. No legislative improvements followed however, and, instead, closure proceedings against CSOs and disruptions to their activities continued, increasing the chilling effect on civil society.

In the same vein, in October 2024, in **North Macedonia**, the Judicial Council issued a public reprimand against a judge who had excluded the media and the public from a hearing in a case of significant public interest. The decision was clear that excluding the public from court hearings constituted a serious violation of transparency and the right to information, both of which were essential for media freedom. Moreover, the Constitutional Court found violations of the rights of journalists to public expression in two cases, overturning previous decisions by the Civil and Appellate Courts that failed to sanction situations in which journalists were prevented from covering events. The Court emphasized that the state must create conditions that allowed journalists to report freely. In **Serbia**, the Supreme Court ruled that critical commentary, especially in public debates, should not be restricted by the state, finding in favour of press freedom.

Also in **Serbia**, the Constitutional Court, took a different stance when it upheld a fine for defamation against an activist who criticised a public official, finding that the comments exceeded permissible criticism and violated the official's dignity, although a dissenting judge warned of a potential chilling effect on public discourse. The investigative portal KRIK was ordered to pay compensation and cover the costs of proceedings after losing two cases where damage to reputation and honour, and violation of the presumption of innocence were alleged. KRIK's appeal is currently pending before the Supreme Court.

As in previous years, the effective exercise of freedom of peaceful assembly remained a challenge across the region, in particular for environmental and LGBTIQ rights defenders. In **Albania**, in a number of environmental protests, protesters were arrested and criminally charged, although, subsequently, they were generally acquitted by courts. In **Bosnia and Herzegovina**, environmental and labour rights protesters faced misdemeanour fines, intimidation and even violence. In Republika Srpska, high-level officials fomented a climate of incitement to violence and discrimination against the LGBTIQ community. In **Serbia**, some assemblies were banned, while environmental rights defenders suffered excessive use of force by the police, arrests and detention of activists, interrogation by the police and arbitrary tax audits. As mass protests erupted against a planned lithium mine, dozens of activists were arrested in 17 cities across the country in August 2024. While most detentions were brief, their use by authorities was seen as an intimidation tactic. Subsequent mass protests, which followed the collapse of the canopy of a newly renovated railway station in Novi Sad in November 2024 which killed 16 people, were met with increased government repression, police brutality, physical violence against the protesters, intimidation and arbitrary arrests. Pro-government media campaigns sought to delegitimise protests, portraying the activists as 'foreign agents' and fuelling an atmosphere of fear.

Although the legal framework for the protection of human rights defenders and journalists from threats, attacks and judicial harassment did not change in 2024, practical protection faced a number of challenges. Defamation remained criminalised in **Bosnia and Herzegovina's** Republika Srpska, Albania and **Türkiye**. Other challenges ranged from limited access to an effective remedy due to excessive duration of legal proceedings in a number of countries, an increase in SLAPPs, despite the progress that was made with the EU adopting its Anti-SLAPP Directive and the Council of Europe adopting a Recommendation on combating SLAPPs,¹² the rise of anti-gender movements and smear campaigns, hatred and

¹² CASE, https://www.the-case.eu/wp-content/uploads/2024/12/CASE-2024-report-vf_compressed-1.pdf.

incitement to violence against LGBTIQ activists, harassment of journalists and, in particular, women journalists, including by using spyware to monitor their activities. In this regard, 16% of respondents participating in the CSO survey reported that, in 2024, they or their members were subjected to threats, physical attacks, unlawful searches or inspections or experienced property damage or interference with communications, a proportion comparable to previous years.

While access by CSOs to a broad range of funding, including from abroad, remained unrestricted in 2024, in spite of the various attempts to adopt a 'foreign agents' law, the provision of public funding to CSOs continued to face a range of challenges across the region. **Montenegro** remained the only country in the region where the level of public funding was set in law, namely the Law on Non-Governmental Organisations, which required the government to allocate at least 0.5% of the annual budget to CSO funding. In **North Macedonia**, while the level of CSO funding was not set in law, the Action Plan of the Strategy for Cooperation with Civil Society 2022–2024 stipulated that state funding should cover 30% of the total CSO turnover in 2024; nevertheless, this level of funding was not reached in the state budget. With regard to laws that regulated the award of public funding to CSOs, and the transparency and impartiality of the procedure, the record remained mixed and unchanged in 2024. The general challenge was the lack of unified and inclusive regulatory frameworks which would require all public bodies to follow the same standards, criteria and procedures. Deficiencies in laws and practices enabled situations such as in **Serbia** where funding was awarded to organisations which did not meet the formal eligibility requirements or to fictitious organisations that effectively did not exist.

Once funding was allocated, the next challenge in a number of countries was the availability of published information on awards that was detailed enough to enable the identification of individual awards. Where some information was published, it lacked sufficient detail or was not updated sufficiently frequently. It was therefore not surprising that only 14% of respondents to the CSO survey stated that the provision of public funding was transparent and fair, a level comparable to previous years. At 46% of participating CSOs, a 5% drop in the proportion of CSOs that applied for public funding was observed in 2024. Of these, 70% had unsuccessful applications. When asked why they thought their application was unsuccessful, 55% of unsuccessful applicants stated that authorities funded their preferred organisations; 13% were of the view that authorities did not want to fund the work of the people they served and represented. Nevertheless, as in previous years, it did not appear that CSOs working on various aspects of human rights were at a particular disadvantage: 66% of such CSOs had unsuccessful applications; this proportion was 74% for CSOs that did not work on human rights.

A more detailed overview of research results by each specific objective is presented below while the assessment of the respective indicators and related analysis for each IPA beneficiary is included in the Annexes 1–7.

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

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

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

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

In 2024, protection and exercise of the rights to freedom of association, freedom of peaceful assembly and freedom of expression further declined across the region. Deterioration was again noticeable in particular in **Bosnia and Herzegovina** and **Serbia**. A hostile environment for CSOs persisted in **Türkiye**, in spite of several Constitutional Court decisions safeguarding these fundamental rights.

Several legislative changes were adopted with positive effects on the legal framework, but also some with the intention to restrict rights. After Republika Srpska the previous year, in 2024, the ‘foreign agents’ law surfaced in **Serbia**, as a draft law proposing the creation of a registry of ‘agents of foreign influence’ was submitted to Parliament. Lacking support from the ruling coalition, the draft law made no progress. However, the proponent of the law, also a member of the ruling coalition, vowed to further pursue its adoption. In **Türkiye**, amendments to the Penal Code were proposed which would criminalise ‘agents of influence’ for actions ‘in line with the strategic interests or instructions of a foreign state or organisation to the detriment of the security or domestic or foreign political interests of the State.’ Although withdrawn, there remained a possibility that the law would be reintroduced in 2025.

In **Bosnia and Herzegovina**, the Draft Law on the Special Registry and Publicity of the Work of Non-Profit Organisations, was withdrawn by the National Assembly of Republika Srpska in May 2024, only to be adopted in February 2025. Moreover, Republika Srpska’s Criminal Code was amended to remove the concept of gender identity which undermined the protection of the rights and equality of persons of different gender identities, as well as the protection of CSOs advocating for their equality. While the legal protection of freedom of peaceful assembly improved in three cantons where relevant laws were amended to better align with international standards, and the adoption of the same amendments was pending in a fourth canton, freedom of expression was under attack in both entities and some cantons. The National Assembly of Republika Srpska established a working group, in November 2024, to draft a new media law, prompting concerns about new attacks on the freedom of the media. Amendments to the Criminal Code of the Federation of Bosnia and Herzegovina criminalising ‘unauthorised use of personal data’ were referred to parliamentary procedure, giving rise to concerns about potential for abuse and limiting of transparency, media freedom and overall freedom of expression. Also in the Federation, two cantons were considering categorising the internet and electronic media as public spaces and creating the offence of ‘spreading fake news.’ These amendments were not introduced in 2024.

With regard to tackling disinformation and foreign interference, in **Albania**, Parliament established an ad hoc committee. It did so, however, without the support from the opposition and amidst civil soci-

ety concerns that the establishment of the committee with an overly broad mandate was rushed, and, therefore, it constituted potentially another tool to intimidate and silence critical voices, including of journalists, ahead of the general parliamentary elections in 2025. Following calls from civil society to review its mandate, the committee extended invitations for the submission of input from CSOs, academic institutions, media outlets and international experts, extending its focus beyond disinformation to include foreign interference in democratic processes more broadly.

In compliance with the EU Audiovisual Services Directive, **Albania** and **Kosovo** adopted new legislation. In **Albania**, the Audiovisual Media Authority approved the regulation on the changes in the ownership of the audiovisual media service providers which make public any information regarding the ownership structure and beneficial owners of media companies. In **Kosovo**, the Law on the Independent Media Commission was adopted which regulates the governance of audiovisual media services. Although the intention was to align with EU law, the law contains a number of deficiencies with regard to the categorisation of different media services, safeguards for editorial independence, transparency of media ownership, and the institutional autonomy of the Commission. The law was submitted for constitutional review by political opposition groups.

Kosovo also amended its legal framework regulating freedoms of association and of peaceful assembly. The Law on Freedom of Association in NGOs was amended to extend the registration process for new CSOs from 30 to 45 days, contrary to international standards to freedom of association. The law also established a complaints commission for NGOs as a first instance body to consider complaints with the mandate to review administrative decisions related to NGO registration, deregistration and status. Moreover, the law required international NGOs operating in Kosovo to register as a local branch. The legal framework regulating freedom of assembly was amended to introduce the distinction between public gatherings and public events, creating obligations for the organisers in the case of the latter in terms of prior notification, contractual arrangements with police, and financial responsibilities for additional security. However, this regulation did not apply to public gatherings, spontaneous or otherwise, creating a gap in the guidance for spontaneous assemblies that may require police presence. The regulation also created an appeals commission on public gatherings responsible for reviewing appeals of police decisions concerning restrictions on, or prohibitions of, public assemblies.

A series of rulings by highest courts offered examples of an independent judiciary actively upholding fundamental freedoms. Regrettably, their implementation by governments was inconsistent. Following the recriminalisation of defamation in Republika Srpska, the Constitutional Court of **Bosnia and Herzegovina** ruled that the provisions were unconstitutional, but authorities in Republika Srpska refused to implement the decision. By August 2024, 122 criminal charges were filed for defamation in the entity, mostly by politicians in Republika Srpska against journalists and the media. In **Türkiye**, a major development was the Constitutional Court's annulment of certain provisions of the Law on the Prevention of Financing of the Proliferation of Weapons of Mass Destruction, and related amendments to the Law on Associations and the Law on the Collection of Aid. These provisions granted excessive discretionary powers to the government such as the authority of the Interior Minister to suspend associations and appoint trustees. No legislative improvements followed, however, and, instead, closure proceedings against CSOs and disruptions to their activities continued, increasing the chilling effect on civil society. While the European Court of Human Rights ruled on 21 cases related to fundamental freedoms, finding 15 violations of freedom of expression and six violations of freedom of assembly, the Turkish Constitutional Court issued 101 related rulings, identifying five violations of freedom of association, 60 of expression, and 26 of peaceful assembly.

In October 2024, in **North Macedonia**, the Judicial Council issued a public reprimand against a judge who had excluded the media and the public from a hearing in a case of significant public interest. Its decision was clear that excluding the public from court hearings constituted a serious violation of transparency and the right to information, both of which were essential for media freedom. Moreover, the Constitutional Court found violations of the rights of journalists to public expression in two cases, overturning previous decisions by the Civil and Appellate Courts that failed to sanction situations in which journalists were prevented from covering events. The Court emphasized that the state must cre-

ate conditions that allowed journalists to report freely. In **Serbia**, the Supreme Court ruled that critical commentary, especially in public debates, should not be restricted by the state, finding in favour of press freedom. The Constitutional Court, however, took a different stance and upheld a fine for defamation against an activist who criticised a public official, finding that the comments exceeded permissible criticism and violated the official's dignity, although a dissenting judge warned of a potential chilling effect on public discourse. The investigative portal KRIK was ordered to pay compensation and cover the costs of proceedings after losing two cases where damage to reputation and honour, and violation of the presumption of innocence were alleged. KRIK filed a constitutional complaint and an appeal to the Supreme Court.

In 2024, in **Albania**, no progress was made on the implementation of the decision by the High Judicial Council to establish an electronic register of non-profit organisations, the deadline for which expired in December 2023. The reasons given were technical challenges and insufficient financial and human resources. Similarly, the 2023 decision of the Constitutional Court that only courts had the competence to register organisations, that registration procedures should be simplified, and that administrative sanctions be eliminated, was also not implemented.

The effective exercise of freedom of peaceful assembly remained a challenge across the region, in particular for environmental and LGBTIQ rights defenders. In **Albania**, in a number of environmental protests, protesters were arrested and criminally charged, although, subsequently, they were generally acquitted by courts. In **Bosnia and Herzegovina**, environmental and labour rights protesters faced misdemeanour fines, intimidation and even violence. Although the Pride parade in Sarajevo was celebrated in June 2024 without incidents, in Banja Luka it had not taken place due to safety concerns by organisers amidst a climate of incitement to violence and discrimination against the LGBTIQ community promoted by high level officials in Republika Srpska. In **Serbia**, key challenges to the freedom of peaceful assembly included a conflicting legal framework, excessive discretionary police powers to ban assemblies, lack of accountability for police misconduct, and judicial harassment of activists. Notably, two public assemblies were banned by authorities: the Mirëdita, Dobar Dan festival bringing together artists, human rights defenders, peace activists and public figures from Kosovo and Serbia with the goal to foster cooperation and peace building, and the Kikinda Short literary festival. Environmental rights defenders were subjected to excessive use of force by the police, arrests and detention, police interrogation, and arbitrary tax audits. As mass protests erupted against a planned lithium mine, dozens of activists were arrested in 17 cities across the country in August 2024. While most detentions were brief, the use of detention by authorities was seen as an intimidation tactic. Mass protests, which followed the collapse of the canopy of a newly renovated railway station in Novi Sad in November 2024, which killed 16 people, were met with increased government repression, police brutality, physical violence against the protesters, intimidation and arbitrary arrests. Pro-government media campaigns sought to delegitimize protests, portraying the activists as 'foreign agents' and fuelling an atmosphere of fear. Statements by high-level politicians further escalated tensions.

Effective realisation of freedom of association continued to face challenges across the region. In **North Macedonia**, the law regulating the use of names of historical figures in the names of associations, whose deficiencies included retroactive application and the non-judicial nature of the commission with the authority to decide on registration of associations, was challenged in court. In 2024, the Administrative Court dismissed the lawsuit filed by the Cultural Centre Ivan Mihailov in Bitola, appealing its removal from the central registry because the name was found to be in contravention of this law. The decision was submitted for review by the Higher Administrative Court. In **Serbia**, both the Constitution and the Law on Associations explicitly prohibited 'secret and paramilitary associations.' However, in a move widely reported by the media, the President appeared to condone a faction within the ruling Serbian Progressive Party which appeared to have established such a secret and paramilitary organisation, giving rise to concern about arbitrary and selective enforcement of the law.

Across the region, challenges persisted with the effective realisation of freedom of expression as well. Defamation remained criminalised in **Albania**, the Republika Srpska entity of **Bosnia and Herzegovina**, and **Türkiye**. In **Bosnia and Herzegovina**, the Law on Freedom of Access to Information, adopted by

the Parliamentary Assembly as one of the priorities for EU accession, saw no progress in its implementation as institutions failed to comply with its requirements: the central portal of public information was not established and neither was the appeals council with the authority to decide on appeals against first-instance decisions. Half of public authorities failed to respond to requests for free access to information within the legal timeframe, often justifying their refusal to provide information with personal data protection. Moreover, most institutions claimed that providing information on service contracts did not serve public interest. In **North Macedonia**, the implementation of safeguards to prevent SLAPPs introduced in law in 2022 stalled, requiring greater emphasis on the provision of training for judges. In **Serbia**, the legislative framework continued to permit forms of state ownership which impeded genuine media independence and pluralism. The work of journalists became increasingly unsafe. Reports showed that authorities employed spyware to monitor the activities of activists and journalists. In 2024, the Independent Association of Journalists recorded a total of 166 attacks on journalists, including 17 physical attacks, six attacks on property, 73 cases of pressure and 70 verbal threats.

