Monitoring Matrix on Enabling Environment for Civil Society Development

Regional Report:
Western Balkan & Turkey
2025

Balkan Civil Society
Development Network

Monitoring Matrix on Enabling Environment for Civil Society Development

Regional Report: Western Balkans and Türkiye 2024

Anja Bosilkova-Antovska, Simona Mladenovska
May 2025

Sida

Balkan Civil Society Development Network

Address: Macedonia Street 43-1/9, 1000 Skopje, Republic of North Macedonia

Phone: +389 2 6144 211

Email: executiveoffice@balkancsd.net

Website: www.balkancsd.net

www.monitoringmatrix.net

Regional Report on the Enabling Environment for Civil Society Development 2024

Publisher: Balkan Civil Society Development Network (BCSDN)

About the publisher: Biljana Spasovska, Executive Director

Authors: Anja Bosilkova-Antovska, Simona Mladenovska

COPYRIGHT An electronic version is available at the BCSDN websites.

This publication was made possible through the financial support of the Swedish International Development and Cooperation Agency (Sida). The contents of this publication are the sole responsibility of BCSDN and do not necessarily reflect the views of Sida.

Contents

List of Abbreviations 6
Acknowledgement 7
Executive summary 9
Introduction 14
Background | Civil Society Overview 15
Findings 20
Area 1: Basic Legal Guarantees of Freedoms 20
1.1. Freedom of association 20
1.2. Related Freedoms 27
Area 2: Framework for CSO Financial Viability and Sustainability 38
2.1. Tax/fiscal treatment for CSOs and donors 38
2.2. State support 41
2.3. Human Capital 46
Area 3: Government-CSO Relationship 50
3.1. Framework and practices for cooperation 50
3.2. Involvement in policy- and decision-making process 54
3.3. Collaboration in social provision 59
Conclusions and recommendations 62
Annexes 64
Monitoring Matrix Framework and Methodology 64

List of Abbreviations

AML	Anti-Money Laundering
ASCS	Agency for Support to Civil Society
BCSDN	Balkan Civil Society Development Network
CFT	Countering the Financing of Terrorism
CSO	Civil Society Organization
CSR	Corporate Social Responsibility
EC	European Commission
EU	European Union
FATF	Financial Action Task Force
GONGO	Government-Organized Non-Governmental Organization
IMC	Independent Media Commission
IPA	Instrument for Pre-Accession Assistance
MM	Monitoring Matrix
MP	Member of Parliament
NCCS	National Council for Civil Society
NCEI	National Council for European Integration
NGO	Non-Governmental Organization
NPO	Non-Profit Organization
OGP	Open Government Partnership
REM	Regulatory Authority for Electronic Media
RS	Republika Srpska
SLAPP	Strategic Lawsuit Against Public Participation
UNDP	United Nations Development Programme
VAT	Value Added Tax
WB	Western Balkans
WBT	Western Balkans and Türkiye

Acknowledgement

BCSDN expresses its deep appreciation to our partners – Partners Albania for Change and Development (Albania), Centar za promociju civilnog društva (CPCD, Bosnia and Herzegovina), Kosovar Civil Society Foundation (KCSF, Kosovo), Center for Development of NGOs (CRNVO, Montenegro), Macedonian Center for International Cooperation (MCIC, North Macedonia), Civic Initiatives (Serbia), and Third Sector Foundation of Türkiye (TÜSEV, Türkiye) – for their invaluable contributions to this report. Conducting the Monitoring Matrix research across the region is a complex and demanding task that depends on the commitment, collaboration, and tireless efforts of all involved, whose teamwork remains key to its success.

Executive summary

In 2024, civil society in the Western Balkans and Türkiye (WBT) continued to operate in a highly diverse and uneven environment, marked by notable disparities between legal guarantees and the reality of implementation. While most countries retained a generally enabling legal framework, persistent shortcomings in institutional practice, political will, and financial infrastructure undermined the sustainability and independence of civil society. Democratic backsliding, hostile narratives, and repressive legal initiatives gained ground in several countries, namely Bosnia & Herzegovina, Serbia and Türkiye, while isolated examples of policy engagement and support mechanisms illustrated the potential for progress when political will and civil society advocacy align.

Across the region, legal guarantees for freedom of association are in place and generally in line with international standards, however the situation in practice is more complicated. Registration procedures are uneven and often burdensome—Albania lacks a functioning electronic system, while laws remain stalled in Montenegro and North Macedonia. AML/CFT obligations are still burdening in most countries, and used to put pressure on CSOs in some, but progress was noted in Kosovo and Montenegro. In Serbia, intensified political pressure has created a chilling effect. Though "foreign agent" laws were not adopted in 2024, narratives delegitimizing foreign-funded CSOs, especially in Türkiye, BiH and Serbia, continue to be used as tools of control.

This report provides a timely and evidence-based assessment of the state of civic freedoms and the environment in which civil society across the Western Balkans and Türkiye operated during 2024, a period marked by intensified democratic backsliding and coordinated attempts to suppress dissent. While this report covers only 2024 developments, 2025 has already seen a further deterioration in several countries—particularly in Serbia and Bosnia and Herzegovina—underscoring that the threats are escalating and urgent to address.

Drawing on over a hundred country-level data points, field research by national experts, verified incident reporting, and civil society consultations coordinated by the Balkan Civil Society Development Network, the analysis reflects both regional trends and country-specific developments. While the research prioritizes accuracy and triangulation of sources, some limitations persist, including incomplete data due to legal opacity and the underreporting of challenges faced by CSOs and activists working informally or in rural areas. This report maintains full editorial independence. Its aim is not only to inform but to offer credible, actionable insights for policymakers, donors, and civic actors committed to reversing civic space erosion in the region.

Freedom of peaceful assembly is generally protected, though Türkiye continues to impose sweeping restrictions and bans, and violations persist in Serbia and BiH. Peaceful environmental and anti-corruption protests in Serbia were met with violence and mass arrests. Freedom of expression is threatened by defamation laws (still criminalized in Republika Srpska (BiH), Serbia, Albania, and Türkiye), SLAPPs, and shrinking media independence. Serbia and Türkiye remain the most restrictive environments. Civic space remains insecure. Activists, particularly from LGBTI+, gender, and environmental groups, face surveillance, harassment, and smear campaigns. Spyware use in Serbia and protest bans in Türkiye mark a deepening trend. Disinformation laws and bans (e.g., Albania's TikTok ban) undermine online rights. In North Macedonia, anti-gender movements are gaining ground, using fearmongering to curtail civil rights discourse.

The financial sustainability of CSOs continued to be a pressing regional concern. While the right to seek funding is legally protected, access remains difficult due to banking restrictions, politicized oversight, and negative rhetoric. Tax frameworks for CSOs remain underdeveloped and fragmented, with VAT exemption procedures still being a major challenge for CSOs in Albania. Tax benefits are poorly implemented or limited to select sectors. Public funding remains scarce, fragmented, and vulnerable to political influence. Philanthropic engagement remains low due to legal ambiguity and lack of incentives. Volunteerism remains poorly regulated, except in Türkiye where CSOs influenced draft frameworks, and North Macedonia introduced civic engagement activities in schools. CSO employment remains unstable due to limited access to benefits and state incentives, such as social security, tax breaks, or maternity leave, while short-term funding and lack of institutional support contribute to the broader structural instability of the sector.

Cooperation between governments and civil society remains inconsistent and generally ineffective across the region. Despite formal inclusion, civic participation in policymaking is weak. Consultations are often symbolic or rushed in most countries. Transparency and access to information are limited, with regression noted in North Macedonia, Kosovo and Albania, while rural CSOs remain excluded from digital engagement platforms. Government-CSO cooperation Councils are inactive or underused in most countries, except Kosovo. Serbia's civil society increasingly withdrew from cooperation mechanisms altogether, viewing participation as tokenistic and devoid of influence.

Overall, civic space continues to shrink amid regulatory inertia, political hostility, and structural barriers. These trends are not isolated—they reflect a strategic attempt to dismantle civic space and democratic pluralism. When protestors are beaten, journalists sued into silence, and activists surveilled or harassed, the space for democratic debate collapses. Inaction risks consolidating authoritarian tendencies and normalizing repression. Policymakers must recognize that civil liberties are being eroded not by dramatic legislation alone, but by bureaucratic suffocation, digital repression, and unchecked political intimidation. To reverse the region's downward trend and rebuild an enabling environment for civil society, urgent action is needed to improve legal certainty, institutional transparency, and sustainable financing, while safeguarding fundamental freedoms as the cornerstone of democratic development.

BEST of 2024

The Financial Intelligence Agency in Albania, in collaboration with civil society, issued guidelines to help NPOs address terrorism financing risks - progress toward a risk-based AML approach welcomed by CSOs.
In BiH, Republika Srpska's draft "foreign agents" law was withdrawn from parliamentary procedure in May 2024 following civil society and international backlash, marking a key pushback against restrictive legislation.
Kosovo's new AML/CFT Law removed CSOs from the list of reporting entities—pending Constitutional Court review—marking a shift toward international standards and potentially reduced banking barriers for CSOs.
By establishing the first state-funded Resource Center for NGO development, the Government of Montenegro has taken a tangible step toward supporting the long-term development and sustainability of civil society.
Mass civic mobilization in Serbia, including anti-corruption and environmental protests, highlighted growing public resistance to repression and deepening democratic backsliding.
CSOs in Türkiye actively participated in the development of a legal framework on volunteering, with most of their opinions and recommendations being addressed.

WORST of 2024

In Kosovo, the government's platform for tracking public funding to NGOs experienced a sharp decline in performance, as key institutions failed to upload data or submitted incomplete/duplicate entries, resulting in nearly €5 million in discrepancies.
State pressure on CSOs in Türkiye working in the fields of gender equality, LGBTI+ rights, ecology, migration, and human rights, especially those receiving foreign funding, increased in 2024, alongside a controversial draft law on "agents of influence" that threatened to criminalize critical voices and activism.
The failure to effectively regulate and implement VAT exemption on foreign funding continues to undermine the financial sustainability of Albania's CSO sector, as the 2023 procedures remain too ambiguous to apply in practice.
In North Macedonia, the rapid adoption of laws without prior public consultation sidelined civil society and undermined participatory policymaking. Despite formal consultation mechanisms, legislation was passed through hastily, sidelining the public.
Montenegro saw intensified scrutiny of foreign-funded CSOs and proposals for foreign agent-style legislation. Although ultimately unsupported, these efforts—paired with declining transparency in public consultations and exclusion of CSOs from policymaking, signaled a troubling shift toward shrinking civic space.
Government officials and pro-government media in Republika Srpska (BiH) continued to label watchdog CSOs and independent media as "foreign mercenaries" or "enemies of the state," exacerbating public mistrust and increasing risks for activists and journalists, while the re-criminalized defamation law created a chilling effect on public discourse.