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

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

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

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

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

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

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

In 2024, protection of CSOs from interference and attacks remained largely unchanged across the region, with the exception of **Albania** where it declined. The framework protecting the access to an effective remedy for CSOs remained the same, with CSOs allowed to contest or seek a review of decisions impacting their rights under the same laws and procedures as other natural persons and legal entities. In this regard, challenges persisted in the form of excessive length of judicial proceedings which undermined the right to a fair trial, lack of expertise and capacity of CSOs to engage with the system and seek remedies, as well as limited access to pro bono legal services and free legal aid. Nevertheless, this did not prevent a number of CSOs in **Albania** from pursuing a range of lawsuits in courts seeking protection from discrimination or of other constitutional rights. In one such case, the Constitutional Court found that the law approving the construction of a hydropower plant was carried out without public consultation, input from the local community or an assessment of its impact on the environment and related rights, finding the procedure for the adoption of the law in violation of the right to information and environmental protection.

Moreover, the effectiveness of remedies was further restricted by the fact that remedies were generally available only after the adverse effect of a decision or action was suffered without the possibility of prevention. In **Serbia**, for instance, the authority to review official decisions affecting the realisation of the right to freedom of peaceful assembly rested with the Administrative Court, without, however, a specific timeline for deciding on appeals of bans of assemblies and other restrictions, rendering the remedy moot.

With regard to amendments of the legal framework, a draft revision to the Criminal Code in **Serbia** originally contained provisions introducing a new criminal offence of 'publishing materials advising the commission of a criminal offence.' Following a public outcry because of their negative impact on freedom of expression, these amendments were excluded from the adopted law. In **Albania**, no progress was made on the adoption of the Law on Class Action, the discussion of which before a Parliamentary Commission had been pending for three years. In **Kosovo**, the Law on Freedom of Association was amended to establish an Appeals Commission as the administrative body responsible for the review of final decisions made by public authorities under the NGO law.

In **Türkiye**, the legal framework lacked sanctions in cases where the rights of associations and foundations were violated, leaving CSOs without access to an effective remedy. In what should have been a positive development, the Constitutional Court annulled the requirement for CSOs to have the public benefit status to be able to access legal aid, finding the requirement unconstitutional as it unduly restricted the access to justice. The decision allowed all CSOs to apply for legal aid under specific conditions. However, while the decision was expected to take effect in August 2025, the parliament had not yet introduced new legislation creating the risk that even CSOs that were eligible for legal aid under the previous legislation may lose access as a result.

In 2024, the ability of CSOs to challenge or seek review of decisions affecting the exercise of their rights remained similar to previous years: 17% of CSO respondents stated that government authorities took decisions on their organisation which negatively impacted its ability to exercise its rights.

Proportion of CSOs against whom government authorities took decisions which negatively impacted their ability to exercise rights

2024	17%
2023	17%
2021	20%

Fewer than one-fifth of them, 18%, indicated that they were able to effectively challenge such decisions through official, legal, judicial and administrative channels. However, more than three-fifths, 61%, stated that they were not able to challenge effectively such decisions; they accounted for 10% of CSOs participating in the survey.

Proportion of CSOs unable to challenge or seek review of decisions affecting the exercise of their rights

2024	10%
2023	9%
2021	12%

Respondents cited the following as reasons for not being able to challenge such decisions: lack of trust in the system and its impartiality; fear of repercussions in case of publicity; lack of effective mechanisms to challenge decisions; lack of possibility to appeal; lack of organisational capacity; high risks in a restrictive political climate; and exhaustion of legal remedies.

The highest proportion of CSOs reporting that government took decisions which negatively impacted their ability to exercise their rights in 2024 was reported in **Montenegro** and **Serbia**, 21%, and the lowest in **Albania**, 5%. Similarly, the proportion of CSOs that were unable to challenge such decisions was highest in **Montenegro** at 16%, and lowest in **Albania**, 3%.

With regard to legal protection of CSOs from threats, attacks and judicial harassment, such protection continued to be derived from general legal provisions which protected natural persons and legal entities. Much of the legislation remained unchanged, including with regard to the criminalisation of defamation which was in place in **Albania**, the Republika Srpska entity of **Bosnia and Herzegovina**, and **Türkiye**. No specific protections for CSOs were in place, with the exception of **Kosovo**, where the Criminal Code discriminated against domestic CSOs in favour of international CSOs that exclusively benefitted from certain specific protections.

The overall environment, however, became increasingly hostile for human rights defenders and journalists across the region, in particular women journalists and human rights defenders, environmental activists and LGBTIQ rights defenders. In **Albania**, incidents involving journalists included intimidation, threats, harassment, assault and bullying. The Prime Minister went as far as physically assaulting a female journalist. Given the increase in SLAPPs, **Albania** committed to adopting anti-SLAPP protections into domestic legislation by 2027. In **Bosnia and Herzegovina's** Republika Srpska, high ranking officials reportedly incited violence and hatred against LGBTIQ activists, and perpetrated verbal attacks against journalists, including women journalists. In a more positive development, 32 contact points for journalist safety were appointed within prosecutors' offices across the country. In **North Macedonia**, the rise of the anti-gender movement was accompanied by an increase in smear campaigns against gender equality and LGBTIQ activists, as well as a surge in online threats and hate speech. While the police showed a degree of willingness to identify perpetrators of online harassment, prosecution and court proceedings remained slow. Although the law provides safeguards against SLAPPs, its implementation has so far been inconsistent. A landmark verdict in 2024 saw the first conviction for hate speech based on sexual orientation, establishing a legal precedent in the fight against discrimination and online incitement to violence. Nevertheless, state intimidation and pressure on journalists remained of concern as a

high-profile woman journalist was allegedly illegally surveilled by the Higher Public Prosecutor's Office. In **Serbia**, authorities failed to protect CSOs from attacks and interference, fostering a hostile environment of smear campaigns and surveillance. High-ranking officials labelled CSOs as foreign agents, state security agencies used spyware to monitor them while authorities leaked activists' personal data and ignored violent attacks on activists, including physical assaults and threats from pro-government media. In **Türkiye**, the law failed to protect CSOs adequately amidst an increasingly hostile environment.

Across the region, at 78%, the proportion of CSOs reporting that they were able to operate effectively without threats, attacks and judicial harassment, remained stable compared to previous years.

Proportion of CSOs that operated effectively without threats, attacks and judicial harassment	
2024	78%
2023	74%
2021	76%

At the same time, 16% of participating CSOs indicated that they or their members were subjected to threats, physical attacks, unlawful searches or inspections or experienced property damage or interference with communications in 2024.

Proportion of CSOs that reported being subjected to threats, attacks and judicial harassment	
2024	16%
2023	18%
2021	16%

The highest rate of threats, attacks and judicial harassment was reported by CSOs in **Serbia**, 22%, while the lowest rate was reported in **Albania** and **North Macedonia**, 13%, respectively. The highest increase in comparison with 2023, was reported in **Kosovo**, up 8%, while the highest decrease, down 12%, was reported in **Bosnia and Herzegovina**. By contrast, 70% of public officials who took part in the survey of public authorities were of the view that CSOs were able to operate effectively without threats, attacks and judicial harassment.

Threats or physical attacks were most prevalent in **Serbia** where 19% of participating CSOs reported that they, their members or both were subjected to them. Examples included smear campaigns in the media and on social media, being labelled as a traitor and foreign agent, harassment in places of work, covert and open threats, among others.

Property damage was most prevalent also in **Serbia** where 7% of CSOs reported having experienced it. Examples included damage to phones infected with spyware, arson attacks, break-ins and theft of office equipment, damage to vehicles and animal shelters with killings of animals, among others.

Unlawful searches and inspections were most prevalent in **Türkiye** where 4% of CSOs reported being subjected to them. Examples included CSOs subjected to investigations due to advocacy on LGBTIQ rights - despite no legal grounds for the investigation, and frequent inspections, particularly targeting foreign-funded CSOs, among others.

Interference with communications by authorities was most prevalent in **Serbia** where 7% of CSOs reported having experienced it. Examples included instances of illegal surveillance software installed on mobile phones, among others.

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

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

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

- being judicially harassed for their alleged connections with extremism, terrorism, money laundering and corruption;
- discriminatory restrictions placed on funding,
- authorities or banks preventing them from opening bank accounts, sending or receiving money

The year 2024 saw a flurry of legislative activity across the region as laws on anti-money laundering and countering terrorism financing were adopted in **Bosnia and Herzegovina**, **North Macedonia** and **Serbia** with the aim of complying with the EU accession requirements. In **Kosovo**, the law remained in draft form pending adoption in 2025. While the laws were intended to align with international standards, concerns nevertheless arose about potential risks that disproportionate obligations may be imposed on CSOs. This is because CSOs were formally designated as reporting entities which required them to conduct risk assessments, establish internal controls and fulfil reporting duties without a completed sectoral risk assessment.

In **North Macedonia**, the issue of high fees for delays in the registration of a beneficial owner remained a concern in 2024.

In **Albania**, the government adopted the 2024–2030 Intersectoral Anti-Corruption Strategy, in collaboration with civil society. Moreover, the Financial Intelligence Agency published guidelines for non-profit organisations on the financing of terrorism, drafted in collaboration with the civic and private sectors. The guidelines aimed to familiarise CSOs with the concept of terrorist financing, relevant Albanian legislation and their obligations in the context of combating terrorism financing. Moreover, in December 2024, it approved the National Strategy for the Prevention of Money Laundering and Terrorism Financing with Action Plan 2024–2030.

Across the region, the proportion of CSOs whose ability to undertake legitimate activities was not restricted by the implementation of laws to combat extremism, terrorism, money laundering and corruption, at 87%, remained in line with those in previous years.

Proportion of CSOs whose ability to undertake legitimate activities was not restricted	
2024	87%
2023	86%
2021	85%

The proportion of participating CSOs that reported that, in 2024, their organisation, members, or both were subjected to judicial harassment, had discriminatory restrictions placed on funding or were prevented from opening bank accounts, sending or receiving money, amounted to 7%.

Proportion of CSOs reporting some form of restriction of their ability to undertake legitimate activities	
2024	7%
2023	8%
2021	10%

At 9%, this proportion was highest in **Kosovo, Serbia and Türkiye**, and lowest in **Bosnia and Herzegovina** at 3% of respondents. The only increase was noted in **Serbia**, 3%, while the highest drop was reported in **Bosnia and Herzegovina**, 6%. As reported by participating CSOs, restrictions were equally distributed among judicial harassment, funding restrictions and banking obstacles, with 2%, 3% and 3% of respondents reporting that they or their members were subjected to such treatment. The highest proportion of CSOs subjected to judicial harassment was reported in **Türkiye**, 5%. The highest level of CSOs experiencing discriminatory restrictions based on funding was reported in **Serbia**, 6%. The highest level of CSOs experiencing obstacles with opening bank accounts or sending and receiving money was reported in **Kosovo**, 5%.

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

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

In 2024, the legal framework regulating the reporting and inspection requirements remained generally unchanged and in line with standards, treating CSOs and businesses equally with regard to reporting requirements, inspections and sanctions. In **Serbia**, a database of legal entities was established by the Tax Administration which may necessitate CSOs to submit the personal data of their staff, volunteers and consultants. Moreover, revised tax regulations imposed stricter fines for late or missed tax returns. While these amendments increased the reporting requirements and financial risks for CSOs, they did not result in unequal treatment of CSOs when compared to businesses.

In **Türkiye**, CSOs continued to face disproportionate reporting requirements in particular with regard to foreign funding. The requirement to notify authorities of their intention to send funding abroad or receive foreign funding remained, subjecting CSOs to excessive reporting obligations and treating them differently to businesses.

Significant deterioration was observed in **Bosnia and Herzegovina**, following the initial withdrawal in

July 2024 and the subsequent adoption in February 2025, in Republika Srpska, of the Law on the Special Register and Public Transparency of the Work of Nonprofit Organisations. The law requires CSOs to submit special reports and includes overly broad definitions and inspection provisions that lack adequate safeguards against official abuse. By March 2025 its status was being contested before the Constitutional Court.

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

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

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

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

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

The legal framework regulating the ability of community and local organisations, and civic initiatives to operate without registration did not change in 2024. Such organisations continued to be able to operate without hindrance across the region, although, with regard to the ability to access funding, small community and local organisations and civic initiatives were able to do so only in **Albania**. The exception here was **Türkiye** where, despite not being explicitly prohibited, such organisations were unable to fully exercise their freedom of association without registering, as the legal framework for CSOs only recognized specific forms of registered entities.

As in previous years, community and local organisations and civic initiatives continued to enjoy the right to participation generally in line with that of registered CSOs. Online platforms for consultation allowed for participation of such groups as well, although their effectiveness was limited overall by low usage rates. Nevertheless, their ability to exert formal influence remained limited in places as they lacked a recognized legal status. In **Serbia**, the requirement that CSOs be registered for a certain period of time to be eligible for participation in some working groups gave rise to concern where such periods were excessive, as, for instance, in the case of the Ministry of Environmental Protection where the call for nominations for the Working Group on the Draft Law of Air Protection required candidates to have been established for eight years.

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	5	3	5	5	5	5	2
2023	5	3	5	5	5 ¹³	5	2
2021	5	4	5	5	5 ¹⁴	5	2

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

In 2024, again, the legal framework enabling CSOs to raise funds from a variety of sources without restrictions remained generally strong. In **Albania, Kosovo, Montenegro** and **North Macedonia**, CSOs were able to receive funding from a wide variety of sources. The exceptions were **Türkiye**, where the restrictive environment remained in place, **Bosnia and Herzegovina**, due to the continued risk of significant deterioration of the legal framework in Republika Srpska, and, potentially, **Serbia**, for the same reason.

Developments in **Bosnia and Herzegovina's** Republika Srpska were of particular concern: although the adoption of the Law on the Special Registry and Publicity of the Work of Non-Profit Organisations was halted when the draft was withdrawn in July 2024, the law was nevertheless adopted in February 2025. Other relevant laws at the level of the state, the Federation and Brčko District remained unchanged. In the course of the year, no progress was made on the adoption of the Law on the Financing of Civil Society in the Federation of Bosnia and Herzegovina. In November 2024, in **Serbia**, a draft law proposing the establishment of a registry for 'agents of foreign influence' was submitted to the parliament by the Movement of Socialists, raising significant public concern. No progress was made on the adoption of this law, and the legislative framework continued to allow CSOs to access a broad range of sources of funding. In **Türkiye**, the legislative framework continued to restrict CSOs in accessing a broad range of funding, including from abroad. Prior authorisation for CSOs without the public benefit status and presidential permission remained mandatory for the collection of 'aid.' At the same time, the award of public benefit status and permission of collection of aid without prior authorisation continued to lack transparent criteria and remained subject to discretionary presidential approval. Moreover, CSOs with foreign funding were still required to comply with mandatory notification. Under the circumstances, it was a positive development that the Constitutional Court annulled the provision in the Law on the Collection of Aid which restricted the extension of 'aid' collection permits to one year because it was deemed to violate the principle of the rule of law. The government did not implement the decision by the end of 2024.

As in the previous years, CSOs participating in the survey confirmed that they were generally free to raise funds without restrictions: 91% of respondents indicated that they were able to access any type of funding without undue government interference.