Key Country Recommendations for Action

Albania:

- Ensure the timely development of the 2024–2027 RoadMap towards an Enabling Environment for Civil Society Development through a transparent and inclusive process that actively involves CSOs and relevant stakeholders from the outset.
- Establish genuine and structured consultation mechanisms with CSOs and strengthen the Partnership Platform for European Integration to ensure transparent, inclusive, and traceable civil society participation in all EU accession chapter discussions and intersectoral working groups, thereby aligning Albania's reform agenda with EU standards and fundamental rights.

Bosnia and Herzegovina:

- Stop the adoption of any foreign agents-style legislation and ensure that future laws on CSO financing and transparency are developed through inclusive consultation processes and aligned with international standards.
- Adopt and implement the national Strategy for enabling environment for civil society, including the harmonization of laws regulating CSOs at different administrative levels.

Kosovo:

- Amend the Law on the Register of Beneficial Owners and finalize the AML law to ensure CSOs are no longer misclassified as high-risk entities, enabling smoother registration, operations, and access to funding, including addressing existing barriers to access banking services.
- Accelerate the adoption of the Concept Document on Volunteering and the Law on Allocation for Use and Exchange of Municipal Immovable Property to establish a supportive legal framework for volunteer engagement and enable equitable CSO access to public assets for community development.

Montenegro:

- Reestablish the Council for cooperation between state authorities and NGOs, ensuring effective involvement of civil society representatives and full implementation of the Strategy on cooperation.
- Ensure full respect for the principles of democracy and legislation on participation of CSOs and the general public in decision-making, especially in cases of high-impact decisions.

North Macedonia:

- Resume the stalled legislative process to amend the main Law on associations and foundations, ensuring inclusive consultation processes with civil society.
- Government and lawmakers should consistently utilize the ENER platform for all draft law consultations to ensure transparency, legal compliance, and inclusive public participation.

Serbia:

- Implement measures to enhance basic freedoms and protect civic actors from harassment, surveillance, attacks, and smear campaigns, that occur equally in the public and online space.
- Develop anti-SLAPP mechanisms to protect journalists, media, and activists from malicious lawsuits, especially through safeguarding existing legal standards that decriminalize defamation.

Türkiye:

- End the use of legal and administrative oversight mechanisms for restricting and criminalizing civil society activities and amend laws and regulations that are not aligned with international standards on fundamental rights and freedom of association.
- Develop a comprehensive strategy and reform program to foster an enabling environment for civil society, ensuring the active participation of CSOs in the process.

Introduction

The Balkan Civil Society Development Network (BCSDN) is pleased to present the eleventh edition of the Monitoring Matrix on Enabling Environment for Civil Society Development, covering developments in the Western Balkans and Türkiye in 2024.

The Regional Report summarizes the findings and recommendations from the country reports covering the six countries in the Western Balkans (Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro, and Serbia) and Türkiye. An interactive web platform offering access to monitoring data per country is available at https://monitoringmatrix.net.

The Monitoring Matrix, developed in 2013 by BCSDN with support of its members and partners, presents the main principles and standards that have been identified as crucial to exist for the environment to be considered enabling for the operations of CSOs. The Matrix is organized around three areas, each divided by sub-areas:

- Basic Legal Guarantees of Freedoms;
- Framework for CSOs' Financial Viability and Sustainability;
- Government – CSO Relationship.

The comprehensive methodology is based on international standards and best regulatory practices at the European Union level and in European countries. The Matrix aims to define the optimum conditions for civil society to function and develop effectively. At the same time, it aims to define a realistic framework that can be followed and implemented by public authorities. Having in mind that the main challenges lay in implementation, over 150 indicators are set to monitor both the existing legal framework and its practical application.

The Monitoring Matrix operates on an annual reporting cycle which ensures a systematic and comparable evaluation across the region and across years, helping stakeholders track progress or regression, identify gaps and emerging trends, and prioritize reforms. The research conducted aims to provide for shadow reporting on the enabling environment for CSDev and to influence EU Enlargement policy and funding support for sustainable and strategic development of the sector.

Background | Civil Society Overview

In 2024, CSOs in the Western Balkans continued to operate in a difficult and shifting political landscape, impacting the rule of law, democratic processes, and access to fundamental rights. All six countries remain classified as hybrid or transitional regimes by Freedom House, oscillating between democratic and autocratic tendencies, with Kosovo the only one showing signs of democratic progress.[1] Election cycles across the region further disrupted institutional functionality and civil society participation, while governance and reform processes slowed.

The EU enlargement process in the Western Balkans advanced in 2024, with Montenegro and Albania making significant progress. Montenegro became the first candidate to receive a positive Interim Benchmark Assessment Report for rule of law chapters, and closed three negotiating chapters by December, at the Intergovernmental Conference in Brussels, marking the first such progress after seven years.[2] However, the lack of final benchmarks ensuring the development of civil society raises concerns.[3] Albania is the first candidate to open two clusters in two months, while Serbia failed to open Cluster 3, due to lack of progress in the rule of law and normalization of relations with Kosovo. North Macedonia's accession process stalled due to Bulgaria's demands for constitutional amendments, leading the EU to decouple it from Albania. Bosnia and Herzegovina, the least prepared candidate, saw its reform progress stall mid-year, delaying the opening of accession negotiations despite initial EU agreement in principle. Kosovo also failed to gain candidate status, leaving its EU membership prospects uncertain.[4]

These developments unfolded as the EU launched the €6 billion Reform & Growth Facility, raising hopes but also concerns about conditionality and implementation.[5] The success of EU initiatives promoting structural reforms, however, relies on the region's governments

---

[1] Freedom House, *Freedom in the World 2024: Democracy deteriorates in the Western Balkans, Serbia faces the strongest decline*, 11 April 2024. https://europeanwesternbalkans.com/2024/04/11/freedom-house-democracy-deteriorates-in-the-western-balkans-serbia-faces-the-strongest-decline

[2] Government of Montenegro, *Montenegro doubles the number of closed chapters: A landmark achievement on the EU path, giving fresh momentum to the enlargement process*, 13 June 2024. https://www.gov.me/en/article/montenegro-doubles-the-number-of-closed-chapters-a-landmark-achievement-on-the-eu-path-giving-fresh-momentum-to-the-enlargement-process

[3] Council of the European Union, *General Approach on the Regulation establishing the Reform and Growth Facility for the Western Balkans*, 21 June 2024. https://data.consilium.europa.eu/doc/document/AD-13-2024-INIT/en/pdf

[4] European Western Balkans, *Renewed EU enlargement momentum and political tensions: Key events in the Western Balkans in 2024*, 28 December 2024. https://europeanwesternbalkans.com/2024/12/28/renewed-eu-enlargement-momentum-and-political-tensions-key-events-in-the-western-balkans-in-2024/#:~:text=The%20process%20of%20EU%20enlargement%20in%20the%20Western,of%20the%20Growth%20Plan%20for%20the%20Western%20Balkans

[5] Balkan Civil Society Development Network, *Beyond the Reports: The Need for Clear Benchmarks to Support Civil Society in Enlargement Countries*, November 2024. https://balkancsd.net/novo/wp-content/uploads/2024/11/127-4-BCSDN-Background-Analysis-2024.pdf

implementing meaningful changes, especially in media freedom and civil society protection. Yet in practice, these freedoms remain under systemic threat across the region, with growing legal and physical attacks on journalists and civic actors – particularly in Serbia, Albania, and Bosnia and Herzegovina – where criminal defamation laws, smear campaigns, and institutional inaction have fostered a climate of fear and impunity.

While legal guarantees exist for civic rights, their enforcement remained weak. Judiciary independence suffered, particularly in Republika Srpska, where institutional defiance against the Constitutional Court deepened the crisis.[6] The undermining of judicial independence and democratic institutions further restricted the public space available for marginalized groups to express their rights and freedoms. Ethnic, LGBTQI+, and gender minorities faced growing hostility, both offline and online. Despite public awareness campaigns, hate speech and violence against LGBTQI+ people rose, and protections remain inadequate. In BiH and Serbia, dating apps were weaponized to target LGBT individuals, with underreporting and weak hate crime protections worsening the issue.[7] Femicide and gender-based violence persisted, especially in BiH, where legal reforms remain insufficient to address the severity of the problem. A year after the live-streamed femicide of Nizama Hecimovic, BiH has made no significant legislative changes to address domestic violence or femicide and protect women's rights despite the persistent advocacy campaigns of civil society.

Governments in the Western Balkans have employed various tactics to suppress critical voices and obstruct the work of CSOs, thus impacting the level of public trust in civic actors. Nevertheless, the resilience of civic actors continues to drive efforts to advance democracy, the rule of law, and fundamental rights. Joint initiatives by CSO coalitions at national and regional levels have enhanced information sharing, strengthened the common voice, and improved advocacy to counter threats to civic space and protect fundamental freedoms.

The resilience of civil society across the Western Balkans was strongly demonstrated in 2024 through grassroots mobilization and public advocacy. In Serbia, mass protests erupted following allegations of electoral manipulation and deepening democratic erosion. Citizen-led initiatives such as Polekol, Sviće, Borba, and Proglas and the student-led blockades and rallies against corruption mobilized thousands, demanding accountability and transparency. Campaigns like "Ferka" and "Dokle više" further energized public participation and voter engagement. These movements not only galvanized domestic pressure but also spurred international advocacy[8], with civil society actors raising concerns before EU institutions, ultimately contributing to a European Parliament resolution on

[6] Ośrodek Studiów Wschodnich (OSW), *Dispute over the justice system in Bosnia and Herzegovina*, 12 February 2024. https://www.osw.waw.pl/en/publikacje/analyses/2024-02-12/dispute-over-justice-system-bosnia-and-herzegovina

[7] Balkan Insight, *Dating-app attacks in Bosnia, Serbia spread fear among LGBT people*, 20 March 2024. https://balkaninsight.com/2024/03/20/dating-app-attacks-in-bosnia-serbia-spread-fear-among-lgbt-people/

[8] Balkan Civil Society Development Network, *Civic Uprising: Resilient Response to Electoral Challenges in Serbia*, https://balkancsd.net/civic-uprising-resilient-response-to-electoral-challenges-in-serbia/

election irregularities[9]. Initiatives supporting activists on the ground, such as legal aid provision through tools like the ŠTIT Activist Card[10], highlighted the coordinated efforts to protect civic actors. These developments reflect how civil society continues to bridge grassroots mobilization with institutional advocacy, asserting a critical role in defending democratic norms and fundamental freedoms in the region.

Elsewhere in the region, national platforms like CIVILKA[11] in Bosnia and Herzegovina advanced civil society legitimacy and cooperation, collective initiatives such as the Declaration of civil society on the opening of negotiations on the membership of Bosnia and Herzegovina in the European Union[12]. Civil society's role in responding to crises was equally visible, as humanitarian CSOs led community support efforts following severe floods, reinforcing solidarity and trust in civic action.[13] These developments reflect how civil society continues to bridge grassroots mobilization with institutional advocacy, asserting a critical role in defending democratic norms and fundamental freedoms in the region.

Despite the mounting pressures, civil society in the Western Balkans continues to play a vital role in defending democratic values and human rights. The year 2024 reaffirmed that even in constrained civic spaces, solidarity, strategic advocacy, and citizen engagement remain powerful tools for change. Sustained international support and meaningful political will—both domestically and from the EU—will be essential to protect these efforts and ensure that civic actors are recognized not as adversaries, but as indispensable partners in building democratic, inclusive, and resilient societies.

[9] European Parliament, "Serbia did not fulfil its commitments to free and fair elections, say MEPs," 2 February 2024, https://www.europarl.europa.eu/news/en/press-room/20240202IPR17327/serbia-did-not-fulfil-its-commitments-to-free-and-fair-elections-say-meps

[10] Civic Initiatives, "Open call for ŠTIT – an activist protection card," January 2025, https://www.gradjanske.org/prijavi-se-za-aktivisticku-karticu-stit/

[11] Civil Society Promotion Centre (CPCD), *Third edition of "Civilka" focuses on representativeness and legitimacy in the civil society sector*, Civilnodrustvo.ba, 9 May 2024, https://civilnodrustvo.ba/treca-civilka-u-fokus-stavila-reprezentativnost-i-legitimnost-u-civilnom-sektoru.

[12] Civil Society Promotion Centre (CPCD), *"Sign the Civil Society Declaration: We Want to Take a Step Further Toward the EU"*, Civilnodrustvo.ba, 16 May 2024, https://civilnodrustvo.ba/potpisite-deklaraciju-civilnog-drustva-zelimo-korak-dalje-ka-eu/.

[13] Balkan Civil Society Development Network, *Solidarity after the Devastating Floods in Bosnia and Herzegovina*, 2024, https://balkancsd.net/bcsdn-solidarity-after-the-devastating-floods-in-bosnia-and-herzegovina/

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Number of registered organizations	13,053	24,725	13,044	7,441	12,684	38,448 associations, 1,121 endowments and foundations	101,388 associations, 6,094 foundations
Main civil society law(s)	Civil Code of Albania. Law No. 8788/2001 "For non-profit organisation". Law No. 8989/2001 "For the registration of non-profit organisation" Law No. 80/2021 "For the registration of non-profit organisations	Laws on Associations and Foundations on state, entity and Brčko District (BD) levels;	Law on Freedom of Association in NGOs	Law on Non-Governmental Organizations	Laws on Associations and Foundations	Law on Associations, Law on Endowments and Foundations	Turkish Civil Code Law on Associations, Law on Foundations, Law on Collection of Aid
Relevant changes in legal frameworks	Draft Law on Volunteering DCM No. 611, date 2.10.2024, "For the Approval of the Roadmap for Functioning of the Democratic Institutions	1. State Law on Prevention of Conflict of Interest 2. Law on Combating Money Laundering and Financing of Terrorism 3. Joint recommendations at the ministerial level on the economic and financial dialogue between the EU and the Western Balkans and Turkey	1. Administrative Instruction on NGO Registration & Deregistration, Regulation on the Complaints Commission for NGOs 2. Law on AML/CFT (pending enactment) 3. Law on the Register of Beneficial Owners 4. Draft Law on Allocation of Municipal Immovable Property (under revision)	No relevant changes in the legal framework were adopted in 2024.	1. Law on Associations and Foundations 2. Law on Civil liability for insult and defamation	No relevant changes in the legal framework were adopted in 2024.	Annulment of certain articles of Law on Associations and Law on Collection of Aid by the Constitutional Court.
State funding*	(approx.968,150 EUR)	approx. 24 mil EUR	approx. 8.78 mil EUR reported vs. 13.65 mil adjusted actual; 4.88 mil EUR verified discrepancy due to errors, duplicates and underreporting, final figure may be higher	approx. 9.3 mil EUR dedicated	approx. 5 mil EUR	Approx. 93 million EUR.	No aggregated data on state funding
Human resources (employees and volunteers)	9,875 employees, of which 8,916 are employed full-time and 959 are part-time employees. No available data on volunteers	2,734 employers in the civil society sector**	5,739 paid contributions continuously for 12 months; 21,544 had contributions paid by CSOs	1,590 employees	1,813 employees No data on volunteers.	7,735 employees in associations, 1,126 employees in endowments and foundations. No data on volunteers.	22,324 employees and 411,945 volunteers in foundations. No data for associations.
CSO-Government Cooperation (relevant body/ consultation mechanism)	National Council for Civil Society, National Council for European Integration, Partnership Platform for European Integration	Advisory Body of Council of Ministers BiH for Cooperation with Civil Society, E-platform for public participation in decision-making on the level of Council of Ministers	Online Platform for Public Consultations, Office of Good Governance, Council for Government – Civil Society Cooperation, Ministry of Local Administration's forum for cooperation with civil society, National Council for EU	Council for Cooperation of state administration and NGOs	Council for Cooperation with Civil Society and Government	Ministry for Human and Minority Rights and Social Dialogue, Council for Creating an Enabling Environment CSDev, Contact points for CSO cooperation, National Convention on the EU	Directorate General for Relations with Civil Society

			Integration				

*The figures provided are official government data for the distribution of funds according to the budget lines for CSOs. However, in most countries, these figures also count funds allocated to other entities such as federations, sports clubs, public service contracts, etc. For more accurate information, please check the detailed country reports.
**There are no available data from the Statistics agencies in BiH or the FIA. This info is gathered through the Statistics Agency of Brčko District, the Ministry of Finance of FBiH, and the Tax Office in RS.

Findings

Area 1: Basic Legal Guarantees of Freedoms

1.1. FREEDOM OF ASSOCIATION

While basic freedoms remain legally protected, systemic barriers—related to registration, transparency of legislative processes, and informal group recognition—continue to hinder the full realization of freedom of association in the region. Legislative processes regarding the main CSO laws in North Macedonia and Montenegro have stalled for over two years. Recent changes in Montenegro have complicated the registration process, while both Kosovo and North Macedonia exhibit unfavourable registration conditions for CSOs compared to businesses. Registration procedures have become a major challenge for CSOs in Albania, as the electronic registration system has not been made functional yet, despite its original deadline being set for the end of 2023. In Serbia, the climate for association has further deteriorated due to intensified government pressure, contributing to a chilling effect on civic organizing.

While direct state interference is less present, attempts to introduce "foreign agent" laws (although none of those were passed into law during 2024), harmful political narratives, and financial exclusion remain key tools of indirect interference, particularly targeting CSOs critical of or misaligned with government policies. Financial and administrative scrutiny intensified under the guise of AML/CFT compliance, disproportionately affecting critical CSOs (e.g. in Serbia). While Kosovo and BiH excluded CSOs from AML obligations in 2024, the amended law in Kosovo has not been enacted by the end of the year, while in BiH law enforcement remained inconsistent.

CSOs' right to seek and use funding is guaranteed by law, but access remains obstructed by discriminatory banking practices, excessive oversight, and politically charged narratives around foreign funding. Social entrepreneurship frameworks have expanded in some countries, but generally face weak implementation. Across the region, CSOs struggle with tax and administrative barriers to fundraising and donation collection. Despite these challenges, CSO resilience remains strong, with continued efforts to advocate, organize, and push back against shrinking civic space.

1.1.1. Establishment of and Participation in CSOs

Across the Western Balkans and Türkiye (WBT), the freedom of association remains generally enshrined in constitutions and protected by legal frameworks that align with international standards. These frameworks typically allow individuals and legal entities to form, operate, and participate in civil society organizations (CSOs) without significant legal obstacles. Most countries continue to have inclusive provisions for establishing associations, foundations, and other forms of non-profits. However, legal inconsistencies in Bosnia and Herzegovina (BiH), where laws are not harmonized across different governance levels, continue to pose challenges.

During 2024, legislative progress on the main CSO laws remained uneven. The long-delayed reform processes in North Macedonia and Montenegro have stalled for over two years. North Macedonia's current framework offers weak legal recognition for public benefit organizations, lacks safeguards against political interference, and fails to support transparency or modern civic engagement – highlighting an urgent need for reform to reflect civil society's evolving realities. In Montenegro, concerns persist due to the opacity of the process and the proposed content, particularly on state funding and restrictions on economic activities by CSOs. In Türkiye, the previously proposed amendments to the legal framework—including both restrictive and positive elements—remain shelved.

In Kosovo, new legal and regulatory measures introduced in 2024 to implement the Law on Freedom of Association raised concerns about their potential impact on the enabling environment. The adoption of an Administrative Instruction on NGO registration and a Regulation establishing a Complaints Commission introduced useful clarifications (e.g. minimum capital for foundations and enforcement of fines for registry delays), but also extended the deadline for NGO-related decisions, including registration and public benefit status, from 30 to 45 days. This extension contrasts with the significantly shorter registration times for businesses (2-7 days) and may unnecessarily slow procedures, despite historically low registration volumes. While the Complaints Commission offers a second-instance appeals mechanism and aims to reduce court involvement, its development lacked meaningful civil society participation, and its final structure remains government-dominated, raising concerns over the impartiality of the mechanism.

While in Kosovo newly registered organizations still reported a smooth and timely process, with an average duration of one to two weeks and clear procedural rules, CSOs in Albania face increasing registration challenges. Despite legal guarantees, the long-delayed electronic registry system – initially expected by end-2023 – remains non-operational, with CSOs waiting an average of 95 days for registration in 2024, far exceeding the 15-day legal deadline. In addition, the process for statutory changes is prolonged from 40 days to two years, with an average of around 150 days in practice. The absence of functioning registers continues to hinder civil society operations, not only in Albania and Bosnia and Herzegovina but also across the region. While there are only few functional registers, for instance in Montenegro, the data available is limited, not up-to-date, and not in open format, lacking interoperability with other datasets which would enable easier analysis and monitoring of the main indicators for development of civil society, and its diversity.

Lack of access to online registration remains an issue in Bosnia and Herzegovina, Türkiye, and North Macedonia. In Türkiye, the registration process begins with the physical submission of documents and is marked by excessive formalism and extensive documentation requirements. However, no registration fee is charged and membership procedures for associations (e.g., membership applications, status inquiries, and withdrawals) can be conducted electronically. In the case of North Macedonia, CSOs must still submit paper forms and pay higher registration fees compared to businesses. Recent changes in registration practices in Montenegro, namely the requirement to define the mandate and recall procedures of assembly members, has resulted in somewhat longer registration times and increased administrative burdens. In BiH, while registration is reportedly simple and mostly completed in due time, some delays are reported due to institutional capacity shortages.