¹³ The assessment for 2023 was changed to reflect a more rigorous application of indicator criteria.

¹⁴ The assessment for 2021 was changed to reflect a more rigorous application of indicator criteria.

Proportion of CSOs indicating that they could access a broad range of funding without undue government interference	
2024	91%
2023	91%
2021	84%

At 3%, the proportion of participating CSOs reporting that they experienced some form of undue government interference, such as having their account frozen or being subjected to arbitrary audits, remained low.

Proportion of CSOs indicating that they experienced some form of undue government interference when accessing any type of funding	
2024	3%
2023	4%
2021	3%

Their proportion was highest in **Türkiye**, 5%, and lowest in **Bosnia and Herzegovina** and **North Macedonia** where no participating CSOs reported any such interference.

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

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

Indicator 1.7.b: Percentage of public budget actually disbursed to CSOs in a year¹⁵

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

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

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

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

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	1	2	2	1	1	1	1
2023	1	1	2	1	1	1	1
2021	2	1	1	1	1	1	1

¹⁵ This indicator is not reviewed for 2023 as consistent and reliable data was not available.

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

The provision of public funding to CSOs in 2024 continued to suffer from insufficient transparency and accountability across the region, although minor improvements were noted in **Albania** and **Serbia** with regard to information on funding awards made publicly available. The CSO perception of transparency and fairness in the provision of public funding, nevertheless, remained markedly negative.

Montenegro remained the only country in the region where the level of public funding was set in law, namely the Law on Non-Governmental Organisations, which required the government to allocate at least 0.5% of the annual budget to CSO funding. In **Kosovo**, the regulatory framework required central and local institutions to plan CSO funding through clear budget lines during the annual budget process. While not set in law, the level of funding for CSOs was set subject to government priorities and available resources. In **North Macedonia**, the level of CSO funding was not set in law, but the Action Plan of the Strategy for Cooperation with Civil Society 2022–2024 stipulated that state funding should cover 30% of total CSO turnover in 2024; this level of funding was not achieved as it was not included in the state budget. In **Serbia**, the annual Law on Budget allocated specific amounts to various government bodies and programmes for disbursement to CSOs, but the level of funding was not determined by law.

With regard to laws that regulated the award of public funding to CSOs, and the transparency and impartiality of the procedure, the record remained mixed and unchanged in 2024. In **Albania**, the Agency for the Support of Civil Society retained the good practice of organising consultations with CSOs to determine priority areas for upcoming calls for proposals. Public institutions provided financial support to CSOs through open calls or restricted calls for specific categories of CSOs based on rules and procedures determining the scope of funding, application criteria, selection and award criteria. However, there was no unified and inclusive regulatory framework which would require all public bodies to follow the same standards, criteria and procedures in place in 2024. A unified procedure for the award of public funding was also not in place in **Bosnia and Herzegovina**, similarly to previous years. In a step forward, the Ministry of Finance of the Federation of Bosnia and Herzegovina issued guidelines on minimum standards for allocation of budgetary funds through transfers and subsidies in the Federation of BiH in May 2024. The guidelines established minimum standards for the allocation of budgetary funds including with regard to budgeting, selection, contracting, monitoring of the implementation and evaluation of the results, public disclosure and reporting. In **Kosovo**, the regulatory framework provided a comprehensive outline of funding criteria and evaluation procedures. Nevertheless, shortcomings included varying levels of transparency across institutions in spite of the legal requirement to publish the funding criteria, and the lack of oversight mechanisms to ensure consistent and fair assessment of proposals across sectors and municipalities. In **North Macedonia**, the legal framework failed to regulate the criteria for allocation of funding, the procedure for the award, the composition of evaluation commissions, as well as mechanisms for monitoring and oversight, leaving room for inconsistencies in the distribution of funding and reducing the transparency of the process. In **Serbia**, significant deficiencies persisted in the legal framework, including the lack of a mechanism to evaluate project outcomes, lack of oversight of narrative and financial reports, inconsistent decisions on the allocation of funding, insufficient transparency in the work of funding award committees, and inadequate appeals processes. Throughout 2024, a number of ministries awarded funding in contravention of standards and procedure. The Ministry of Family Care and Demography and the Ministry of Education awarded funds to organisations that did not meet the formal eligibility requirements of the call. The Minister without Portfolio launched a call for gender equality projects in which the timeline for the implementation of activities following the award of funding amounted to 12 days. Other issues giving rise to significant concern included changing submission deadlines after the call had been launched, changing the amounts of funding available without explanation, and awarding funding to organisations with no online presence or recent activity. An analysis of funding allocated through calls launched by the Ministry for Family Care and Demography and the Provincial Secretariat for Social Policy, Demography, and Gender Equality in 2023 and 2024 showed that over 80% of funding was allocated to fictitious organisations that, in practice, lacked genuine operations, structure, or presence. In **Türkiye**, the award of public funding continued to present significant gaps with regard to transparency, fairness and accountability. Ministries retained

full discretion in awarding funding and rarely published guidelines with eligibility and evaluation criteria. In 2024, it was only the Ministry of Interior, the Directorate General for Civil Society Relations and the Ministry of Youth and Sport that published project application guidelines within a specific call for the Disaster-affected Youth Empowerment Support Programme. While the guidelines included overall eligibility and evaluation criteria, the total amount of support to be allocated to CSOs was not published.

In practice, making the information on awards publicly available and sufficiently detailed to identify individual awards remained a challenge in 2024 across the region, in spite of some progress noted in **Albania** and **Serbia**, and with the exception of **Kosovo** where the government continued to maintain an official online platform where it published data on grants awarded to CSOs, even if it was updated only once per year. In **Albania**, some progress was noted as most public institutions started publishing lists of awards on their websites. The lists included information such as the name of recipient CSO, the size of the grant and project title. Similarly, in **Serbia**, the availability of data on awards improved with the introduction of the Calendar of Calls by the Ministry of Human and Minority Rights and Social Dialogue. The calendar provided information on upcoming and implemented calls for civil society funding, although the consistency and quality of information varied across institutions. On the other hand, in **Bosnia and Herzegovina**, no central data monitoring systems were in place enabling the scrutiny of the allocation, distribution and implementation of projects. While, in **North Macedonia**, most awards were published on institutional websites, they often lacked sufficient details about the evaluation processes, methodologies and rankings, and the information that was provided was inaccessible and unsearchable. In **Türkiye**, the practice continued to contradict the legal framework: although public institutions were obliged to publish lists of recipient organisations, amounts received and the purpose of the grant, implementation remained inconsistent whereby some institutions published aggregate figures and others nothing at all. Nevertheless, more than three-quarters of public officials who responded to the survey of public authorities were of the view that the provision of public funding for which their institution was responsible was fair and transparent.

This view was diametrically opposite to the perception of CSOs: only 14% of respondents to the CSO survey stated the provision of public funding was transparent and fair.

Figure 1: Proportion of CSOs indicating that the provision of national public funds is sufficiently or very transparent and fair



The level of confidence was highest in **Bosnia and Herzegovina** at 23%, and lowest in **Serbia** at 5%. Compared to 2023, the highest increase in the level of confidence was reported in **Bosnia and Herzegovina**, 9%, while the highest drop was reported in **Kosovo**, 13%.

When asked how inclusive¹⁶ the award to CSOs of public funding for which their institution was responsible was, three-quarters, 76%, of respondents to the survey of public authorities stated that the process was sufficiently or very inclusive in 2024. The CSO perspective was different: 41% of the 50% of CSO respondents that did not apply for public funding in 2024, stated that they did not apply because they did not think they had a realistic chance of winning.

Sector	Proportion of CSOs that did not apply for public funding, by sector, in 2024 n = no. of CSOs that did not apply for public funding	Proportion of CSOs working in each sector that did not apply for public funding, in 2024 n = no. of CSOs from the respective sectors
Human rights	23%	52%
Social inclusion	15%	43%
Minority rights and non-discrimination	8%	52%
Gender equality and LGBTIQ rights	13%	51%
Rights of people with disabilities	9%	44%
Children's rights	8%	58%

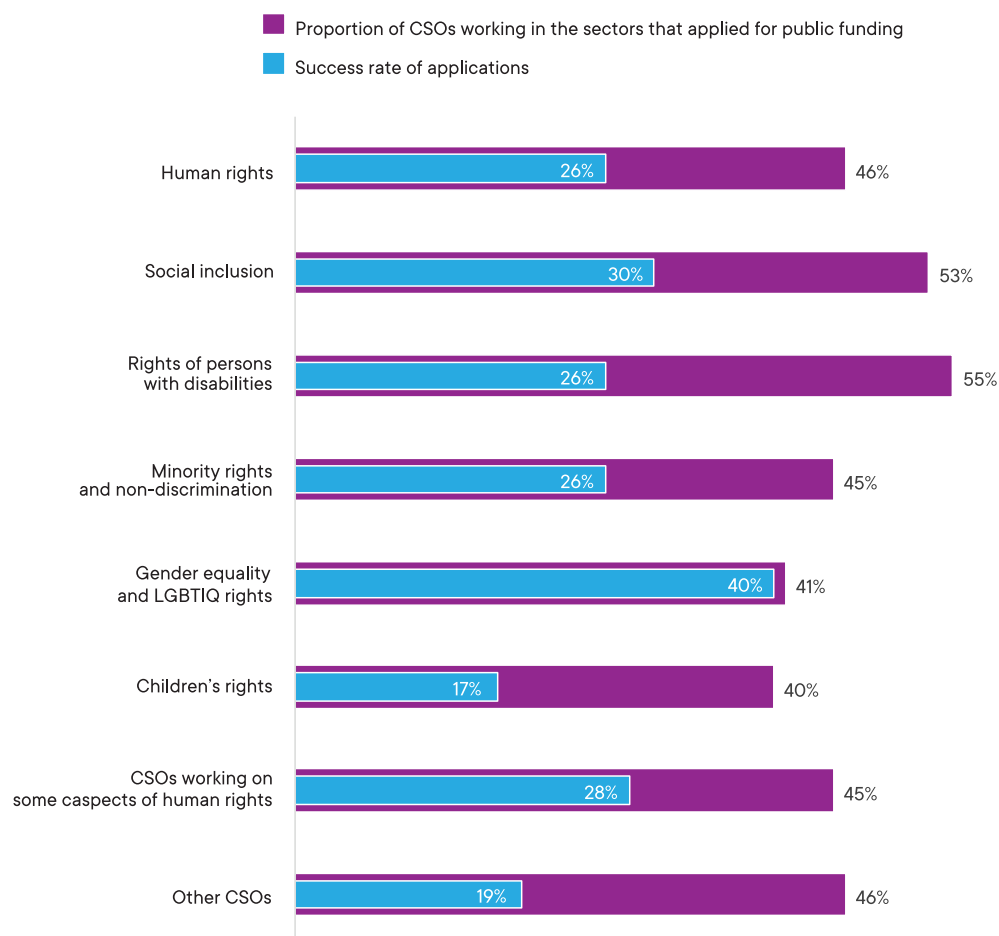
In 2024, just under one-half, 46% of participating CSOs applied for public funding.

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

Of CSOs that applied for public funding, 70% had unsuccessful applications. When asked why they thought their application was unsuccessful, 55% of unsuccessful applicants stated that authorities funded their preferred organisations; 13% were of the view that authorities did not want to fund the work of the people they served and represented. As in previous years, it did not appear that CSOs working on various aspects of human rights were at a particular disadvantage: 66% of such CSOs had unsuccessful applications; this proportion was 74% for CSOs that did not work on human rights. The least unsuccessful were CSOs working on gender equality rights: 60% of such organisations had unsuccessful applications. The least successful were CSOs working on children's rights: 77% of such CSOs had unsuccessful applications.

¹⁶ Inclusive meant that a broad range of CSOs working on a vast variety of issues and representing many different communities or groups was awarded funding.

Figure 2. Proportion of CSOs working on various aspects of human rights that applied for public funding and their respective success rate, in 2024



The rate of success matched the perception of disadvantage. Unlike in 2023, when the perception of disadvantage was stronger among CSOs working on some aspect of human rights, in 2024, this perception was more equally shared: of those that applied and had unsuccessful applications, 13% stated that their applications were unsuccessful because the authorities did not want to fund the work with people they served and represented. This proportion was 13% for CSOs working on some aspect of human rights and 14% for CSOs not working on human rights. Moreover, of the respondents who stated that their application was unsuccessful because the authorities did not want to fund the work with people they served and represented, 44% worked on some aspect of human rights, and 56% worked in other sectors.

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

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

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

The availability of tax benefits for individuals and corporations that made donations to CSOs remained unchanged in 2024, maintaining a fiscal environment which did not encourage donations to civil society. In **Albania**, laws did not recognise individual donations as tax deductible, while tax incentives for corporate donations remained marginal. In **Bosnia and Herzegovina**, individual donations could be tax-deductible, but the percentages varied across entities. In **Kosovo**, the Law on Personal Income Tax was amended to increase the non-taxable income threshold to EUR 3,000. Given that individuals earning below this threshold no longer have taxable income from which to deduct donations, the new framework may limit the incentive for lower-income individuals to donate. In **North Macedonia**, an amendment to the Law on Corporations and Sponsorships was consulted with civil society, but, although it was published on the online consultation platform in January 2024, it was not adopted by the end of the year. The amendments were intended to simplify the donation process, reduce administrative burdens and promote long-term financial support for civil society initiatives. In **Serbia**, individual donors continued not to enjoy any tax benefits while the administrative procedure for corporate donors remained excessively burdensome. In **Türkiye**, limited tax exemptions were possible only for donations made to associations and foundations with public benefit or tax exemption status, both enjoyed by an insignificant proportion of CSOs.

Across the region, the proportion of private individuals who gave money to a CSO in 2024 increased everywhere with the exception of **Montenegro** where it dropped by 5% compared to 2023. The highest share of individual donors was reported in **Kosovo**, 58%, immediately followed by **Bosnia and Herzegovina** with 57%. At 22%, the lowest share of private individual donors was reported in **Türkiye**.

Proportion of private individuals who have given money to a CSO			
	2024	2023	2021
Albania	39%	25%	31%
Kosovo	58%	51%	59%
Bosnia and Herzegovina	57%	51%	45%
Montenegro	28%	33%	39%
Serbia	43%	41%	47%
North Macedonia	45%	39%	45%
Türkiye	22%	18%	25%

Source: Charities Aid Foundation, World Giving Index, <https://www.cafonline.org/about-us/research/caf-world-giving-index>

SO 1.9. Tax benefits are available to CSOs

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

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	3	3	3	3	3	3	3
2023	3	3	3	3	3	3	3
2021	3	3	3	3	3	3	3

In 2023, tax regimes affecting taxation of CSO incomes remained unchanged across the region creating a somewhat favourable environment. CSOs continued to be generally exempt from taxes on income such as donations, grants, and membership fees, provided that the funds were used for public benefit. With regard to income generated from economic activity, however, such income continued to be subject to profit taxes across the region, although **Kosovo, Montenegro, North Macedonia** and **Serbia** imposed low thresholds of income which were exempt from taxation.

In **Albania**, the Law on Income Tax entered into force in 2024, introducing a 0% VAT rate for goods and services used in projects funded by foreign donors or grants, replacing the previous procedure of VAT reimbursement at the end of project implementation. In **North Macedonia**, a notable drawback was the lack of adoption of the Law on Social Enterprises which was expected in 2024 but was delayed due to an apparent lack of political will.

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

Indicator 1.10.a: Laws regulating volunteering are adopted

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

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

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

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

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

Indicator 1.10.e: Proportion of employees in CSOs in relation to the total workforce¹⁷

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

The policy and legal environment for volunteering and employment in the civic sector in the region remained unchanged in 2024 as it failed to provide incentives for, or facilitate, volunteering and employment in CSOs. Existing legal frameworks were largely deficient and while some progress was made on the development of new laws, none were adopted. Laws on volunteering were in place in all countries with the exception of **Kosovo** where a government policy was under development in 2024 but not adopted, and **Türkiye** where a draft law had been pending for adoption since 2022. In **Albania**, consultations were held on new draft legislation, but the law was not adopted by the end of the year. In **Bosnia and Herzegovina**, laws on volunteering were in place at the entity and district level, but not at the state level. In **North Macedonia**, amendments to the law on volunteering drafted in 2021 were not adopted by the end of 2024. Similarly, in **Serbia**, a working group established in 2023 to prepare the draft of a new law did not meet in 2024.

No strategies to support volunteering for CSOs were in place in 2024, with the exception of **North Macedonia** where the National Strategy for the Promotion and Development of Volunteering 2021–2025 was in place, but its Action Plan lacked adequate resources. In **Bosnia and Herzegovina**, the Strategy for the Improvement and Development of Volunteering which was in place in Republika Srpska ended in 2023 and was not replaced with a new strategy. **Kosovo** also did not have a volunteering strategy in 2024, however the Strategy for Youth contained references to volunteering.

The proportion of CSOs that benefitted from state employment strategies and programmes declined steadily since 2021 with 9% of participating CSOs across the region reporting that they benefitted in 2024.

Proportion of CSOs that benefitted from government employment programmes	
2024	9%
2023	12%
2021	16%

¹⁷ This indicator is not reviewed for 2023 as consistent and reliable data was not available.

The highest proportion of CSOs reporting that they benefited from state employment programmes was in **Montenegro**, 21%, and the lowest in **North Macedonia** and **Türkiye**, at 3% each. While any increases in CSOs benefitting from such programmes were marginal, a decrease of 8% was noted in **North Macedonia**. Benefits included state subsidies for the employment of young people without work experience, persons with disabilities, or the long-term unemployed.

The proportion of CSOs that benefitted from state volunteering strategies and programmes remained negligible overall, with only 4% of CSOs reporting that they have benefitted from such programmes in 2024, a level identical to previous years. With regard to the proportion of people who volunteered their time to an organisation, the proportions remained fairly uniform across the region, and across the years.

Percentage of people who have volunteered their time to an organisation			
	2024	2023	2021
Albania	11%	8%	11%
Bosnia and Herzegovina	12%	9%	7%
Kosovo	8%	8%	10%
Montenegro	9%	9%	11%
North Macedonia	9%	9%	11%
Serbia	7%	6%	5%
Türkiye	10%	9%	10%

Source: Charities Aid Foundation, World Giving Index, <https://www.cafonline.org/about-us/research/caf-world-giving-index>



Specific Objective 2

Strengthened cooperation and partnership between CSOs and public institutions

In 2024, cooperation and partnership between CSOs and public institutions continued to face challenges, failing to measure up to standards in several respects, including with regard to CSO participation in decision-making, public authorities' acknowledgment of the importance of civil society in policy debate, and the effectiveness of strategic policy frameworks and institutional mechanisms for civil society strengthening.

Across the region, no progress was noted with regard to effective participation of CSOs in public decision- and policy-making. While legal frameworks regulating public participation remained in place, deficiencies persisted with regard to their implementation. This was evident also in the context of civil society participation in the EU accession process. A major milestone was achieved when the EU approved the Reform Agendas of **Albania, Kosovo, Montenegro, North Macedonia** and **Serbia** in October 2024. However, at the domestic level, these agendas were adopted often in urgent procedures and without meaningful involvement of civil society. Where good practices were noted, they tended to be the outcome of donor-funded projects to develop strategies, policies or regulations rather than a reflection of institutional commitment to meaningful and effective participation of civil society from the earliest stages of the process.

While online platforms for public consultation in lawmaking remained in place across the region, with the exception of **Montenegro** and **Türkiye**, their impact was limited due to low rates of public involvement, infrequent updates, insufficient information available on them, including limited publication of draft laws. Over-reliance on emergency procedures for the adoption of laws remained a concern in 2024 as well, with proportions of laws adopted without a public consultation process as high as 78% in **North Macedonia**, and 66% in **Albania**.

It is, therefore, not surprising that, across the region, the proportion of respondents participating in the CSO survey who reported that they were effectively consulted in the drafting of laws, bylaws, strategies, other acts of public interest and policy reforms in 2024, declined to under one-fifth, and, at 19%, was the lowest value to date. As in previous years, where CSOs were of the view that they were effectively consulted, they tended to be larger organisations: of those that stated they were effectively consulted, 44% had an annual turnover of more than EUR 100,000, while 24% of CSOs with an annual turnover under EUR 25,000 or no turnover stated the same. In fact, the gap between small and large organisations stating that they were effectively consulted grew over time as the proportion of organisations that were of the view that they were effectively consulted increased among those whose annual turnover exceeded EUR 100,000 and declined among those whose annual turnover was below EUR 25,000. This gap grew from 16% in 2021 to 27% in 2024.

Across the region, the CSO perception of the attitude of public officials towards civil society remained largely negative, in line with previous years. In 2024, just over one-fifth, 21%, of participating CSOs reported that, in their view, the attitude of public officials towards civil society was supportive. This perception declined everywhere, with the exception of **Albania** and **Serbia**. **Albania** bucked the trend as the proportion of CSOs assessing the attitude of public officials as supportive was the highest, increasing to 41%, up from 38% in 2023. In **Serbia**, the perception also grew, however, from the lowest value of 6% in 2023 to 11% in 2024, still the lowest proportion in the region.

The record was mixed across the region with regard to civil society cooperation strategies in force. Such strategies were in place in **Montenegro, North Macedonia** and **Serbia**. In **Albania** and **Kosovo**, they ended in 2023 without the timely development and adoption of a new strategy, although in **Kosovo** consultations on the development of a new strategy were ongoing in 2024. Such consultation was also

initiated in **North Macedonia** as the strategy ended in 2024. It is noteworthy that **Bosnia and Herzegovina** saw the beginning of the consultation process to develop the first ever civil society cooperation strategy at the state level. Nevertheless, civil society cooperation with governments was hindered also by the lack of budgeted action plans in countries where strategies were in place. In **North Macedonia**, the Action Plan for 2022–2024 had no funds, while in **Serbia** the Action Plan 2024–2025 was only adopted at the end of 2024. Moreover, public structures responsible for the implementation of civil society cooperation strategies continued to face challenges similar to previous years, including insufficient human and financial resources, and overreliance on foreign assistance. Previous shifts in mandates and responsibilities, which resulted in decreased political leverage, continued to hinder the effectiveness of some offices for cooperation.

Meaningful inclusion of CSOs in civil society cooperation councils deteriorated in 2024, in comparison with the previous year, with the exception of **Bosnia and Herzegovina** and **North Macedonia** where the situation did not change. The feeling among the members of the Advisory Body of the Council of Ministers of **Bosnia and Herzegovina** for Cooperation with Non-Governmental Organisations was that the body served for window-dressing purposes to tick off EU requirements as the Council of Ministers continued not to engage with it. In **North Macedonia**, the Government Council for Cooperation with the Civil Society Sector remained inactive throughout 2024 due to the continued boycott by civil society representatives. Elsewhere, in **Albania**, the National Council for Cooperation with Civil Society did not have an annual workplan in 2024, unlike in the previous year. In **Kosovo**, the Council for Government Cooperation with Civil Society was not operational, as new members were not appointed following the expiration of its mandate in December 2023. In **Serbia**, the Council for the Creation of an Enabling Environment for the Development of Civil Society saw its effectiveness undermined by systemic barriers and the overall hostile environment for civil society as the highest-level political figures continued to defame and stigmatise CSOs.

A more detailed overview of research results by each specific objective is presented below while the assessment of the respective indicators and related analysis for each IPA beneficiary is included in the Annexes 1–7.

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

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

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

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

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

Indicator 2.1.c: Proportion of CSOs that have participated in consultations during preparation of state reports under international human rights and other legal obligations and the implementation of treaty body recommendations¹⁹

In 2024, no progress was noted with regard to effective participation of CSOs in public decision- and policy-making. Across the region, legal frameworks regulated public participation in law- and policy-making but deficiencies remained in their implementation. In **Albania, Montenegro** and **North Macedonia**, the matter was regulated by laws, while in **Bosnia and Herzegovina, Kosovo** and **Türkiye** regulations and bylaws mandated the public consultation process with different degrees of compliance with international standards. Where good practices were noted, they tended to be the outcome of donor-funded projects to develop strategies, policies or regulations rather than a reflection of institutional commitment to meaningful and effective participation of civil society from the earliest stages of the process.

In **Albania**, the Law on Public Notification and Consultation required that draft laws and strategies be publicly consulted, that the minimum duration of public consultation be 20 days, and that ministries report on the outcomes of public consultation. In **Montenegro**, the Law on Public Administration regulated public participation in decision-making processes. In **North Macedonia**, the Law on the Organisation and Work of State Administration Bodies outlined clear requirements for state authorities to conduct public consultations when drafting laws and regulations. In **Bosnia and Herzegovina** public consultation was regulated by several regulations at the different levels of governance; however, they

¹⁸ This indicator is not reviewed for 2023 due to the vagueness of the indicator which made it difficult to collect consistent and reliable data.

¹⁹ This indicator is not reviewed for 2023 due to challenges with data collection which led to unreliable data.

exhibited deficiencies concerning notification requirements, reporting of consultation outcomes and publication of reports. In **Kosovo**, a new Regulation on the Rules of Procedure of the Government replaced the previous regulation in 2024 with mixed results. While the new regulation provided a clearer definition and procedural basis for the use of emergency adoption procedures, limiting them to emergency situations and exceptional circumstances, it also shortened the minimum consultation time to up to 30 days from up to 60 days previously.

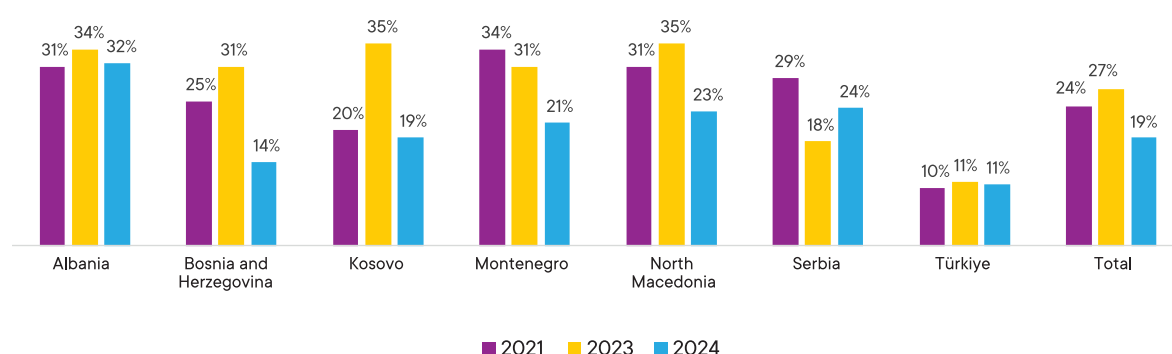
Moreover, across the region, in general, the legal framework did not contain formal provisions regulating civil society participation in working groups. There was no requirement for public calls based on clear and transparent criteria, or specific inclusion of diverse groups such as ethnic minorities, LGBTIQ groups, and persons with disabilities, among others. In **Kosovo**, while internal procedures in some ministries and agencies required such an approach, the practice was not uniform across government. In **Serbia**, such practice was also not required, and appointments were often marred by political considerations and the lack of transparency.

In 2024, online platforms for public consultation in lawmaking were in place across the region with the exception of **Montenegro** and **Türkiye**. Their impact remained limited due to low rates of public involvement, insufficient information available and limited publication of drafts. In **Bosnia and Herzegovina**, challenges included the lack of reporting on the outcomes of the consultation, little advance information and minimal proactive outreach by authorities. Limited uptake was reported in **Kosovo** where 170 comments were received in 2024 on 460 draft laws and sublegal acts published on the platform. **North Macedonia** saw a sharp decline of published laws, from 79 in 2021 to 48 in 2024, coupled with declining public engagement.

Over-reliance on emergency procedures for the adoption of laws remained a concern in 2024 as well. In **Albania**, of the 267 draft laws adopted, 177 were exempted from the public consultation process, amounting to 66% of all laws adopted in 2024. Urgent procedure was relied upon extensively in **Bosnia and Herzegovina** including for critical laws such as the Law on the Budget and the Law on Public Procurement adopted by the Parliamentary Assembly of Bosnia and Herzegovina, as well as the Criminal Code and the Law on the Special Registry and Publicity of the Work of Non-Profit Organisations in Republika Srpska. In **North Macedonia**, the use of fast-track adoption procedures was of particular concern as 78% of government-sponsored laws were adopted through such procedures. In **Serbia**, the use of urgent procedures remained common, although the proportion of laws adopted without a consultative process decreased to 42% in 2024, compared to 47% in the previous year.

Across the region, the proportion of CSOs participating in the survey reporting that they were effectively consulted in the drafting of laws, bylaws, strategies, other acts of public interest and policy reforms in 2024, declined to under one-fifth, 19%, the lowest value to date.

Figure 3. Proportion of CSOs stating that they were effectively consulted in the drafting of laws, bylaws, strategies or acts of public interest and policy reforms



The proportion was highest in **Albania** where 32% of CSOs stated that they were effectively consulted by authorities, and lowest in **Türkiye** where 11% of respondents stated the same. A drop was reported in all countries with the exception of **Serbia** which saw an increase of 6%, and **Türkiye** where the level remained the same as in 2023. **Bosnia and Herzegovina** reported the highest decrease, 17%, closely followed by **Kosovo** at 16%.

By contrast, almost two-thirds, 61%, of respondents from among public officials were of the view that CSOs were effectively consulted in the development of laws, bylaws, strategies and other acts of public interest for which their institution was responsible. A similar proportion, 65%, stated that public consultation processes of which they were aware took into account sufficiently or fully the views of all communities and groups affected by the laws, policies and strategies that were being consulted.

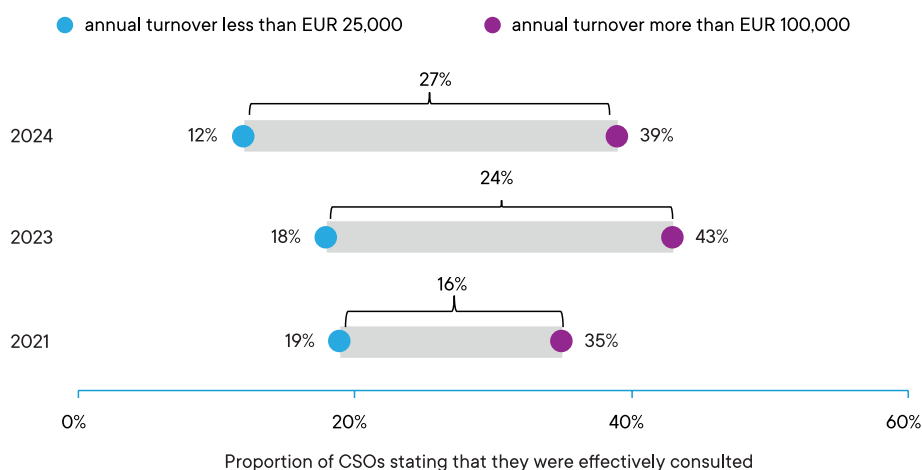
Where CSOs were of the view that they were effectively consulted, as in 2023, they tended to be larger organisations: of those that thought they were effectively consulted, 44% had the annual turnover of more than EUR 100,000, while 24% of CSOs with the annual turnover under EUR 25,000 or no turnover were of the same view.