Having the legal possibility to operate without registration, informal and unregistered groups continue to play an essential role across the WBT, especially in advocacy, protests, and public mobilization. However, they face significant limitations, including barriers to funding and policy participation, as seen in Albania and Türkiye, and institutional pressure or police actions, as reported in Serbia and Türkiye. In Serbia, 2024 saw an intensification of state-sponsored attacks against civil society, including smear campaigns, unlawful surveillance, and fabricated cases. New legislative proposals, such as the draft law on foreign agents, have further exacerbated the hostile environment. Informal groups of environmentalists and activists continue to demonstrate the potential of youth-led and grassroots initiatives despite mounting challenges.

CSO networking remains a strong feature of the region. Legal frameworks allow organizations to join both national and international networks. Survey data confirms that many CSOs are members of such networks, which provide critical platforms for capacity building, advocacy, and collaboration. Nonetheless, sustainability issues persist. In Montenegro, many project-based coalitions struggle with long-term viability. Türkiye, despite having hundreds of thousands of registered associations, continues to see only a small fraction of them actively participating in networks or umbrella organizations. In Serbia, the worsening environment for civil society has also negatively impacted CSO networking, with growing fear and fragmentation undermining collective action.

1.1.2. State Interference

Legal frameworks across the WBT generally safeguard the independence of CSOs and prohibit arbitrary state interference in line with international standards, but the practical application remains uneven. Türkiye remains a concern, with multiple laws (e.g., the Penal Code, Law on Associations, Law on Misdemeanours, and Law on Collection of Aid) enabling potential overreach. In North Macedonia, although a working group is revising the Criminal Code, CSO representatives still face liability under provisions that treat them as public officials.

In 2024, selective scrutiny of foreign-funded CSOs intensified in Montenegro, Republika Srpska (BiH), Serbia, and Türkiye reflecting ongoing attempts to introduce foreign agent-style legislation. In RS, the draft Law on the Special Registry and Publicity of Non-Profit Organisations' Work, aimed to impose onerous reporting and compliance requirements on all CSOs receiving foreign funding[14], was fortunately withdrawn from parliamentary procedure in May 2024.[15] In Montenegro, a similar proposal was tabled by the right-wing party in the ruling coalition, but did not get support from the other political parties[16]. Similarly, a Serbian MP's call to restrict foreign funding for CSOs, and a proposal for a Law on Foreign Agents by a satellite party of the ruling coalition in late 2024, reflects ongoing scrutiny in Serbia akin to Russian-style "foreign agents" legislation.[17]

In Türkiye, in October 2024, the government proposed a new article into the Penal Code to expand the definition of "espionage" by introducing the crime of "agents of influence," raising serious concerns among civil society, media, and opposition parties. The article proposed a prison sentence of three to seven years for anyone found guilty of committing a crime against state security or political interests in alignment with the strategic interests or instructions of a foreign state or organization. It was criticized for its vague wording, which risked criminalizing critical voices and foreign-funded CSOs. Following strong public criticism the draft article was withdrawn. However, the government signalled its intention to revise and resubmit the proposal, prompting continued opposition from rights groups, particularly in light of past laws used to suppress dissent. Although none of these initiatives in the four countries passed into law during 2024, they reflect persistent attempts to stigmatize and intimidate CSOs.

Financial and administrative scrutiny continues to disproportionately affect CSOs, particularly in BiH, Serbia, and Türkiye. In Serbia, there is growing concern over misuse of AML frameworks—such as the National Bank reportedly accessing sensitive financial data, potentially leaked to pro-government media. While direct state interference is less visible, CSOs report environments of fear, smear campaigns, and data misuse. In BiH, although no inspections were conducted under the new AML law and CSOs were excluded as obliged entities in March 2024, intimidation persists, particularly in Republika Srpska. Some CSOs there report pressure and threats, with political authorities actively promoting narratives about foreign interference. In Türkiye, the Constitutional Court annulled key provisions of the Law on Associations, including the authority of the Minister of Interior to suspend associations or their leadership. Although two legislative drafts were prepared in response, no new proposals had been submitted to parliament by the end of 2024.

---

[14] Radio Free Europe/Radio Liberty, Republika Srpska Withdraws Draft "Foreign Agents" Law Amid Dodik Criticism, April 2024, https://www.rferl.org/a/republika-srpska-foreign-agents-law-dodik/32890514.html
[15] Radio Free Europe/Radio Liberty, Republika Srpska Moves Ahead With Proposed 'Foreign Agents' Law, May 2024: https://www.rferl.org/a/republika-srpska-foreign-agents-draft-law-withdraw/32967576.html
[16]Vijesti, "Ambasada SAD: 'Zakon o stranim agentima mogao bi da stigmatizuje NVO i omet¬e kritički rad nezavisnih medija'. 12.06.2024: https://www.vijesti.me/vijesti/politika/727885/ambasada-sad-zakon-o-stranim-agentima-mogao-bi-da-stigmatizuje-nvo-i-omete-kriticki-rad-nezavisnih-medija
[17] CRTA, "Foreign Agents" Law Initiative in Serbia – Comparative overview with legislation in Russia, Georgia, and Hungary, 04.12.2024: https://crta.rs/en/foreign-agents-law-serbia-overview/

Obligations linked to anti-money laundering (AML) and countering the financing of terrorism (CFT) continue to burden CSOs across the region. Albania, Kosovo, and North Macedonia maintain classifications that label CSOs as high-risk clients, subjecting them to enhanced due diligence and limiting access to financial services. This persists despite the negligible risk of terrorist financing misuse—illustrated by the case of Albania, where the Financial Intelligence Agency reported only one suspicious financial activity involving an CSO, as well as the findings of the National Risk Assessment confirming the low risk of terrorism-financing in the Albanian non-profit sector – not yet prompting changes to the AML/CFT law. In Montenegro, authorities avoided grey-listing by recognizing CSOs as low-risk and clarifying that beneficial ownership refers to executive directors. In practice, however, there are multiple cases of founders being designated as "shareholders" in equal percentages in CSOs, despite the official clarification.

Positive changes to the AML/CFT regulations were made in Kosovo and BiH. In Kosovo, with the Assembly's approval of the new AML/CFT Law, NGOs were removed from the list of reporting entities – marking a key advocacy success aimed at reducing administrative burdens and aligning Kosovo with international best practices – but its enactment is pending Constitutional Court review due to procedural concerns. Meanwhile, the ongoing sectoral risk assessment for NGOs made progress. Challenges persist with the Law on the Register of Beneficial Owners, which misclassifies CSO founders as beneficial owners, ignoring the distinct governance of non-profit entities, and imposes disproportionate fines. Restrictive cash donation rules also continue to hinder local fundraising, while CSOs have engaged with the Central Bank to improve access to banking services. BiH's 2024 AML law also excluded CSOs as obliged reporting entities[18], though some banks continue to impose de facto restrictions. Moreover, several by-laws required to implement the new law have yet to be adopted, and the Directorate for Inspection Affairs has not conducted any inspections of legal entities under its provisions.

In Serbia, there is growing concern over misuse of AML frameworks—such as the National Bank reportedly accessing sensitive financial data on critical CSOs and individuals, potentially leaked to pro-government media.[19] Still, Türkiye remains one of the most restrictive environments. AML/CFT regulations are applied selectively, with increased audits and bureaucratic hurdles for rights-based organizations and those working with sensitive groups. While Türkiye's FATF grey-listing period intensified these practices, even post-delisting, financial access remains limited. Banks often require extensive documentation, delay fund transfers, and show reluctance to work with CSOs, undermining their financial sustainability.

Sanctions for non-compliance are legally governed and intended to be proportionate, yet enforcement is often inconsistent or politically influenced. In Serbia and Türkiye, critical

[18] Council of Ministers of Bosnia and Herzegovina (19 February 2024) "BiH adopts legislation related to the prevention of money laundering." https://europeanwesternbalkans.com/2024/02/19/bih-adopts-legislation-related-to-the-prevention-of-money-laundering/

[19] Civic Initiatives. (28 October 2024). Civic Initiatives warn that the state, via the National Bank of Serbia, is misusing private citizens' data: https://www.gradjanske.org/gradjanske-inicijative-upozoravaju-drzava-preko-nbs-zloupotrebljava-privatne-podatke-gradjana/

CSOs face frequent inspections and surveillance, with Türkiye seeing a rise in maximum-level penalties—particularly related to foreign aid reporting. CSOs have been fined for technical breaches, such as not reporting payments for international memberships, expert fees, or digital tools. In BiH, 93 inspections were conducted across both entities in 2024, resulting in sanctions against 12 organizations. While sanctions are rare in Montenegro, there are growing calls for stronger oversight. Although dissolution procedures generally meet international standards, practical barriers persist. In BiH, deregistration delays create additional burdens. In Serbia, despite the formal procedure for involuntary termination, broader pressure and targeting of CSOs raise concerns about fair enforcement.

Despite legal protections, CSOs in BiH, Montenegro, Serbia, and Türkiye continue to face varying degrees of harassment, threats, and smear campaigns by state officials. While direct interference is less visible, such practices contribute to an environment of fear and self-censorship. In Türkiye, throughout 2024, such smear campaigns and threats persisted particularly against CSOs working in the fields of gender equality, LGBTI+ rights, ecology, migration, and human rights, especially those receiving foreign funding. In addition to state actors, pro-government media outlets and business actors have also been involved in these targeted defamation and intimidation efforts. In BiH, the president of Republika Srpska and public officials publicly called out CSO representatives, putting them on the front. Contrarywise, Albania, Kosovo, and to some extent North Macedonia, report that CSOs operated without direct state interference during 2023 and 2024. In Kosovo, 2024 marked a year of progress, with no reported incidents of state intrusion in CSO affairs. However, across the region, AML/CFT frameworks, politicized narratives, and financial exclusion continue to be misused as tools of indirect interference—disproportionately targeting CSOs that are critical of or not aligned with government policies.

1.1.3. Seeking and Securing Financial Resources

Across the region, laws allow CSOs to seek and secure financial resources from domestic and foreign sources, including grants, donations, and income-generating activities. However, the practical application of these rights remains inconsistent and often hindered by administrative burdens, discriminatory banking practices, and political hostility.

WBT CSOs are permitted to engage in economic activities aligned with their statutory goals, though under restrictive conditions. In Bosnia and Herzegovina, legal fragmentation persists; CSOs in FBiH must establish a separate legal entity for economic activities, while in Republika Srpska this only applies to unrelated activities. In Albania and Montenegro, CSOs can engage in economic activities within a defined income threshold. Proceeds above that level result in remittance to the state budget in the case of Montenegro, and registration of the CSO in the VAT scheme in Albania. Due to complex compliance demands, relatively few CSOs in BiH and Montenegro pursue such activities. In Serbia, reporting burdens are significant, and in Türkiye, a lack of a supportive tax and financial framework continues to limit the viability of economic enterprises as income sources.