Figure 4. Proportion of CSOs stating that they were effectively consulted in the drafting of laws, bylaws, strategies or acts of public interest and policy reforms, by annual turnover, in EUR



The gap between small and large organisations that felt they were effectively consulted grew over time as the proportion of organisations that were of the view that they were effectively consulted increased among those whose annual turnover exceeded EUR 100,000 and declined among those whose annual turnover was below EUR 25,000.

Figure 5. Difference in perception of CSOs stating that they were effectively consulted between CSOs with an annual turnover under EUR 25,000 and those with an annual turnover over EUR 100,000, across years



Box 1

Civil society participation in the EU accession process

Civil society in the six candidate countries and one potential candidate faced shared challenges with regard to the effectiveness of their participation in the EU accession process. The new Growth Plan for the Western Balkans provided an opportunity for additional financing in support of accession, with the financing linked to meeting conditions agreed in a Reform Agenda. A major milestone was achieved in October 2024 when the Commission approved the Reform Agendas of **Albania, Kosovo, Montenegro, North Macedonia** and **Serbia**. **Bosnia and Herzegovina** failed to submit its Reform Agenda due to internal political disagreements and gridlock.

Albania's Reform Agenda was adopted in October 2024 following a consultation process which involved CSO representatives, the private sector and other stakeholders in five meetings organised as part of the Partnership Platform for EU Integration. Nevertheless, given that the agenda was adopted relying on urgent procedure, meaningful involvement of civil society was hindered by time constraints.

While in **Kosovo** the consultation process for the Reform Agenda formally included CSOs, its design and timing limited meaningful incorporation of stakeholder input. A public consultation meeting was held in May 2024, when CSOs were briefed on the draft Agenda and invited to provide comments both orally and in writing. However, the incorporation of their input into the final document was minimal as, apparently, it was largely finalised before consultations began.

In **North Macedonia**, the adoption of the Reform Agenda was marred by the lack of meaningful consultation. In an election year, the development of the agenda was urgent, influenced by political shifts and largely disconnected from the public, in spite of consultations with civil society which took place between late 2023 and April 2024. Moreover, despite numerous donor-supported discussions and draft models presented in the past, the country still lacked a formal model for stakeholder inclusion and the participation of CSOs in the EU accession process.

In **Serbia** too, the Reform Agenda was adopted following limited public dialogue resulting in the lack of clarity on how priority areas were set. While CSOs continued to actively engage in monitoring reforms, advocating for transparency and promoting transparency, their influence remained limited. The National Convention on the EU was the main civil society platform representing the interest of citizens in the EU accession process. The extent to which its recommendations were implemented by the government remained insufficient.

Even though a candidate country since 1999, **Türkiye** was not included in the Growth Plan. Its accession process has effectively stalled in recent years and there were no breakthroughs in 2024. In repressed civic space, CSOs remained sidelined in **Türkiye's** EU accession 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

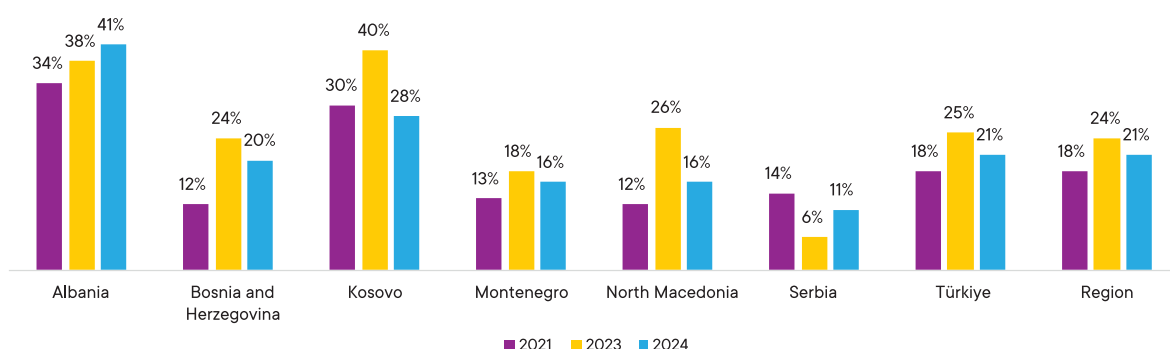
	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	3	1	2	1	1	1	2
2023	2	2	2	1	2	1	2
2021	2	1	2	1	1	1	1

Across the region, with the exception of **Albania**, CSO perception of the attitude of public officials towards civil society remained largely negative, in line with previous years. In 2024, just over one-fifth, 21%, of participating CSOs reported that, in their view, the attitude of public officials towards civil society was supportive.

Proportion of CSOs assessing the attitude of public officials as:		
	Supportive	Not supportive
2024	21%	67%
2023	24%	66%
2021	18%	72%

The most favourable perception of the attitude of public officials was held by CSOs in **Albania** where 41% of respondents stated that they saw the attitude of public officials as supportive. The least favourable perception was held by CSOs in **Serbia** where 11% of respondents stated the same. Both countries saw an increase in positive perception compared to 2023: 5% in **Serbia**, and 3% in **Albania**. In all other countries, the positive perception fell, with drops ranging from 12% in **Kosovo** and 10% in **North Macedonia**, to 2% in **Montenegro**.

Figure 6. Proportion of CSOs assessing the attitude of public officials as supportive



It remains concerning, nevertheless that more than two-thirds, 67% of CSOs across the region were of the view that the attitude of public officials towards civil society in their countries was not supportive. This sentiment was highest in **Serbia** at 82% and lowest in **Albania** at 52%. The increase in the proportion of CSOs that thought the attitude of public officials towards civil society was negative ranged from 14% in **Kosovo**, and 8% in **North Macedonia** to 5% in **Montenegro**. With the exception of **Serbia** where the level remained the same, **Türkiye**, **Albania** and **Bosnia and Herzegovina** all saw decreases of 6%, 5% and 2%, respectively.

By contrast, a significant majority of public official respondents, 69%, stated that public authorities in their countries were sufficiently or very supportive of civil society. This view was the strongest in **Albania** and **Montenegro**. Only in **Serbia** and **Bosnia and Herzegovina** around one-third of respondents were of the view that public officials were insufficiently or not at all supportive of civil society. .

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

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

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	1	1	1	5	5	5	1
2023	5	1	5	5	5	5	1
2021	5	1	5	1	1	1	1

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	1	1	1	5	3	1	1
2023	1	1	5	5	3	5	1
2021	1	1	5	1	1	1	1

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

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

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

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

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

In 2024, valid civil society cooperation strategies were in effect in **Montenegro**, **North Macedonia** and **Serbia**. In **Montenegro** and **Serbia**, the respective strategies were adopted in 2022, and, consequently, no consultation on the development of the new strategy had taken place in 2024. In **North Macedonia**, the conclusion, in 2024, of the Strategy for the Cooperation and Development of Civil Society Organizations, adopted in 2021, was accompanied by a new consultation process initiated toward the end of the year, and a learning exercise, in 2025, to inform the development of the new strategy. Although **Albania**'s civil society cooperation strategy ended in 2023, there was no consultation process initiated regarding the development of a new strategy, although an evaluation of the progress made by the strategy was conducted. By contrast, consultations on the development of a new strategy were ongoing in **Kosovo** where the previous civil society cooperation strategy also ended in 2023. **Bosnia and Herzegovina** saw the beginning of the consultation process to develop the first ever national civil society cooperation strategy. In **Türkiye**, no consultation took place on the draft Civil Society Strategy Document and Action Plan 2023–2027 open for consultation in 2022 but never adopted.

Civil society cooperation strategy in effect and civil society consultation in the preparation of the new strategy, in 2024

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Civil society cooperation strategy in place	No Ended in 2023	No	No Ended in 2023	Yes 2022–2026	Yes 2022–2024	Yes 2022–2030	No
Strategy development consultation process	No	Yes	Yes		Yes		No

The first consultation meeting with CSOs in **Bosnia and Herzegovina** on the development of the first ever Strategy for the Creation of an Enabling Environment for Civil Society Development 2024–2028 was held in June 2024. The draft strategy was developed jointly by the representatives of the Advisory Body of the Council of Ministers of Bosnia and Herzegovina for Cooperation with Non-Governmental Organisations, who were CSO representatives, and the Ministry of Justice. A public call for comments was launched and CSOs were invited to submit their comments through the web portal www.ekon-sultacije.gov.ba. A considerable number of submissions was received, and following their incorporation in the draft strategy, a second round of in-person consultations was held in December 2024. The Ministry of Justice is expected to publish a consultation report to complete the process. CSOs involved in the consultation saw the process as inclusive and were pleased with the proactive approach shown by government institutions toward CSOs. In their view, a number of relevant issues were discussed in the process, such as funding, organisational sustainability, implementation of laws, and shrinking civic space,

with the expectation that they will be addressed in the strategy. Some CSOs that did not participate in the consultation process cited lack of staffing and scheduling conflicts as reasons for not participating.

In **Kosovo**, the development of the new Government Strategy for Cooperation with Civil Society 2025–2030 was coordinated by the Office for Good Governance/Office of the Prime Minister. The process hinged on a formal Working Group comprising CSO and government representatives who met in a series of structured meetings. In addition, a consultation meeting was organised by the Office for Good Governance with CSO partners in June 2024, bringing together around 25 CSO representatives, including from minority communities. CSO perception of the effectiveness of the consultation process was mixed. Some felt that their ability to contribute meaningfully was limited primarily because of the lack of advance access to the draft document and relevant materials. Others noted that the purpose and the expectations for their involvement were not clear from the outset. The absence of follow-up was cited as a concern, as participants did not know whether their input was taken into consideration and influenced the draft. Nevertheless, they expressed continued willingness and interest in participating in future consultation processes which, they hoped, would demonstrate greater transparency, structure and responsiveness. The absence of online participation options was noted as a significant limitation.

In **North Macedonia**, as the Strategy for Cooperation and Development of Civil Society Organisations 2022–2024 reached its end, the Sector for Policy Analysis and Coordination of the Unit for Cooperation with CSOs began the consultation process for a new strategy for the period 2025–2028. In late 2024, CSOs were invited to propose activities for inclusion in the new strategy, and nine proposals were received.

Across the region, civil society cooperation with governments was hindered not only by the lack of strategies in most countries, but also by the lack of budgeted action plans in those countries where strategies were in place. In **North Macedonia**, effective implementation of the civil society cooperation strategies was hampered by the fact that, although the strategy was accompanied by an Action Plan for 2022–2024, the government had failed to allocate the funds required for its implementation. In **Serbia**, the consultation process on the draft 2024–2025 Action Plan for the Implementation of the Strategy for the Creation of an Enabling Environment for the Development of Civil Society 2022–2030 began only in April 2024, and was not adopted by the end of the year. Consequently, the strategy was not accompanied by a budgeted action plan. Scepticism about the relevance and effectiveness of national civil society cooperation strategies therefore remained evident in all countries that had such strategies as a mere 10% of CSO respondents from those countries considered the strategies to be relevant and effective. The proportion of participating CSOs that considered the strategy to be relevant and effective was 14% in **Montenegro** and 9%, respectively, in **North Macedonia** and **Serbia**.

In 2024, public structures responsible for the implementation of civil society cooperation strategies continued to face challenges similarly to previous years, including insufficient human and financial resources, and overreliance on official development assistance. Previous shifts in mandates and responsibilities, which resulted in decreased political leverage, continued to hinder the effectiveness of some offices for cooperation. In **Albania**, the institution responsible for the cooperation with civil society was the Ministry of Health and Social Protection. Its institutional capacity, however, remained limited. In **Kosovo**, the Office for Good Governance continued to face challenges related to insufficient technical expertise, in spite of minimal staffing increases and modest improvements in digital infrastructure. To be able to fulfil its role in the development of the new Strategy for Cooperation with Civil Society 2025–2030, the Office relied on the technical and logistical support of civil society partners, including the CIVIKOS Platform and the Kosovar Civil Society Foundation, and EU support via the EU TACSO 3 project. In **North Macedonia**, the Unit for Cooperation with the Civil Society Sector at the General Secretariat remained responsible for coordinating the strategy implementation process. Its effectiveness was limited due to insufficient staffing coupled with the reduced workload due to the continued boycott, by CSOs, of the Council for Cooperation with the Civil Society Sector. In **Serbia**, the Department within the Ministry of Human and Minority Rights and Societal Dialogue, responsible for the implementation of the civil society cooperation strategy, continued to operate with limited human, financial and material resources. The Department remained understaffed requiring the engagement of external consultants, financially dependent on foreign donors, in particular USAID and the Swiss Agency for Development

and Cooperation. Bureaucratic inefficiencies further hindered the Department's ability to operate effectively, according to employees in the sector.

Meaningful inclusion of CSOs in civil society cooperation councils in 2024 deteriorated in comparison with the previous year, with the exception of **Bosnia and Herzegovina** and **North Macedonia** where the situation did not change. The Advisory Body of the Council of Ministers of **Bosnia and Herzegovina** for Cooperation with Non-Governmental Organisations continued to serve as the mechanism for dialogue between the government and civil society. Its 2024 work programme was agreed at the end of the previous year, along with a schedule of meetings. The development of the draft Strategy for the Creation of an Enabling Environment for Civil Society Development 2024–2028, and its inclusion in the process, was seen as the Advisory Body's principal success. While members felt that they were able to make a meaningful contribution to the work of the Advisory Body, they, nevertheless, felt that the body served for window-dressing purposes to tick off EU requirements. This is because the Council of Ministers of Bosnia and Herzegovina, although it was supposed to hold four meetings annually with the Advisory Body, continued not to engage. The same was the case with the Minister of Justice who also did not meet with the Advisory Body. The mandate of the Advisory Body expired at the end of 2024. In **North Macedonia**, the Government Council for Cooperation with the Civil Society Sector, formally the main channel for consulting and engaging civil society in policy dialogue and decision-making processes, remained inactive throughout 2024 due to the continued boycott by civil society representatives protesting the relocation of responsibility for managing funds for civil society away from the government Unit for Cooperation with the Civil Society Sector. Attempts by the Civic Resource Centre to reset the relations so that the Council would resume its work were unsuccessful. The term of the members expired in July 2024. In December 2024, the Decision Establishing the Council for Cooperation Between the Government and Civil Society was amended with the aim of improving Council's functionality and engagement. Changes included reducing the number of members, amending the composition of ministry representatives in line with the recent restructure of the state administration, and reassessing the areas of work for CSOs. To ensure the legitimacy of future elections for membership, a mandatory minimum number of votes was established for elections to be considered valid. Moreover, the amendments introduced new obligations for CSOs to 'actively inform, consult, and engage key stakeholders' in their respective areas of work.

Elsewhere the situation deteriorated. In **Albania**, the National Council for Cooperation with Civil Society did not have an annual workplan in 2024, unlike in the previous year. Although the requirement of the minimum number of Council meetings was met, CSO representatives were of the view that the preparation and follow-up to the sessions was not adequate. The Council's internal regulation was supposed to be revised in a process supported by the OSCE Mission to Albania; however the process was not transparent and the outcome remained unknown. At best, the Council played a marginal role in promoting better involvement of CSOs in policy making. New members were not adequately inducted and representatives from public institutions were disengaged. In **Kosovo**, the Council for Government Cooperation with Civil Society was not operational, as new members were not appointed following the expiration of its mandate in December 2023. Although established in 2023 amid hopeful expectations, the Council for the Creation of an Enabling Environment for the Development of Civil Society in **Serbia** saw its effectiveness undermined by systemic barriers and the overall hostile environment for civil society. In 2024, the Council had a work programme, rules of procedure and regular meetings. Although the rules of procedure were amended to allow for the creation of thematic expert sub-groups, several procedural gaps weakened its effectiveness. One issue was the lack of a clear process for the replacement of members who left their organisations; another that members lacked capacity on how to effectively advise the government. Most importantly, however, the fact that Council recommendations could not be submitted directly to the government turned out to be a major shortcoming. Any documents approved by the Council for consideration by the government had to be submitted through the Ministry of Human and Minority Rights and Societal Dialogue, with approvals from the Ministry of Finance and the Secretariat for Legislation. This lack of direct influence, along with its inability to respond to emerging threats, created the perception that the Council lacked the ability to shape government policy. Therefore, while the formal structure for dialogue between CSOs and the government was in place, its impact was severely limited.