Social entrepreneurship remains an emerging tool for sustainability. Serbia and Republika Srpska maintain advanced legal frameworks, while North Macedonia, Kosovo, and Montenegro are advancing via strategies or laws. In Kosovo, a full legal framework has already been adopted, including the Law on Social Enterprises and five secondary legal acts, while in FBiH a working group to draft a social entrepreneurship law was established. However, implementation challenges, vague regulations, and limited incentives continue to hinder sector growth, especially in Albania, Montenegro, and North Macedonia. Even in Serbia, social enterprises face challenges competing for public contracts.

While foreign funding is legally permitted, in practice it remains politically sensitive. In Serbia and Türkiye, CSOs receiving such funds are frequent targets of smear campaigns. The proposed "foreign agents" laws in several countries reflect the hostile narrative. Although these proposals were not enacted, they reinforce an environment of distrust. In Türkiye, sustained pressure on foreign-funded CSOs in recent years has led many international donors to withdraw or adopt a more cautious approach. This environment has also contributed to an overall decline in the resources allocated to civil society.

Banking access remains one of the most pressing challenges. In Serbia, banks are reportedly reluctant to open accounts for CSOs, particularly in smaller towns, citing lack of instructions from central authorities or labelling CSOs as "high risk." This stems from legal uncertainty around AML implementation and escalating negative narratives. In BiH, the lack of oversight from banking agencies in both FBiH and RS leaves discriminatory and non-transparent bank practices unaddressed, despite evidence of restrictions. In Kosovo, informal dialogue was initiated with the Central Bank to address structural barriers to banking access and financial services; however, no follow-up or concrete developments occurred beyond this initial exchange. CSOs across Albania, North Macedonia, and Türkiye also report persistent issues, including difficulties opening accounts, accessing credit due to perceived financial risk, and processing international transactions. In North Macedonia, delayed reforms such as the Law on Donations and Sponsorships and the Law on Group Financing continue to hinder more innovative fundraising approaches like crowdfunding.

Procedural burdens complicate access to individual donations across the region. In BiH, CSOs face taxes, platform fees, and unclear rules for online fundraising. CSOs in Kosovo face informal banking barriers and de-risking practices, which hinder access to online donation tools. In Albania, however, an upward trend in private donations was observed, with approximately 50% more donations recorded than the previous year. In North Macedonia, complex VAT exemption procedures for donations still delay fund access, while in Montenegro waiting periods were drastically cut after the Tax Authority set up an effective system for processing VAT returns for EU projects, taking over the procedure from the Ministry of foreign affairs. Serbia continues to offer limited tax incentives—mostly for corporate, not individual, donors. In Türkiye, restrictive legislation such as the Law on Collection of Aid, coupled with burdensome authorization requirements, severely obstruct fundraising activities. The lack of a clear legal distinction between the terms of "aid" and "donation" perpetuates difficulties, while ongoing legal and administrative restrictions and ambiguities hinder the receipt, collection, and utilization of funds. Obtaining permission to collect aid remains notably challenging.

1.2. Related Freedoms

Western Balkan countries generally maintain rights-based legal frameworks for peaceful assembly, with the only change in 2024 being the new Law on Public Gatherings in Kosovo. Restrictions remain in Türkiye, as authorities retain extensive powers to ban or disrupt protests, often with little justification. Spontaneous assemblies are largely recognized in law, except in Serbia, and digital assemblies remain unregulated. In practice, assemblies proceed without interference in most countries, but serious violations occurred in Serbia, BiH, and Türkiye. Protests in Serbia against corruption and environmental damage were met with mass arrests and police brutality. In BiH, particularly in Republika Srpska, politically motivated bans and restrictions persisted. Türkiye imposed broad protest bans and cracked down on peaceful demonstrators during Pride and Women's Day events.

Freedom of expression is formally protected across the region, but in practice faces growing restrictions. Criminal defamation remains in place in Serbia, RS, Albania, and Türkiye. In RS, over 130 criminal charges for defamation were filed in under a year. Governments and pro-government actors increasingly use smear campaigns, SLAPPs, and legal threats to silence dissent. Media freedom continues to deteriorate, especially in Serbia, BiH, and Türkiye, where arrests, censorship, and surveillance persist. While some positive legal steps were taken (e.g., Albania's anti-SLAPP pledge, journalist protection in North Macedonia), implementation is weak. Kosovo's 2024 media law (annulled in by the Constitutional Court in 2025) sparked widespread concern over potential increased government oversight over media, while Republika Srpska's draft media law risks excluding CSOs from public communication roles.

Civic space remains insecure in much of the region. Threats, harassment, surveillance, and smear campaigns targeted journalists, CSOs, and activists—particularly those defending gender, LGBTQI+, environmental, or minority rights. Serbia and Türkiye stood out for state-enabled hostility, including spyware use, online defamation, and forced deportations. Digital rights are inconsistently protected, with unjustified surveillance and government control persisting, especially in Türkiye and Serbia. Albania's TikTok ban, RS's proposed disinformation laws, and intensified anti-gender movements in North Macedonia further undermined civic space and freedom of expression.

1.2.1. Freedom of Peaceful Assembly

All countries in the region maintain legal provisions safeguarding the right to peaceful assembly, aligning broadly with international standards. Albania, Kosovo, and Serbia's legal frameworks are noted for their adherence to international human rights conventions, while North Macedonia and Montenegro include certain geographic or participant-based restrictions, like proximity limits in Montenegro near government buildings, or necessary approval for foreign nationals to participate in public assemblies in North Macedonia. The law in North Macedonia also imposes significant responsibilities on organizers, including high fines if any damages occur during the assembly. Türkiye's legal framework grants broad powers to authorities, enabling vague and frequent bans on spontaneous or recurring protests. In all the countries spontaneous and counter-assemblies are recognized, except in Serbia where the law lacks specific provisions for counter-assemblies, contributing to potential ambiguity in practical applications. Online or digitally-mediated assemblies are not recognized in legislation, bearing an inherent risk of restrictive interpretation of the general rules of assemblies, privacy and data protection[20].

Generally, prior notification rather than authorization is the norm, though requirements vary. Although authorization is not legally required in Türkiye, notification is enforced as such in practice, with authorities often issuing unjustified bans and penalizing foreign nationals, including through deportation, for participating without prior approval. In Kosovo, the 2023 Law on Public Gatherings introduced clearer definitions and extended the notification deadline from 72 to 96 hours – a change intended to support better planning and safety by state authorities, despite no concerns with the shorter timeframe reported previously. Montenegro and BiH typically require five days' notice. BiH's legal landscape remains fragmented, with recent legislative updates in two cantons. The Brčko District continues to uphold high standards, while in Republika Srpska (RS), authorities prohibited several gatherings. In RS, the law also allows for appeals, but in practice, access to effective remedies is more limited, especially when restrictions are politically motivated. The draft Law on NGOs raises additional concerns about potential suppression of organizing activities without adequate remedies.

In practice, freedom of assembly remains relatively protected as peaceful gatherings in most countries proceed largely without interference, except for BiH, Serbia and Türkiye. Most serious violations to the freedom of peaceful assembly have targeted environmental activists, ethnic minorities, or political opposition, reporting detentions, targeted intimidation, including revealing personal information of protesters, and, in some cases, physical confrontations with law enforcement.

In BiH, particularly in RS, authorities cancelled peace campaign events and imposed restrictions on assemblies, often under the guise of maintaining public order. Instances included the cancellation of events organized by activists like Srđan Puhalo and the health

[20] Macedonian Young Lawyers Association (MYLA). Digitally Mediated Assemblies. Skopje: MYLA, December 2022: https://myla.org.mk/wp-content/uploads/2023/01/DIGITALY-MEDIATED-ASSEMBLIES-en-FINAL-web.pdf?fbclid=IwAR2QtSp_0O2C-9IkPc4hngOn3Q_JbfLFVy1X7vLmM4b0ypp4wwPlcnh9O4Q

workers' union in Sarajevo Canton, which was denied permission to hold a protest that would disrupt traffic. BiH Pride faced renewed pressure in 2024, as police demanded organizers submit a security plan—despite being responsible for protester safety. Pride organizers also won a lawsuit against RS police over attacks during the 2023 march. Conversely, the Brčko District demonstrated a more permissive approach, with no reported bans or interruptions of assemblies in 2024.

In Serbia, while the 'Serbia Against Violence' protests[21] continued into 2024, the largest demonstrations were triggered by the controversial Rio Tinto lithium mining project[22] and the tragic collapse of the Novi Sad train station canopy, which killed 16 people[23]. Both events exposed entrenched government corruption and repression. Environmental activists opposing the mining project faced intimidation, police brutality, and arbitrary detentions.[24] The Novi Sad tragedy, linked to corruption in infrastructure development, ignited widespread outrage, culminating in one of Belgrade's largest rallies as tens of thousands demanded justice, transparency, and resignations.[25] Protesters across both movements faced mass arrests often carried out by plainclothes officers without identification, while protesters were charged with the most serious criminal offenses. A total of 47 cases of detention were recorded in relation to environmental protests and 48 arrests in the last two months of 2024 during the anti-corruption protests. Protesters were subject to verbal insults, intimidation, and violence from pro-government groups,[26] underscoring Serbia's deepening democratic backsliding and intolerance for dissent. Yet, in a rare show of cross-sector solidarity, the student-led protests catalyzed public pushback, including from parts of the judiciary, against authoritarian tendencies, despite the hostile climate marked by smear campaigns and state intimidation.