Specific Objective 3

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

The dismantling of US Agency for International Development (USAID) in February 2025 has had a seismic effect on the sustainability of CSOs across the region and beyond. At a time when bilateral donors are shifting away from international aid, its detrimental impact has been beyond funding, as the anti-civil society rhetoric accompanying the policy reverberated globally, exacerbating the hostile environment.

Financial transparency of CSOs has been one casualty of such hostile environment. In 2024, 57% of participating CSOs published their annual report while 52% published their financial statements. However, just over one-quarter, 28%, published both on their website, in hard copy or on social media. Some respondents stated they did not publish annual reports or financial statements for reasons such as lack of capacity or resources. Nonetheless, for a considerable proportion of respondents, non-publication was a way to mitigate risks of harassment and smear campaigns by avoiding public exposure. The proportion of CSOs that published information on their sources of funding and amounts received remained low in 2024 as just over one-quarter of participating CSOs, 26%, reported publishing such information.

Even so, at the regional level, in 2024, the degree of public trust in CSOs rose slightly to 40%, from 38% in 2023. The increase was due principally to the jump in **Albania**, where public trust grew by 16%, along with **Serbia** where it grew by 1%. Everywhere else, public trust in CSOs dropped slightly. Nevertheless, across the region, public trust in CSOs remained generally higher than public trust in a range of institutions such as government, parliament, political parties, and, in some countries, the media.

With regard to the diversification of the CSO funding base, the situation in 2024 remained similar to previous years both in terms of the diversity of donors and the diversity of sources of funding. The proportion of CSOs not receiving funding from donors, however, increased. Participating CSOs that received donor funding in 2024 reported a rate of diversification of sources of donor income similar to previous years. Across the region, 54% of participating CSOs reported that no single donor type contributed more than 50% of their income. European Union, foreign private foundations and international NGOs were the most significant donors, providing funding to 55% of participating CSOs, respectively. Moreover, national authorities, including central, regional and local governments, provided funding to 50% of participating CSOs. The proportion of CSOs raising funds from sources other than donors remained similar to previous years with 69% of participating CSOs reporting that they had at least one additional source of other income. The most prevalent sources of non-donor income were individual donations and membership fees. For the majority of CSOs, however, these sources of funding contributed at best about one-quarter of their annual budget. With regard to CSOs reporting that they received no donor funding in 2024, at 25%, their proportion doubled compared to the previous year. These CSOs tended to be small organisations, mostly with annual turnovers of under EUR 5,000, that relied primarily on volunteers and other sources of funding such as membership fees and individual donations. For a summary of a deep dive analysis on financial sustainability, see Box 3 on page 75.

Across the region, the independence of governing boards remained a challenge for organisational accountability as 40% of participating CSOs reported having an independent and effective governing body, a decrease compared to both 2023 and 2021. While governing bodies continued to be effective – 97% of participating CSOs reported having a founding governance document – their independence remained a concern as 53% of participating CSOs reported that their executive director or another paid staff member were voting members of the organisation's governing body.

Gender equality in CSOs remained elusive in 2024 as, at 41%, the proportion of CSOs that reported having an organisational gender equality policy was the lowest since 2021. At 48%, CSOs working on human rights were more likely to have a gender equality policy than CSOs working on other issues. The gap be-

tween the two widened by 3% compared to 2023, to 14% in 2024. Overall, the lack of organisational policy frameworks remained one of the most significant shortcomings of organisational accountability, as virtually no CSOs reported having in place the package of human resource policies under consideration.

Similarly to previous years, participating CSOs remained committed to basing their work on evidence gathered through research, evaluating their work mostly through project-level evaluations, and communicating the results of their activities through online channels of communication.

A more detailed overview of research results by each specific objective is presented below while the assessment of the respective indicators and related analysis for each IPA beneficiary is included in the Annexes 1–7. Summaries of deep-dive research into the issues of constituency engagement, civil society financial sustainability and human resource management are also included below.

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

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

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	2	1	2	1	1	1	1
2023	2	1	2	1	1	1	1
2021	1	1	2	1	2	1	1

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

- their statutes
- governance structure
- organisational policies

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

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	3	2	3	2	2	3	3
2023	3	2	3	2	2	2	3
2021	3	2	3	2	2	3	3

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

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

Research has shown that in 2024, there was no significant change, compared to previous years, in how CSOs' internal governance structures followed the principles of good governance. Most results remained aligned across the years with the exception of the decline in the compliance with standards concerning the effectiveness and independence of governing bodies. While the prevalence of a founding governance document in organisations remained virtually universal, the independence of governing bodies remained a concern. Organisational transparency and gender equality remained at comparable levels since 2021.

In 2024, across the region 40% of participating CSOs reported having an independent and effective governing body, a decrease compared to both 2023 and 2021.

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

Their proportion was highest in **Albania** at 59% and lowest in **Türkiye** at 23%. The performance under this indicator improved for **Kosovo** only, given the increase of 11% compared to the previous year. **Türkiye** and **Montenegro**, meanwhile, saw significant drops of 32% and 19%, respectively. While governance continued to be properly set up, with 97% of respondents indicating that their CSO had a governing document, and 94% indicating that their organisation had a governing body, only 43% stated that their executive director or another paid staff member was not a voting member of their governing body, a drop of 13% compared to 2023, and 5% compared to 2021. The proportion of participating CSOs with paid staff as voting members of their governing body was highest in **Türkiye** at 70%, and lowest in **Kosovo** at 34%.

The proportion of CSOs that checked potential conflict of interest with regard to the political, economic and personal relationships of the members of their governing body on an annual basis remained low across the region.

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

The highest proportion was reported in **Albania** and **Kosovo** 29%, respectively, and the lowest in **Türkiye**, 8%. There was no improvement in performance under this indicator, while the highest drops were noted in **Bosnia and Herzegovina**, 8%, and in **Kosovo**, 7%.

While organisational transparency, understood as sharing relevant information using accessible channels of communication, improved in 2024 compared to 2023, it nevertheless missed the level reached in 2021.

Proportion of CSOs that publish their statutes and governance structure

2024	29%
2023	23%
2021	30%

In 2024, under one-third of participating CSOs, 29%, reported that they published their statutes and governance structure on their website, although 56% reported having a website. The highest proportion of CSOs publicly sharing such information was in **Türkiye**, 41%, and the lowest in **Kosovo** and **Serbia**, 13%, respectively. The highest increase in the proportion of CSOs publishing this information was reported in **Bosnia and Herzegovina**, 16%, while **North Macedonia** was the only one to report a decrease amounting to 4%.

Gender equality in CSOs remained elusive in 2024 as, at 41%, the proportion of CSOs that reported having an organisational gender equality policy was the lowest since 2021.

Proportion of CSOs that have an organisational gender equality policy

2024	41%
2023	42%
2021	44%

At 50%, the proportion of CSOs that reported having an organisational gender equality policy was highest in **Albania**, and lowest in **North Macedonia** where 34% of participating CSOs reported the same. The decline was highest in **Türkiye**, 13%, as opposed to **Serbia** where the proportion of CSOs increased by 6% compared to the previous year. Of those that reported having a gender equality policy, 48% were organisations working on human rights, gender equality and LGBTIQ rights, minority rights and non-discrimination, rights of persons with disabilities, children's rights or social inclusion. On the other hand, organisations that did not work on these issues were less likely to have such a policy: 34% of such CSOs reported having a gender equality policy. Therefore, CSOs working on human rights were more likely to have a gender equality policy, with the gap between the two widening by 3% compared to 2023.

The proportion of participating CSOs that reported having an organisational strategy document remained constant across the years.

Proportion of CSOs that have an organisational strategy

2024	68%
2023	68%
2021	66%

In 2024, two-thirds of participating CSOs, 68%, reported having a strategy document. The highest proportion of CSOs with a strategy document was reported in **North Macedonia**, 79%, while the lowest was in **Türkiye**, 60%. The largest change was reported in **Türkiye**, where the proportion of CSOs having a strategy dropped by 11%. The highest increases of 9%, respectively, were reported in **Albania** and **Serbia**.

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

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

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

Indicator 3.2.b: Proportion of CSOs that have specialised communication staff²⁰

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

As in previous years, in 2024, the prevalence of online channels of communication used by CSOs continued to be virtually universal. Reported cooperation with the media, however, continued to decline.

In 2024, 96% of participating CSOs reported using at least one channel of communication, a proportion in line with previous years.

Proportion of CSOs that have at least one online channel of communication	
2024	96%
2023	97%
2021	98%

Their proportion ranged from 99% in **North Macedonia** to 93% in **Kosovo**. Percentage change ranged from an increase of 4% in **Montenegro** to a decrease of 3%, both in **Kosovo** and **Türkiye**. Two-thirds of participating CSOs, 64%, reported using three or more channels of online communication at least once a month. Facebook, used by 82% of participating CSOs, remained the most popular, followed by Instagram, 64%, and messaging apps, 37%. More than half, 56%, reported having a website.

Cooperation with the media, however, declined steadily in 2024, by 5% compared to 2023, and 8% compared to 2021.

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

The highest level of cooperation with the media, 34%, was reported in **Kosovo**, and the lowest, 16%, in **Montenegro**. **Montenegro** also reported the highest drop compared to the previous year, 13%, while **Kosovo** and **Türkiye** were the only ones to report an increase, 5% and 3%, respectively.

²⁰ This indicator is not reviewed for 2023 as the related question was deleted from the CSO survey.

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	2	2	1	2	3	2	2
2023	2	2 ²¹	2	2	3	1 ²²	2
2021	2 ²³	3	2 ²⁴	3	3 ²⁵	2 ²⁶	2 ²⁷

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	2	2	2	2	2	2	1
2023	2	2	1	2	2	1	2
2021	2	2	2	2	2	2	2

Indicator 3.3.c: Degree of public trust in CSOs²⁸

As in previous years, financial transparency remained a challenge for CSOs across the region as the proportion of CSOs that published their annual reports and financial statements, as well as sources of funding and amounts received remained low.

In 2024, 57% of participating CSOs published their annual report while 52% published their financial statements. However, just over one-quarter, 28%, published both on their website, in hard copy or on social media. This was at a level comparable to 2023, although an 8% drop in comparison with 2021.

Proportion of CSOs that published their annual report and financial statements	
2024	28%
2023	27%
2021	36%

The highest rate of transparency was reported in **North Macedonia**, where 46% of participating CSOs indicated that they published both the annual report and financial statements, and the lowest in **Kosovo**, where 20% of respondents stated the same. In comparison with 2023, the highest increase in transparency, 9% was reported in **Serbia**, while the highest decrease, 8% was reported in **Türkiye**. Neverthe-

²¹ The 2023 value for Indicator 3.3.a was originally published as 51%; the revised value for 2023 is 31%.

²² The 2023 value for Indicator 3.3.a was originally published as 24%; the revised value for 2023 is 16%.

²³ The 2021 value for Indicator 3.3.a was originally published as 44%; the revised value for 2023 is 25%.

²⁴ The 2021 value for Indicator 3.3.a was originally published as 48%; the revised value for 2021 is 31%.

²⁵ The 2021 value for Indicator 3.3.a was originally published as 66%; the revised value for 2021 is 52%.

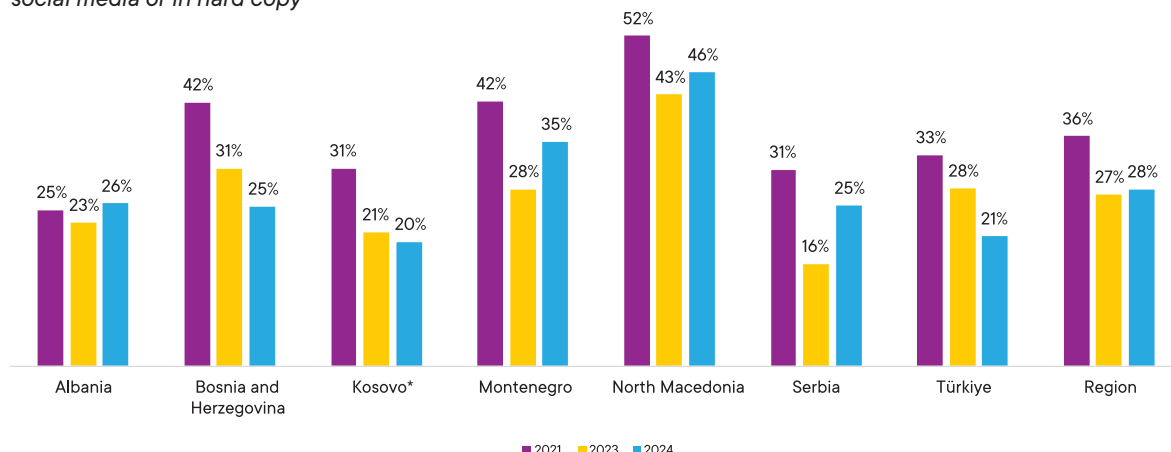
²⁶ The 2021 value for Indicator 3.3.a was originally published as 45%; the revised value for 2021 is 31%.

²⁷ The 2021 value for Indicator 3.3.a was originally published as 46%; the revised value for 2021 is 33%.

²⁸ 2023 is the first year in which this indicator is reviewed. The source of data is the Balkan Barometer of the Regional Cooperation Council, <https://www.rcc.int/balkanbarometer/>. Data for Türkiye is not available as the country is not included in the Balkan Barometer.

less, in comparison with 2021, with the exception of **Albania** where the level remained virtually the same, a drop in publication rates was noted in all countries; in **Bosnia and Herzegovina**, the fall was as high as 16%, followed by **Türkiye** with 13%.

Figure 7. Proportion of CSOs that publish financial statements and annual reports on organisational website, social media or in hard copy



When asked why they did not publish annual reports or financial statements, respondents cited reasons such as lack of capacity or resources, including not having a website. A number of respondents were from small organisations that had no activities or funding in 2024. Others shared the reports with members or donors only. Some did not consider the publication of reports to be in the public interest. As in previous years, a considerable proportion of respondents were of the view that the submission of reports to the statutory regulatory body was sufficient. Importantly, for a number of respondents non-publication was a way to mitigate risks of harassment and smear campaigns.

Similarly, the proportion of CSOs that published information on their sources of funding and amounts received remained low in 2024. Just over one-quarter of participating CSOs, 26%, published both the sources of funding and amounts received.

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

Their proportion was highest in **North Macedonia**, 34%, and lowest in **Türkiye**, 20%. Compared to 2023, at 8%, **Serbia** reported the highest increase in the proportion of CSOs publishing such information; **Bosnia and Herzegovina** saw the highest drop, 9%.

At the regional level, in 2024, the degree of public trust in CSOs rose slightly to 40%, from 38% in 2023. The increase was due principally to the jump in **Albania**, where public trust grew by 16%. Everywhere else, with the exception of **Serbia**, public trust in CSOs dropped, from 5% in **Kosovo** to 1% in **Bosnia and Herzegovina**. Nevertheless, across the region, public trust in CSOs remained higher than public trust in a range of institutions such as government, parliament, political parties, and, in some countries, the media.

Public perceptions of public institutions and services, in 2024*

Proportion of respondents that 'tend to trust' or 'totally trust' the following institutions, *more* or *less* than CSOs

	CSOs	Government	Parliament	Political parties	Media	Judicial institutions	Police	Military
Regional level	40	37	33	23	39	42	56	58
Albania	46	54	40	24		53	69	66
Bosnia and Herzegovina	38	24	23	18	37		53	48
Kosovo	45	43	42	22	30	46	75	76
Montenegro	37	38	41	35	39	47	43	43
North Macedonia	32	17	16	14	41	14	35	43
Serbia	41	46	37	21	40	51	60	69
Türkiye**	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

* Source: Regional Cooperation Council, Balkan Barometer Survey, <https://www.rcc.int/balkanbarometer/results/2/public>.

** Data not available as the country is not included in the Balkan Barometer.

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

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

In 2024, CSO commitment to organisational learning remained high, at a level comparable to previous years: 77% of participating CSOs reported having carried out at least one evaluation of their work.

Proportion of CSOs that have carried out an evaluation of their work

2024	77%
2023	80%
2021	81%

The highest proportion of CSOs carrying out evaluations was reported in **Montenegro**, 86%, and the lowest in **North Macedonia**, 70%. When compared to 2023, **Türkiye** reported the highest decrease, 13%, followed by **North Macedonia**, 12%. The most considerable increase was reported in **Montenegro**, 8%. Project level evaluations remained the most frequent form of evaluation, as reported by 61% of participating CSOs, with the evaluation of an internal process a distant second at 33%. One-seventh of participating CSOs, 14%, stated that they did not carry out an evaluation in 2024. Principal reasons for not evaluating included lack of capacities and resources, and lack of programmatic activities during the year.

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

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

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

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

In 2024, the level of commitment to evidence gathering and stakeholder consultation remained high across the region.

At 80%, the proportion of CSOs whose work was based on evidence generated through research remained comparable to previous years.

Proportion of CSOs whose work is based on evidence generated through research	
2024	80%
2023	82%
2021	83%

The highest rate of research, 93%, was reported in **Albania**, and the lowest, 74%, in **Bosnia and Herzegovina**. **Türkiye** reported the highest decrease, 13%, compared to the previous year. Focus group discussions, carried out by 48% of respondents, was the most frequently used research method, followed by surveys of specific groups undertaken by 38% of respondents. One-seventh of respondents, 15%, reported not having carried out any research in 2024. Reasons cited included lack of capacities, resources or need to carry out research.

With regard to stakeholder consultation, 93% of respondents stated that they carried out at least one consultation with people who had a stake in their work in the course of 2024, at a level comparable to 2023, but 12% higher than in 2021.

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

The highest proportion of CSOs stating that they carried out stakeholder consultations was reported in **Türkiye**, 96% followed by **Albania** at 95%. The lowest proportion, 91%, was reported in **Kosovo, Montenegro, North Macedonia and Serbia**. At 62%, members remained the stakeholder group consulted most frequently, followed by local communities at 59%, and local authorities at 52%, in proportions similar to 2023.

Box 2

Deep Dive: Constituency Engagement

Constituency engagement remains one of the least defined and inconsistently implemented aspects of civil society practice in the Western Balkans and Türkiye. It is rarely embedded in organisational strategy or day-to-day operations. Many CSOs struggle to articulate who their constituencies are or how they should engage them beyond the immediate scope of project-based activities. As a result, engagement tends to be fragmented and temporary, closely following donor funding cycles rather than long-term relationship-building.

This disconnect is particularly evident in smaller or rights-based organisations, which often lack the resources and security to invest in building public support. Moreover, civil society actors working in politically sensitive areas, such as anti-corruption, governance, or human rights, face reputational risks that limit their ability to mobilise support or form alliances. In countries with more restricted civic space, including Serbia and Türkiye, the threat of public backlash, smear campaigns, or administrative harassment further undermines open engagement.

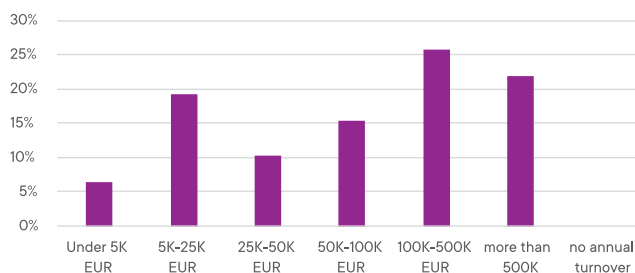
The graph¹ on the right shows that CSOs with higher turnover were more active in consulting with their communities in 2023. Interestingly, CSOs with the lowest turnover, mostly active at the local level, have been the least active in community consultations.

Nonetheless, positive practices exist. Some membership-based and community-led organisations show that structured engagement can

strengthen legitimacy and sustainability. Organisations that consult regularly with communities or design initiatives based on constituent input tend to enjoy greater trust and resilience. However, these practices are not yet widespread. Digital tools remain underutilised, and CSOs rarely segment or analyse their audience. In many cases, CSOs underestimate the potential of their existing networks or local presence to drive deeper public involvement.

It is evident that constituency engagement in the region is shaped by structural factors that limit its development as a sustained organisational practice. Donor-driven project cycles encourage short-term interactions during implementation phases, but do not support continuity once funding ends. At the same time, political pressures, like negative public narratives, discourage broader public association with some CSOs. These dynamics contribute to engagement being treated as secondary within many CSOs, where it is often subordinated to project delivery.

Proportion of CSOs consulting their stakeholders and community by annual turnover, 2023



¹ This chart represents findings on a subset of 138 CSOs that participated in both the 2021 and the 2023 Assessment against the DG ENEST Guidelines for EU Support to Civil Society in the Enlargement Region (2021–2027) surveys. This smaller cohort was analysed to ensure that observed trends were not merely reflective of shifts in sample composition.

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

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

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

In 2024, CSO participation in networks remained strong across the region while CSO engagement in cross-sectoral partnerships stayed at a level comparable to 2023.

Four-fifths of participating CSOs, 79%, took part in local, national or international networks.

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

The majority of CSOs, 59%, reported being a member of national networks, while two-fifths, 40%, reported belonging to international networks. One-sixth of respondents, 16%, reported not taking part in any networks. The highest membership in networks was reported in **Albania** with 90% of participating CSOs taking part, while the lowest level of membership was reported in **Türkiye**, 73%, a drop of 14% compared to 2023. The highest increase was noted in **Montenegro**, 9%.

Cross-sectoral partnerships stagnated in 2024: 55% of participating CSOs reported engaging in cross-sectoral partnerships.

Proportion of CSOs engaged in cross-sectoral partnerships	
2024	55%
2023	57%
2021	data not available ²⁹

One-fifth of respondents, 20%, continued not to engage in any such partnerships. Partnerships with universities, at 37%, remained the most prevalent, followed by CSO partnerships with the private sector, 29%. The highest level of engagement was noted in **Albania** where 68% of participating CSOs stated that they engaged in cross-sectoral partnerships, while the lowest level of engagement, 41%, was reported in **Montenegro**. The share of CSOs engaging in cross-sectoral partnerships continued to decline across the region with the highest decrease compared to 2023 reported in **Bosnia and Herzegovina**, 11%.

²⁹ Due to a survey error, the data for 2021 is not available.

SO 3.7. CSO have a diversified funding base

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

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	3	3	3	3	3	3	3
2023	3	3	3	4	3	4	4
2021	3 ³⁰	3 ³¹	3	2 ³²	3	3	3 ³³

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

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

With regard to the diversification of the CSO funding base, the situation in 2024 remained similar to the year before both in terms of the diversity of donors and the diversity of sources of funding. The proportion of CSOs not receiving funding from donors, however, increased.

Participating CSOs that received donor funding in 2024 reported a rate of diversification of sources of donor income similar to previous years. Across the region, 54% of participating CSOs reported that no single donor type³⁴ contributed more than 50% of their income.

Proportion of CSOs with diversified sources of donor income

2024	54%
2023	55%
2021	50%

The highest proportion of CSOs with a diversified funding base was reported in **Montenegro**, 60%, while the lowest proportion was reported in **Albania**, 41%. The highest increase compared to 2023 was reported in **Kosovo**, 9%, while the highest decrease, 7%, was reported in **Serbia**.

³⁰ The 2021 value for Indicator 3.7.a was originally published as 63%; the revised value for 2021 is 58%.

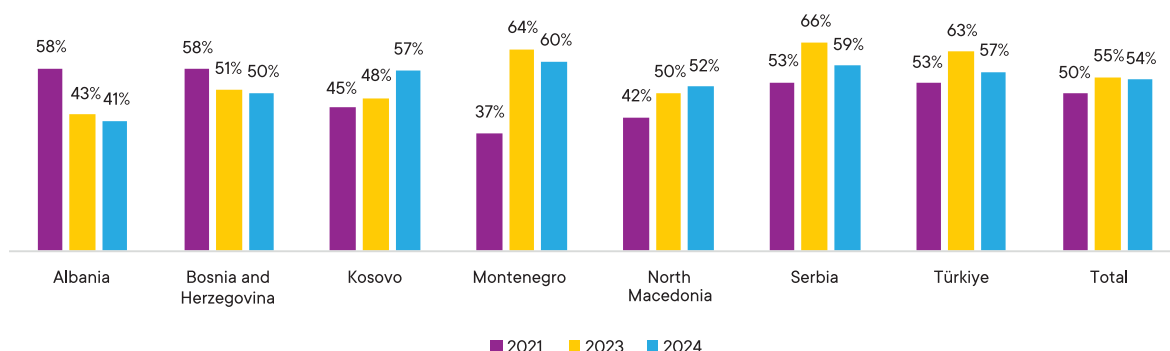
³¹ The 2021 value for Indicator 3.7.a was originally published as 62%; the revised value for 2021 is 58%.

³² The 2021 value for Indicator 3.7.a was originally published as 45%; the revised value for 2021 is 37%.

³³ The 2021 value for Indicator 3.7.a was originally published as 62%; the revised value for 2021 is 53%.

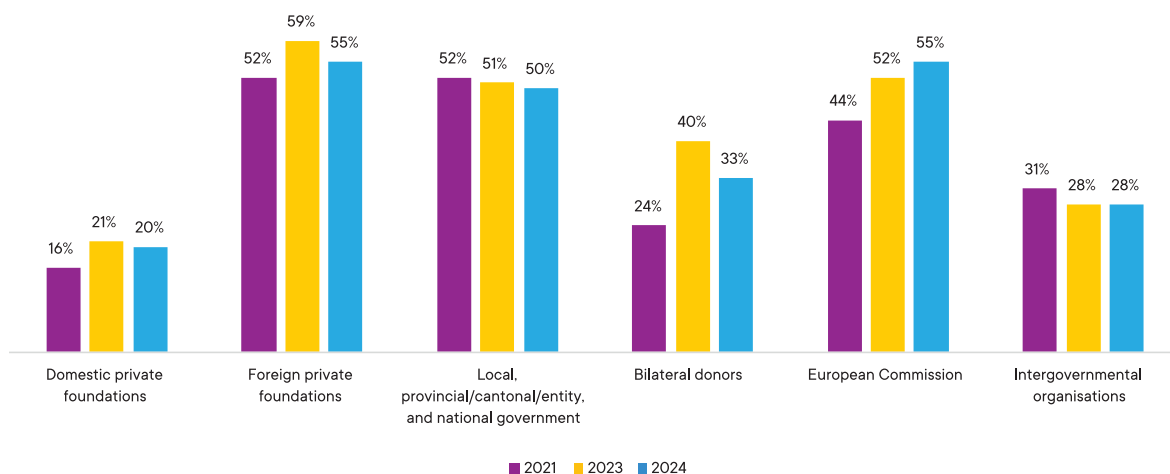
³⁴ Donors were grouped into six types: (1) domestic private foundations; (2) foreign private foundations and international CSOs; (3) local, regional and national government; (4) bilateral donors; (5) European Commission; (6) international organisations.

Figure 8. Proportion of CSOs whose sources of donor income are diversified



European Union, foreign private foundations and international NGOs were the most significant donors in 2024, providing funding to 55% of participating CSOs. The highest proportion of EU grantees was noted in **Montenegro** where 70% of participating CSOs reported receiving EU funding. The smallest proportion of EU grantees was noted in **Kosovo** where 44% of participating CSOs reported receiving such funding. Foreign private foundations and international NGOs provided funding to 68% of participating CSOs in **Albania**, but only to 44% of participating CSOs in **Türkiye**. National authorities, including central, regional and local governments, provided funding to 50% of participating CSOs. In **Bosnia and Herzegovina**, 79% of participating CSOs reported receiving government funding, the highest rate of all. On the other hand, in **Türkiye**, 27% of participating CSOs reported receiving government funding.

Figure 9. Proportion of CSOs that receive funding from different donor types



One-quarter, 25%, of participating CSOs reported that they received no donor funding in 2024, doubling their proportion compared to the previous year.

Proportion of CSOs receiving no donor funding	
2024	25%
2023	12%
2021	14%

The highest proportion of CSOs reporting not having received donor funding was in **Türkiye**, 48%, and the lowest was in **Montenegro** and **Serbia**, 8% each. CSOs in **Montenegro**, **Albania**, and **Serbia** maintained a level of donor funding similar to 2023. There, the proportion of CSOs reporting not receiving donor funding dropped by 3%, 2% and 1%, respectively. In remaining countries, the increase in the proportion of CSOs not receiving donor funding ranged from 38% in **Türkiye**, to 11% in both **Bosnia and Herzegovina** and **Kosovo**, and 10% in **North Macedonia**.

CSOs that reported not having donor funding tended to be small organisations, relying primarily on volunteers and other sources of funding such as membership fees and individual donations. One-quarter, 25%, of CSOs with no donors reported having no annual turnover. A further two-fifths, 40% reported annual turnovers of under EUR 5,000. Four-fifths, 79%, reported having no paid staff, with an additional 13% reporting 1–5 paid staff. They relied primarily on volunteers, as 60% reported between 1–20 people working for their organisation, which included volunteers and interns; 22% reported no people in any roles working in their organisation.

In 2024, the proportion of CSOs raising funds from sources other than donors remained similar to previous years with 69% of participating CSOs reporting that they had at least one additional source of income other than donors.

Proportion of CSOs raising funds from sources other than donors	
2024	69%
2023	66% ³⁵
2021	73%

In all three years, the most diversified in this respect were participating CSOs from **Türkiye** where 80% of respondents reported having additional sources of income. The least diversified were, again, the CSOs in **Kosovo** where 47% of participating CSOs reported the same. Compared to 2023, the proportion of CSOs raising funds from sources other than donors increased most notably in **Bosnia and Herzegovina**, by 8%; it fell most prominently in **Albania**, by 11%.

A majority of respondents, 34%, reported having two other sources of funding. The most prevalent sources of non-donor income were individual donations, reported by 39% of participating CSOs, and membership fees, reported by 37% of participating CSOs. For the majority of CSOs, however, these sources of funding contributed at best about one-quarter of their annual budget. Proportions ranged from crowdfunding contributing from 1–25% of the budget to 6% of respondents, to individual donations and membership fees contributing from 1–25% of the budget to 28% and 26% of respondents, respectively.