Albania also witnessed significant unrest in the last year. In October, violent anti-government protest erupted in Tirana with opposition supporters clashing with police, throwing Molotov cocktails at government buildings, and demanding a caretaker government amid accusations of authoritarianism and rising political tensions.[27] In Türkiye, the prohibition of pre-notified protests and the disproportionate use of force by

[21] Euractiv, Thousands protest fraud in Serbia vote, put hope in European Parliament debate, 10 April 2024: https://www.euractiv.com/section/enlargement-neighbourhood/news/thousands-protest-fraud-in-serbia-vote-put-hope-in-european-parliament-debate/
[22] Reuters, Serbia's green activists rally against Rio Tinto lithium project, 28 June 2024: https://www.reuters.com/markets/commodities/serbias-green-activists-rally-against-rio-tinto-lithium-project-2024-06-28/
[23] Oslobođenje, Video: Peaceful Protest of Sarajevo Students in Front of the Serbian Embassy in Sarajevo, 2024: https://www.oslobodjenje.ba/vijesti/bih/video-mirni-protest-sarajevskih-studenata-ispred-ambasade-srbije-u-sarajevu-1008898/
[24] Civic Initiatives, , Stop the Targeting of Environmental Activists, 2024: https://www.gradjanske.org/zaustaviti-targetiranje-ekoloskih-aktivista-kinja/
[25] Euronews, Serbian students rally against government, refute claims of Western funding, 13 December 2024: https://www.euronews.com/my-europe/2024/12/13/serbian-students-rally-against-government-refute-claims-of-western-funding
[26] AP News, "Serbia roof collapse in Novi Sad sparks protests, arrests," 30 May 2024: https://apnews.com/article/serbia-roof-collapse-protest-arrests-novi-sad-e37f02c507072a0262ecce053dec1798
[27] Balkan Insight, Albanian anti-government protesters throw Molotov cocktails in clashes with police," 7 October 2024: https://balkaninsight.com/2024/10/07/albanian-anti-govt-protesters-throw-molotov-cocktails-clash-with-police/

law enforcement against demonstrators have become common practices. In many provinces and districts, long-term bans on all protests and events have been imposed, lasting up to 30 days for various stated reasons. Ban decisions in Türkiye are often issued last-minute, making legal appeals ineffective and preventing protests from proceeding. Regardless of bans, peaceful demonstrators, especially at events like Women's Day, Pride, or opposition rallies, face harsh police crackdowns, with widespread reports of torture, ill-treatment, and mass arrests.

Law enforcement responses varied across the region. In Serbia, police actions during protests were marked by excessive force, including the use of tear gas and mass arrests. In BiH, reports indicated instances of excessive force, such as during agricultural protests in Orašje. In contrast, Albania, Kosovo, Montenegro, and North Macedonia generally reported peaceful facilitation of assemblies, with isolated incidents of force used against violent groups in Kosovo's northern municipalities.

Media and observer access to assemblies remained a concern in Türkiye, Serbia, and RS. Journalists faced threats, harassment, and obstruction, undermining press freedom. In Türkiye there are numerous instances where journalists have been obstructed from reporting on protests, thereby infringing on press freedom and the public's right to access information. This obstruction is further exacerbated by arrests and detention orders targeting journalists. The European Centre for Press and Media Freedom highlighted a decline in media freedom in BiH, citing restrictive laws and political pressure. In contrast, Albania, Kosovo, Montenegro, and North Macedonia generally ensured unhindered media access to public gatherings.

1.2.2. Freedom of Expression

Freedom of expression is constitutionally guaranteed across the Western Balkans and Türkiye, supported by media laws and civil liability provisions. Kosovo, North Macedonia, and Montenegro have decriminalized defamation, aligning with European standards. Kosovo's legislation, for instance, protects "reasonable publication" on matters of public interest, reinforcing the media's role as a public watchdog. However, in Serbia, insult remains a criminal offense, and in Republika Srpska (RS) and Albania, defamation is criminalized, though Albania does not impose prison sentences.

In Türkiye, laws criminalize both insult and defamation, with harsher penalties applied when directed at public officials. Numerous cases involve charges such as "insulting the President," "denigrating the symbols of state sovereignty," and "insulting the Turkish Nation, the State of the Republic of Türkiye, and its institutions and organs," often resulting in imprisonment. With the enactment of the so-called "Disinformation Law," amending the Penal Code and the Press Law, challenges to expressing critical opinions and diverse viewpoints have increased, including many lawsuits filed on grounds of this regulation, limiting the ability of the press and CSOs to inform the public of human rights violations.

Few legal changes have taken place during 2024. In North Macedonia, the amendments of the Law on Audio and Audiovisual Media Services lifted the moratorium on state advertising on private media, a practice that was suspended in 2017 and banned by law in 2018. The amendments adopted state that there is no longer a legal obstacle for central and municipal authorities to advertise on private broadcasters, sparking worries about potential corruption and undue influence.[28] Conversely, legal amendments to the Criminal Code now equate attacks on journalists with assaults on public officials, aiming to enhance journalist protection. In Albania, the Parliament established a Special Disinformation Committee to combat foreign interference and disinformation, but civil society warned that its external focus risks overlooking domestic misinformation and could threaten freedom of expression without proper safeguards.[29]

In Serbia, the 2024 election process for the Council of the Regulatory Authority for Electronic Media (REM) was marred by procedural flaws, with nearly half of the candidates and proposers failing to meet legal criteria.[30] The Committee on Culture and Information ignored these irregularities, while the Ministry of Culture and Information issued a legally unfounded, politically motivated opinion. Kosovo adopted a new Law on the Independent Media Commission (IMC) in March 2024 to reform audiovisual media regulation, but it was annulled by the Constitutional Court in April 2025 following strong criticism. Journalists and civil society raised concerns about its impact on media freedom, especially a provision requiring registration of online media platforms, and enabling the IMC to impose regulatory sanctions for violations.[31] Though it did not directly target CSOs, it was expected to affect media-focused organizations; the Court's full decision is still pending publication. In Republika Srpska, concerns have been raised about the lack of transparency in the legislative process regarding the media law set up to enter parliamentary procedure in the first quarter of 2025. These concerns include proposals to exclude CSOs involved in media projects and those operating portals as media outlets, a move that could further jeopardize independent journalism and media freedoms.

In practice, freedom of expression faces systemic threats across the region, particularly in Serbia, Bosnia and Herzegovina, and Albania. In RS, the re-criminalization of defamation in July 2023 has led to a significant chilling effect on free speech. By mid-2024, over 130 criminal defamation charges had been filed under the contentious law, primarily targeting journalists and media workers, facing accusations ranging from harming personal reputations to publishing sensitive materials. Only one investigation order has been issued

[28] Balcanicaucaso, North Macedonia: Media and Public Funds, 24 June 2024: https://www.balcanicaucaso.org/eng/Areas/North-Macedonia/North-Macedonia-media-and-public-funds-230548
[29] SciDev.Net, SciDev statement regarding the Special Parliamentary Committee on Disinformation, 5 April 2024 https://scidevcenter.org/2024/04/05/scidev-statement-regarding-the-special-parliamentary-committee-on-disinformation/
[30] Civic Initiatives, Report on the REM Election Process, May 2025: https://www.gradjanske.org/wp-content/uploads/2025/05/Izvestaj_o_REM_izborima_Azurirano_Gradjanske_inicijative.pdf
[31] ECPMF, Kosovo's Media Law Enables Political Capture of Media Regulatory Body, 2024: https://www.ecpmf.eu/kosovos-media-law-enables-political-capture-of-media-regulatory-body/

despite 30 criminal defamation charges, and no indictments have been made.[32] This legal framework enables the misuse of legal mechanisms to silence dissent and suppress critical journalism, posing a serious threat to freedom of expression.[33]

Across the Western Balkans, RSF's 2024 World Press Freedom Index shows significant backsliding: Serbia troubles the most amid escalating harassment of independent media[34], while Albania, Bosnia and Herzegovina, North Macedonia, Montenegro, and Kosovo all exhibit similarly declining rankings[35]. In Türkiye, press freedom remains in the "very serious" category, positioned at 158th out of 180 in RSF's 2024 report, characterized by state control, prosecutions of journalists, and censorship[36]. These assessments underscore persistent threats to media freedom and freedom of expression throughout the region.

Attacks towards journalists are increasingly threatening media freedom. In North Macedonia, a journalist was detained and allegedly assaulted by police while covering a football match, sparking outrage among media freedom organizations.[37] Despite improved detection of perpetrators, investigations into attacks on journalists and activists remain sluggish and ineffective, with no indictments issued, perpetuating a climate of impunity.[38] The European Commission's 2024 report highlighted that journalists in North Macedonia continue to face criticism and smear campaigns from politicians and public figures. In Albania, political pressure continues to compromise press independence[39], with officials threatening journalists over critical reporting and smear campaigns targeting media professionals, including intimidation against women journalists.[40] In Kosovo, MPs sparked backlash after sharing an unverified article accusing two outlets of Serbian influence. The Kosovo Journalists Association (AGK) condemned the posts as a dangerous campaign, warning they could endanger journalists and escalate tensions.[41] Attacks

---

[32] Balcanicaucaso, BiH Republika Srpska Reintroduces the Crime of Defamation, Balkan Insight, 2024: https://www.balcanicaucaso.org/eng/Areas/Bosnia-Herzegovina/BiH-Republika-Srpska-reintroduces-the-crime-of-defamation-226384

[33] Front Line Defenders, Human rights journalist faces defamation lawsuit for exposing corruption, 5 November 2024: https://www.frontlinedefenders.org/en/case/human-rights-journalist-faces-defamation-lawsuit-exposing-corruption

[34] The Guardian, Press freedom in Serbia is facing a dangerous turning point, warn editors, 23 March 2025: https://www.theguardian.com/world/2025/mar/23/press-freedom-in-serbia-is-facing-a-dangerous-turning-point-warn-editors?

[35] Balkan Insight, RSF report: media freedom tumbling in most Balkan countries, 2 May 2025, https://balkaninsight.com/2025/05/02/rsf-report-media-freedom-tumbling-in-most-balkan-countries/

[36] RSF, Türkiye: Ten years of state hostility towards the press under President Erdoğan. Retrieved from, 2024: https://rsf.org/en/t%C3%BCrkiye-ten-years-state-hostility-towards-press-under-president-erdogan

[37] European Federation of Journalists, North Macedonia: We urge authorities to cease harassment of journalist Furkan Saliu, 10 May 2024: https://europeanjournalists.org/blog/2024/05/10/north-macedonia-we-urge-authorities-to-cease-harassment-of-journalist-furkan-saliu/

[38] MIA, ZNM calls for urgent resolution of proceedings for violence against journalists, 24 April 2024: https://mia.mk/story/znm-calls-for-urgent-resolution-of-proceedings-for-violence-against-journalists

[39] SafeJournalists.net, SafeJournalists' concerns over decision made by Albanian Supreme Court regarding case of journalist Elton Qyno, 19 March 2024: https://safejournalists.net/portfolios/safejournalists-concerns-over-decision-made-by-albanian-supreme-court-regarding-case-of-journalist-elton-qyno/?fbclid=IwAR3kaBJwW8mUOVT8qAa3MZ0_nHmrXua4yvpXDClzbWV_HDA8eTBqvAyy5IM_aem_AQ5TpPtvjc6SH_ySeBGKjZWAZCL9y0Muq_yLJx1nzOeFzDjQ1Tq55C4nYa0KIDO_fbs

[40] Balkan Insight, "Albanian PM's intimidation of woman journalist condemned", 19 March 2024: https://balkaninsight.com/2024/03/19/albanian-pms-intimidation-of-woman-journalist-condemned/

[41] Kosovo Journalists' Association, "Dangerous campaign against media," 22 July, 2024: https://agk-ks.org/en/cases/fushate-e-rrezikshme-ndaj-medieve-prishtine-22.07.2024

against journalists persist in Montenegro, with the latest attack coming from a businessman connected to political elites[42].

Online harassment of journalists remains a significant issue, particularly in Albania[43] and North Macedonia, with women journalists facing heightened hate speech and threats on social media [44]. In Bosnia and Herzegovina, independent journalism continues to be challenged by ongoing pressures, cyberattacks on media outlets and organizations, and direct threats targeting journalists. These patterns of hostility undermine freedom of media and expression, emphasizing the need for accountability and media workers' protection across the region.

Strategic lawsuits against public participation (SLAPPs) remain a pervasive issue across the region, intensifying in Serbia, where CSOs, activists, and journalists face increased legal pressures. [45] Investigative outlet KRIK and its journalists have been targeted [46] with lawsuits demanding financial damages, criminal penalties, and occupational bans for their reporting on judicial transparency, threatening their livelihoods and fostering self-censorship.[47] In response, a national anti-SLAPP coalition was formed, and the first SLAPPs Contest for the Western Balkans was organized in November 2024[48] to highlight and counteract these practices.

Albania has taken a concrete step to advance systematic and effective SLAPP prevention by committing to adopt legal amendments aligned with the recently adopted EU Anti-SLAPP Directive[49] (February 2024), as well as Council of Europe and Venice Commission standards. These reforms are expected to be completed by June 2027 through structured

[42] Vijesti, Attack on Ana Raičković and Her Son: Verbally Abused, Dragged, Beaten and Choked, 1 July 2025: https://www.vijesti.me/vijesti/crna-hronika/732248/napad-na-anu-raickovic-i-njenog-sina-vrijedjali-cupali-udarali-i-gusili

[43] Media Asia Pacific Monitoring, Concern Over Targeted Notices to Civic Actors in Malaysia, 13 June 2024: https://www.mapmf.org/alert/32036

[44] Safe Journalists, Urgent Call to Address Online Threats Against Lepa Džundeva and Other Journalists in North Macedonia, 2024: https://safejournalists.net/alert/safejournalists-urgent-call-to-address-online-threats-against-lepa-dzundeva-and-other-journalists-in-north-macedonia/

[45] Balkan Civil Society Development Network, 2024 EU Enlargement Package Released: BCSDN's In Depth Analysis on Key Civil Society Findings for Western Balkans, 2024: https://balkancsd.net/2024-eu-enlargement-package-released-bcsdns-in-depth-analysis-on-key-civil-society-findings-for-western-balkans-coming-soon-2

[46] Oštro, Bojana Pavlović: "When everyone finds you agreeable, it means you're not doing this job properly", 2024: https://www.portal-ostro.hr/hr/price/bojana-pavlovic-kada-ste-svima-pozeljni-znaci-da-ne-radite-ovaj-posao-kako-treba

[47] Cenzolovka, Will you make it, Verica?, 2024: https://www.cenzolovka.rs/pritisci-i-napadi/hoces-li-se-izboriti-verice/

[48] Balkan Fund for Democracy, The winners of the first Western Balkans SLAPP Contest in the spotlight, 2024 https://balkanfund.org/regional-cooperation/the-winners-of-the-first-western-balkans-slapp-contest-in-the-spotlight

[49] European Parliament and Council, Directive (EU) 2024/1069 of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation'), 2024. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401069

and inclusive dialogue with media and civil society.[50] Nevertheless, the use of SLAPPs in Albania has been on the rise, with 73 cases reported to date[51], signaling an urgent need for legal and institutional safeguards.

To address this growing trend, BCSDN conducted the region's first comprehensive research on SLAPPs, highlighting the need for early detection, legal frameworks, and better protections for civil society actors. [52] The absence of anti-SLAPP judicial mechanisms, such as early-dismissal protections, places activists and media at a disadvantage, often leading to prolonged litigation that consumes resources and fosters a climate of intimidation. A promising step forward is the proposed law in the Federation of Bosnia and Herzegovina, which includes anti-SLAPP provisions to dismiss baseless lawsuits early and protect activists and journalists engaged in public debates. The draft law has passed the House of Representatives and is currently waiting for voting in the House of People of Federation BiH.[53]

1.2.3. Open, Safe and Secure Civic Spaces

The Western Balkans' and Türkiye's legal and practical landscape for maintaining an open, secure, and safe civic space—both online and offline—reflects a complex blend of progress and persistent challenges. While constitutional protections for freedoms of assembly, expression, and access to information online exist across the region, implementation often falls short, particularly in safeguarding journalists, activists, and CSO representatives from harassment, threats, or violence.

In Kosovo, laws provide a strong legal framework – particularly against defamation and insult – offering individuals a basis for acting on public interest issues. However, there are no government mechanisms specifically in place to protect CSO representatives. Although no attacks on activists were officially documented in 2023 or 2024, the authorities' effective response to harassment against journalists suggests similar action could be expected in cases involving civil society. Montenegro and Albania also criminalize harassment under their penal codes, yet broader protections for CSO representatives remain lacking. Serbia continues to lack legal categories or protections for human rights defenders, and state practices signal growing repression. In North Macedonia, a positive

[50] Official Gazette of Albania, Decision No. 621, dated 10.10.2024 on the approval of the policy document "National Reform Agenda 2024–2027", within the framework of the European Union instrument "Reform and Growth Facility for the Western Balkans", Official Gazette 198/2024, Available at: https://qbz.gov.al/share/2JGelQYcTH-1hZJ34UeMdw

[51] Center Science and Innovation for Development (SCiDEV), Initial Assessment of Albania's Legal Framework for Harmonizing the Anti-SLAPP (Strategic Lawsuits Against Public Participation) Directive, Working paper, 2024: https://scidevcenter.org/wp-content/uploads/2024/10/Working-paper_Initial_Assessment_Anti_SLAPP_AL_SCiDEV.pdf

[52] Balkan Civil Society Development Network, From Silence to Strength: BCSDN's report on SLAPPs in the Western Balkans, 2024: https://balkancsd.net/from-silence-to-strength-bcsdns-report-on-slapps-in-the-western-balkans-is-out-now/

[53] Balkan Civil Society Development Network, New law in FBiH strengthens citizens' and activists' rights, 2024: https://balkancsd.net/new-law-in-fbih-strengthens-citizens-and-activist-rights-2/

development in 2024 was the adoption of amendments to the Law on Free Legal Aid, improving alignment with the Law on Expertise and ensuring better access to justice.

Civic actors across the region have faced diverse pressures throughout 2024. In Kosovo, online smear campaigns have targeted individuals critical of the government, condemned widely by civil society.[54] In BiH and Serbia, government-affiliated actors continue to foster intimidation and reinforce impunity for attacks. Notably, the Sigurna Zona initiative in BiH was launched to support CSOs' protection, but incidents like the hacker attacks against media organizations and individuals such as Buka and Vanja Stokić remain unresolved, with no timely investigation or prosecution. Human rights activists in Serbia have also been detained and subjected to prolonged inspections at the borders, signalling targeted harassment of activist.[55] On one occasion, foreign civic activists were ordered to leave the country, being accused of posing a threat to national security. [56] In addition, the "Mirëdita, Dobar Dan" festival, promoting cultural exchange between Serbia and Kosovo, was banned by Serbian police citing security concerns and potential threats from right-wing activists.[57] Organizers accused authorities of failing to protect participants from nationalist groups, who reportedly intimidated attendees and obstructed the event venue.[58]

Serbia has seen particularly severe attacks on the civic space. Smear campaigns led by top officials, along with the live broadcast of CSO financial data, have intensified political hostility. Public broadcasters failed to report on major anti-government protests, while tabloid media orchestrated campaigns to discredit critical voices. This state-enabled environment continues to stigmatize CSOs, especially those working on sensitive issues such as LGBTQI+ rights, women's rights, anti-racism, and migrants' rights.[59] Similarly, in Montenegro, certain government members have engaged in public verbal attacks against CSOs, contributing to the foreign agents' narrative that stigmatizes critical civic actors.

There have been worrying instances of attacks against civil society actors in Türkiye. Online smear campaigns targeting journalists, women's rights defenders, and LGBTI+ activists have continued, sometimes escalating into legal proceedings. A notable example in the civil society sphere is the closure case initiated against the Tarlabaşı Community Support Center Association, which has been ongoing throughout 2024 as a result of a

---

[54] Balkan Insight, Smear Campaign Against Critics of Kosovo Ruling Party Condemned, 13 March 2024: https://balkaninsight.com/2024/03/13/smear-campaign-against-critics-of-kosovo-ruling-party-condemned

[55] Balkan Insight, Serbia Urged to Stop Illegally Detaining Activists on Borders, 2 September 2024: https://balkaninsight.com/2024/09/02/serbia-urged-to-stop-illegally-detain-activists-on-borders/

[56] European Western Balkans, Foreign Civic Activists Interrogated and Banned from Serbia for Representing a Security Risk, 22 January 2025: https://europeanwesternbalkans.com/2025/01/22/foreign-civic-activists-interrogated-and-banned-from-serbia-for-representing-a-security-risk/

[57] Associated Press, Serbia Bans Kosovo Culture Festival, Citing Security Risk Amid Tensions, 25 May 2024: https://apnews.com/article/serbia-kosovo-festival-banned-mirdita-dobar-dan-e148ca76fb7021ea10f85498065026a6

[58] The Guardian, Belgrade Authorities Cancel Ethnic Bridge-Building Arts Festival After Nationalist Protests, 28 June 2024: https://www.theguardian.com/culture/article/2024/jun/28/belgrade-authorities-cancel-ethnic-bridge-building-arts-festival-after-nationalist-protests

[59] Balkan Civil Society Development Network, Foreign Agents Laws vs Dynamic Accountability: How CSOs Can Defend Civic Space, 2024: https://balkancsd.net/foreign-agents-laws-vs-dynamic-accountability-how-csos-can-defend-civic-space/

coordinated smear campaign. Although one of the two closure cases filed on different legal grounds was dismissed in 2024, the case, brought under claims of legal and ethical violations but essentially targeting the association and its work, continued throughout the year, alongside persistent online smear campaigns.

Digital freedoms across the region remain uneven and cybersecurity remains a regional concern. Kosovo, Montenegro, and Albania have made progress in cybersecurity policy. Kosovo's amended Criminal Code introduced a chapter on Cyber Crimes, including hate speech online, and Albania passed the Law "On Cybersecurity" to strengthen the protection of critical digital infrastructure and later joined the European Centre of Excellence for Countering Hybrid Threats.[60] In practice, however, Albania's online environment was increasingly affected by disinformation and cyber threats. Despite efforts by media monitors and civil society, resilient disinformation networks continued spreading false narratives and smear campaigns, largely undeterred by fact-checking.[61] This eroded public trust and underscored the need for stronger institutional responses.