Figure 10. Proportion of CSOs that receive funds from other sources, by type

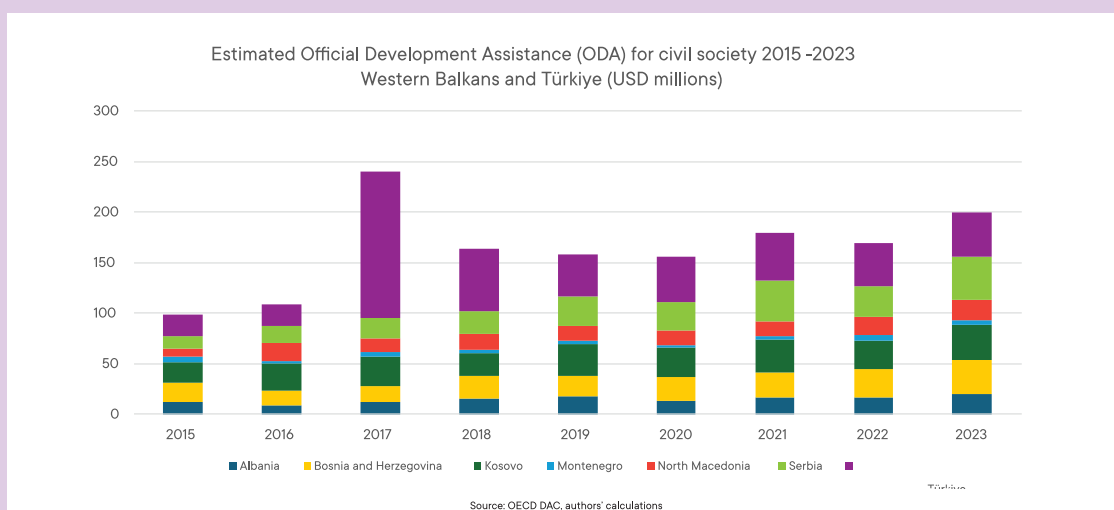


³⁵ The 2023 value for Indicator 3.7.a was originally published as 72%; the revised value for 2023 is 66%.

Box 3 – Deep Dive: Civil Society Financial Sustainability

International donor funding for civil society in WBT has roughly doubled in the period 2015–2023, but it has not resulted in more financially sustainable Civil Society Organisations (CSOs).

Other sources of income, such as from the government and public donations, are modest and full of challenges. Despite the increase in donor funding – or perhaps because of it – the financial situation for most civil society organisations (CSOs) remains highly precarious. International donors, particularly the European Union, remain the dominant funding source. Donor funding is mainly short-term and project based. This offers little operational or strategic flexibility, hinders long-term planning, and often leads to gaps in institutional development. Core funding remains rare. Only a small portion of donor assistance is allocated to organisational infrastructure or salaries, with most tied to time-limited activities.



Alternative funding streams—including social entrepreneurship, fee-based services, individual donations, and corporate partnerships—are emerging but remain underdeveloped and largely supplementary. These models benefit larger, urban-based organisations with higher institutional capacity. Access to public funding mechanisms remains limited and is often characterised by low transparency, political selectivity, and administrative complexity. In several countries, the risk of politicisation in grant-making has discouraged CSOs from applying.

Some progress has been made in national strategies recognising social enterprises and civil society's role in service delivery. However, gaps persist in implementation, legal clarity, and funding access. Financial incentives and support infrastructure are often lacking. Organisations that succeed in diversifying their income tend to be those with stronger visibility, professional staffing, and community backing. Financial management practices vary widely, and few CSOs report having financial reserves or sustainability strategies.

Donor funding that focuses on projects alone will not achieve sustainable development of civil society. For greater impact on a sustainable civil society, donor funding could focus on supporting the civil society ecosystem—the wider environment of government, public, and private interfaces with civil society—as well as the longer-term organisational development of civil society organisations that demonstrate integrity in their mission and activities.

The amount of donor funding remains modest expressed as a proportion of national incomes, so it is feasible to expect that it can be replaced in the longer term by a mix of sources within countries. However, this is conditional on governments demonstrating a commitment to democratic values, enabling civil society development and ensuring fair and transparent public funding.

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

Indicator 3.8.a: Proportion of CSOs that employ staff

Indicator 3.8.b: Proportion of CSOs that have organisational human resources policies³⁶

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
2024	1	1	1	1	1	1	1
2023	1	1	1	1	1	1	1
2021	1	1	1	1	1	1	1

Indicator 3.8.c: Proportion of CSOs that have advertised publicly their staff and volunteering vacancies in the last year³⁷

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

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

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

In 2024, the proportion of CSOs that employed staff fell compared to previous years. While they remained committed to staff development, the adoption of organisational policy frameworks remained a challenge across the region.

Across the region, 64% of participating CSOs reported employing staff in 2024, a decrease compared to previous years.

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

The highest rate of employment was reported in **Albania**, 85%, and the lowest in **Türkiye**, 45%. A decrease in employment was reported in all countries with the exception of **Serbia** where the situation remained stable. The sharpest drop was noted in **Türkiye**, 20%, followed by **Bosnia and Herzegovina**, 15%, and **North Macedonia**, 10%. At 37%, the largest group were CSOs employing 1–5 members of staff. The proportion of CSOs employing six or more staff fell to just over one-quarter, 27%. The proportion of CSOs employing no staff rose to more than one-third, 34%.

³⁶ The following human resource policies were under consideration: recruitment; diversity, equality and inclusion; disciplinary; grievance/complaints; performance evaluation; redundancy; remuneration; bullying and harassment; safeguarding of children and vulnerable adults.

³⁷ This indicator is not reviewed for 2023 as the related question was deleted from the CSO survey.

The adoption of organisational human resource policies remained a challenge as the proportion of CSOs having the policies³⁸ under consideration remained negligible. As in previous years, only 1% of participating CSOs reported having the nine human resource policies in place. One-half of respondents, 51% reported having no such policies in place.

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

More than two-thirds, 66% of respondents, stated that they had at least one policy, but only 14% reported having five or more policies, similar to 2023. The most prevalent policy was again the diversity, equality and inclusion policy, in place in 36% of participating CSOs, followed by policies on recruitment, and bullying and harassment at 27%, respectively. While the proportion of CSOs that reported having a bullying and harassment policy increased by 4% compared to 2023, the proportion of CSOs with a recruitment policy fell by 7%. Nevertheless, the proportion of CSOs that had policies encouraging the recruitment of a diverse workforce remained stable at 16%.

Proportion of CSOs with policies encouraging recruitment of a diverse workforce	
2024	16%
2023	17%
2021	15%

This proportion remained highest in **Albania** where 34% of participating CSOs reported having such policies in place, and lowest in **Türkiye** where 9% reported the same. **Albania** also saw the highest increase compared to 2023, 10%, while **Türkiye** saw the highest drop, 9%.

Nevertheless, CSOs maintained their commitment to investing in staff and volunteers: More than four-fifths, 81%, of CSOs reported enabling their staff or volunteers to attend a training course for the purpose of their professional development in 2024.

Proportion of CSOs whose staff and volunteers attended a training course in the past year	
2024	81%
2023	81%
2021	78%

This proportion was highest in **Montenegro** where 91% of CSOs reported that their staff or volunteers attended training, and lowest in **Kosovo** and **Türkiye** where 78% of CSOs, respectively, reported the same. The increase was highest in **Montenegro** at 9%, while the drop was highest in **Türkiye** at 7%.

³⁸ The following human resource policies were under consideration: recruitment; diversity, equality and inclusion; disciplinary; grievance/ complaints; performance evaluation; redundancy; remuneration; bullying and harassment; safeguarding of children and vulnerable adults.

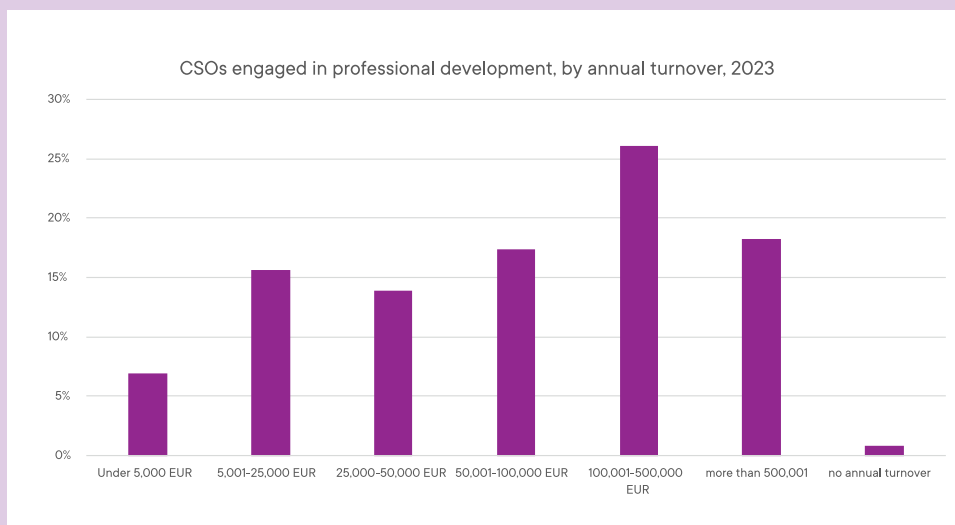
Box 4

Deep Dive: Human Resources Management in CSOs

CSO human resources management continues to be shaped by financial constraints and limited institutional infrastructure. Staff turnover is high, particularly among young professionals, deterred by short-term contracts, limited benefits and career development opportunities. Many CSOs rely on volunteer labour, not by design, but due to funding shortfalls that prevent adequate staffing. Volunteers are sometimes expected to carry heavy workloads, resulting in burnout.

Formal HR policies are not systematically in place. While there has been progress in recruitment guidelines, performance evaluation, and gender equality audits, practices are inconsistent. CSOs with larger budgets or international affiliations are more likely to implement structured HR systems. At the same time, smaller and local organisations operate informally, with limited attention to staff development or wellbeing. The absence of institutionalised support for issues such as mental health or recovery time was noted as a particular gap.

Opportunities for professional development remain limited. Training is typically project-based, and few organisations have internal strategies or budgets for staff learning. Involvement in policy or cross-sector platforms on labour issues is rare, and the civil society sector is generally excluded from national employment frameworks. CSOs are seldom recognised as formal employers, meaning their workforce does not benefit from broader labour protections or incentives. This structural invisibility contributes to the sector's difficulty in attracting and retaining skilled staff and hinders the sector's professionalisation.



The graph on the left shows that, in general, CSOs with higher annual turnover tend to invest more in the professional development of their staff, providing more evidence of the strong relationship between the financial sustainability and availability of funding and CSO (professional) development.

There is an evident connection between the low financial sustainability and the HR management in CSOs. Particularly, the donor funding structure significantly constrains the sector's HR development. For example, salary caps determined by donor budgets often fall below national benchmarks, which limits CSOs' ability to offer competitive compensation, retain qualified staff and invest in their development. This, alongside the absence of recognised qualifications or structured training pathways, results in a realistic perception of CSOs as unstable or transitional employment options, rather than a viable long-term career.

Conclusion

This report presents a snapshot of the implementation of the *DG ENEST Guidelines for EU Support to Civil Society in the Enlargement Region, 2021 - 2027* in 2024, and provides a comparison with the situation in 2023, and 2021 which serves as the baseline.

The report shows little improvement and considerable deterioration in the implementation of the Guidelines across the region amidst shrinking civic space and an increasingly hostile environment for civil society. Cooperation between authorities and civil society continues to require significant improvement. Similarly to previous years, CSO capacity and resilience remain precarious in the area of organisational accountability, transparency and policy.

The conducive environment for civil society to carry out its activities saw major setbacks and decline across the region. While the environment for civil society remained hostile in **Türkiye**, it continued to deteriorate in **Bosnia and Herzegovina** and **Serbia**. The spectre of 'foreign agents' laws continued to haunt the region after such laws were proposed in **Serbia** and **Türkiye**. Although they did not progress, there remained a possibility that they could be reintroduced in 2025, as it happened in the National Assembly of Republika Srpska where the law was finally adopted in February 2025. Human rights protection was further eroded in Republika Srpska as its Criminal Code was amended to remove the concept of gender identity thus undermining the protection of the rights and equality of persons of different gender identities, as well as the protection of CSOs advocating for their equality. Defamation remained criminalised in **Albania**, the Republika Srpska entity of **Bosnia and Herzegovina**, and **Türkiye**. It was encouraging to see examples of highest courts of the land asserting their independence in an attempt to protect the fundamental rights to freedom of expression and freedom of association in countries such as **Bosnia and Herzegovina**, **North Macedonia**, **Serbia** and **Türkiye**. However, court decisions were generally not followed by government action to implement them, resulting often in no change. Intimidation of human rights defenders and journalists continued to escalate, in particular in Republika Srpska and **Serbia** where public officials engaged in smear campaigns, incited hatred against activists and promoted an overall atmosphere of fear. Environmental and LGBTIQ rights defenders continued to be targeted, and, in particular, their right to freedom of peaceful assembly was violated across the region.

The relationship between civil society and authorities remained fraught. A considerable proportion of CSOs participating in the survey reported that they or their members were subjected to threats, attacks, unlawful searches and property damage; at 16%, their proportion has been constant across the years. The provision of public funding remained problematic, due to a deficient legal framework and selection processes that lacked transparency, consistency and accountability. Fewer than one-half of participating CSOs reported that they applied for public funding, and of those that did, almost three-quarters had unsuccessful applications. In fact, only 14% of participating CSOs stated that, in their view, the provision of domestic public funding was transparent and fair. It is, therefore, not surprising that the CSO perception of the attitude of public officials towards civil society declined compared to the previous year to just over one-fifth of respondents, 21%. The perception of surveyed public officials about how they saw their cooperation with civil society, however, was diametrically opposite. Moreover, the degree of public trust in CSOs rose compared to the previous year to 40% across the region;³⁹ the public continued to trust CSOs more than they did the government, parliament, political parties, and the media.

Cooperation and partnerships between CSOs and public institutions remained inadequate. Despite legal frameworks regulating public participation, and the existence of online consultation platforms meant to facilitate it, the inclusion of CSOs in decision- and policy making was neither systematic nor effective. The proportion of participating CSOs reporting that they were effectively consulted in the drafting of laws, bylaws, strategies and other acts of public interest in 2024, declined to under one-fifth, 19%, the lowest value to date. Where CSOs were of the view that they had been effectively consulted, they tended to be larger organisations, as the gap in the perception between large and small organi-

³⁹ With the exception of Türkiye.

sations grew from 16% in 2021 to 27% in 2024. When good practices did happen, they tended to be an outcome of donor funded projects to develop laws, policies and strategies, rather than a reflection of the institutional commitment to meaningful and effective participation of civil society from the earliest stages of the process.

While the EU accession process was supposed to provide a framework for improvement, it has generally failed to deliver. Although legal frameworks have seen some positive change as, for instance, laws on audiovisual media services, anti-money laundering and counter terrorism financing were adopted in a number of countries in compliance with the accession requirements, the adoption of Reform Agendas was rushed with laws adopted through emergency procedures and minimal involvement of civil society. It was a missed opportunity to enable meaningful civil society participation.

The benefits of civil society cooperation strategies were inconsistent and limited, as strategies were in place only in **Montenegro, North Macedonia and Serbia**. Where they had ended, such as in **Albania and Kosovo**, they were not replaced by new strategies that would ensure continuity in civil society co-operation. Where strategies were in place, their implementation was hindered by the lack of budgeted action plans. Moreover, public structures responsible for the implementation of civil society cooperation strategies continued to face challenges similar to previous years, including insufficient human and financial resources, and overreliance on foreign assistance. Meaningful inclusion of CSOs in civil society cooperation councils deteriorated, and was, at times, seen as a window-dressing exercise to tick off EU requirements.

The shrinking civic space and deteriorating, if not hostile, environment took their toll on CSO capacity and resilience. Financial transparency of CSOs has been one such casualty as some CSOs would not publish information on their sources of funding and amounts received in an attempt to mitigate risks of harassment and smear campaigns by avoiding public exposure. While their funding base remained reasonably diversified – slightly over one-half of participating CSOs reported that no single donor type contributed more than 50% of their income – the situation was nevertheless precarious given the unpredictability of short-term donor funding, the shift away from funding civil society by bilateral donors, inconsistent and often politicised public funding, and limited alternative sources of funding. While the EU, foreign private foundations and national authorities remained the most important donors, the proportion of CSOs reporting no donor income doubled to 25% in 2024. They tended to be small organisations, with annual turnovers under EUR 5,000, relying primarily on volunteers and other sources of funding such as membership fees and individual donations.

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