Unjustified surveillance and monitoring concerns persist, particularly in Serbia, where Amnesty International reported that state authorities have used spyware against journalists and opposition activists. Amnesty International reported that Serbia's secret service and police have been spying on journalists and activists by installing sophisticated spyware on their mobile phones.[62] This has raised serious concerns about state control and repression directed against civil society.[63]

In BiH, the Sarajevo Canton drafted a law treating the internet as a public space and proposing fines for spreading false news that could cause panic or disrupt public order[64]—ultimately withdrawn due to civil society and international criticism. Republika Srpska also proposed similar restrictions but withdrew them amid backlash. Meanwhile, in Albania, the government announced a one-year TikTok ban[65], set to begin in 2025. Ostensibly linked to

---

[60] Center Science and Innovation for Development (SCiDEV), SCiDEV Welcomes Albania's Membership in the European Centre of Excellence for Countering Hybrid Threats (Hybrid CoE), 14 September 2024 https://scidevcenter.org/2024/09/14/scidev-welcomes-albanias-membership-in-the-european-centre-of-excellence-for-countering-hybrid-threats-hybrid-coe/

[61] National Cyber Security Authority of Albania (NCSA), 2024 *"Global Cyber Policies Dialogues: Western Balkans – Meeting Summary"*. Available at: https://static1.squarespace.com/static/5ca0ec9b809d8e4c67c27b3a/t/67bcb7dac417180ef4682dbf/1740421083936/Meeting+Summary+Western+Balkans+Cyber+Policy+Dialogue+Nov+2024+Final_web.pdf

[62] Amnesty International Security Lab, Serbia: A Digital Prison – Spyware and Cellebrite Used on Journalists and Activists, 12 December 2024: https://securitylab.amnesty.org/latest/2024/12/serbia-a-digital-prison-spyware-and-cellebrite-used-on-journalists-and-activists/

[63] European Digital Rights (EDRi), Serbian Authorities Must Prosecute Illegal Hacking of Journalists and Activists, 2024: https://edri.org/our-work/serbian-authorities-must-prosecute-illegal-hacking-of-journalists-and-activists/?fbclid=IwZXh0bgNhZW0CMTEAAR1bp-bBlmVgNjdWBybI5B1PveS3zv1_b7OVuytfO9-gakfzqgP2f2xyzHQ_aem_HE-k7nTfj3maCvIl2ajtRg

[64] Transparency International Bosnia and Herzegovina, TI BiH: The New Law in Sarajevo Canton is a Continuation of the Attack on Freedom of Expression in BiH, 2024: https://ti-bih.org/ti-bih-the-new-law-in-sarajevo-canton-is-a-continuation-of-the-attack-on-freedom-of-expression-in-bih/?lang=en

[65] Politico, Teen's Murder Drives Albania to Ban TikTok for One Year, 2024: https://www.politico.eu/article/teens-murder-drives-albania-ban-tiktok-one-year-edi-rama-stabbing-violence/?utm_source=Facebook&utm_medium=social&fbclid=IwY2xjawHWJ7xleHRuA2FIbQIxMQABHe4uRcb7j-HOBgsEOuxH23LX8j-aVHdH6hEjwcjyhB9gK4Kf_EEm0tgYqg_aem_LKynH9ftmCJrq58X4eWOHg

public safety concerns, the move has been criticized for lacking transparency[66] and for potentially silencing political opposition during election season[67]. Türkiye continues to impose extensive digital restrictions. Numerous websites have been blocked, social media content removed, and user accounts suspended at government request, reinforcing a digital environment that curtails dissent and hinders civil society.

In North Macedonia, anti-gender movements have gained prominence by opposing gender- sensitive education reforms and LGBTQI+ rights.[68] These groups, often supported by religious institutions, utilize disinformation and fearmongering to influence public opinion, portraying gender equality initiatives as threats to traditional family values.[69] Their tactics include organizing protests, disseminating misleading narratives, and pressuring institutions to retract support for gender-related topics. This environment has led to increased harassment of human rights activists and a chilling effect on discussions about gender and sexuality in the public sphere.

[66] Center Science and Innovation for Development (SCiDEV), SCiDEV's Statement Regarding the Decision to Block Access to TikTok in Albania for One Year, 23 December 2024: https://scidevcenter.org/2024/12/23/scidevs-statement-regarding-the-decision-to-block-access-to-tiktok-in-albania-for-one-year/

[67] European Correspondent, Child Safety or Censorship? Albania's TikTok Ban Raises Concerns, 2024: https://www.europeancorrespondent.com/r/child-safety-or-censorship-albanias-tiktok-ban-raises-concerns

[68] Heinrich Böll Stiftung, Anti-Gender Mobilizations in North Macedonia: A Transnational Tool Kit for Domestic Actors Against Equality, 19 April 2024: https://ba.boell.org/en/2024/04/19/anti-gender-mobilizations-north-macedonia-transnational-tool-kit-domestic-actors-against

[69] Meta.mk, When Medical Students Apologize: The Impact of the Anti-Gender Movement in the Public Sphere, 2024: https://meta.mk/en/when-medical-students-apologize-the-impact-of-the-anti-gender-movement-in-the-public-sphere

Area 2: Framework for CSO Financial Viability and Sustainability

2.1. Tax/Fiscal Treatment for CSOs and Donors

Tax frameworks for CSOs across the Western Balkans and Türkiye remain underdeveloped, with no significant reforms introduced in 2024. While basic exemptions for grants and donations exist in all countries, implementation is uneven and hampered by administrative burdens, unclear procedures, and hidden costs. In North Macedonia, tax-related reforms remain stalled due to delays in amending the Law on Associations and Foundations, while in Albania, the VAT exemption system remains unworkable in practice despite legal provisions. Despite formal provisions, tax-related procedures remain complex and inaccessible in practice, with few improvements reported across the region.

Tax incentives for CSOs engaged in economic activities are technically available but remain largely unused due to unclear regulations, low thresholds, and burdensome compliance requirements. In several countries, benefits apply only to public benefit organizations or are limited to narrow public interest categories, excluding key CSO activities. Endowment frameworks continue to be weak or non-functional, with legal gaps and high capital requirements deterring long-term financial planning. Even in countries with existing provisions, such as Serbia, uptake remains low due to structural and procedural obstacles.

Individual and corporate giving remains poorly incentivized. Legal frameworks are in place in most countries, but benefits are limited in scope, difficult to access, or exclude key areas such as human rights or anti-corruption. Deduction caps vary significantly, while administrative complexity and a lack of clarity discourage potential donors. Despite some isolated efforts to promote cross-sector cooperation, broader philanthropic engagement remains hindered by legal ambiguity, fragmented strategies, and the absence of strong institutional support. Overall, tax and fiscal measures across the region continue to fall short of supporting a sustainable environment for civil society development.

2.1.1. Tax benefits

In 2024, tax frameworks for CSOs across the Western Balkans and Türkiye remain limited and uneven, with no significant legal reforms reported. While basic tax exemptions for grants and donations exist in all countries, implementation is inconsistent, and CSOs continue to face administrative burdens, unclear procedures, and indirect costs that reduce the practical impact of these benefits. No progress has been made in North Macedonia, where tax-related reforms remain stalled due to delays in amending the Law on Associations and Foundations. Similarly, other countries have not introduced legal changes, and most developments mirror those reported in previous years.

VAT procedures continue to pose a major challenge for CSOs in Albania. Despite legal obligations and the formalization of VAT exemption rules in 2023, the system remains unworkable in practice. CSOs must notarize contracts with each supplier – often dozens per project – creating a costly and time-consuming process. In practice, the VAT exemption on foreign grants has never been implemented. Even the few certificates issued to CSOs were not utilized, as the system did not support their practical application. Meanwhile, VAT reimbursement under the IPA II Programme has continued, with four reimbursements processed in 2024. Civil society has demanded reforms, and authorities have pledged to revise procedures in 2025.

Tax benefits for CSOs engaging in economic activity are technically available across the region but remain underutilized due to unclear guidance and complex regulations. In Kosovo, benefits are limited to Public Benefit Organizations, but economic activities remain rare: 87.1% of CSOs reported no such activity in 2024. Albania exempts from VAT CSOs' activities in the interest of public good, only in case certain conditions are fulfilled, but the scope is too narrow to reflect the full range of public benefit purposes. In BiH and North Macedonia, income caps on exempted activities make economic sustainability difficult. Türkiye requires CSOs to establish separate economic entities, which are taxed as commercial businesses, removing the intended benefit. While Serbia provides tax-free treatment for donations, membership fees, and some passive income, CSOs still face indirect financial barriers, including high bank charges on international transfers.

Endowment frameworks remain weak across the region. In BiH, the repeal of the prior law on endowments has left the sector without clear procedures or guidance, and the Ministry of Justice has refused to provide clarifications. Serbia is the only country with relatively functional endowment rules and exemptions on passive income, though high capital requirements deter broader uptake. Elsewhere, legal gaps hinder investment income and long-term financial planning for CSOs.

Despite formal exemptions, CSOs report that tax benefits in practice are undermined by indirect taxation, administrative complexity, and lack of institutional support. In Kosovo, most CSOs find tax incentives ineffective due to burdensome accounting rules. In Serbia and BiH, hidden costs—such as inflated bank fees—diminish the value of grants. Overall,

poor enforcement, lack of harmonized tax and CSO laws, and weak institutional capacity continue to restrict the real impact of tax reliefs on the sector's financial sustainability.

2.1.2 Incentives for individual and corporate giving

Individual and corporate giving across the Western Balkans and Türkiye remains underdeveloped and poorly incentivized. While legal frameworks for donations contributions exist in most countries, they provide limited benefits, particularly for individual donors. Serbia and Albania continue to lack any legal tax incentives for individual donations, with Albania also offering only marginal incentives for corporate giving. Despite this, Albania has seen increased collaboration between CSOs and businesses, with 56% of surveyed NPOs reporting partnerships with the private sector. Additionally, crowdfunding is not regulated but remains legally permissible, allowing NPOs to raise funds online without prior state approval. In North Macedonia, the Law on Donations and Sponsorships in Public Activities remains the core instrument for regulating philanthropic giving. Although a draft amendment was submitted for consultation in early 2024, aiming to simplify procedures and broaden deductible activities, no new incentives have been adopted to date. Reform progress is slow, and existing tax benefits have yet to meaningfully boost private or corporate support for civic initiatives.

Corporate tax deductions are generally available across the region but vary in scope and effectiveness. Kosovo offers up to 10% deductions for donations to publicly beneficial activities, while Montenegro caps them at 3.5%. Bosnia and Herzegovina offers around 3% but suffers from procedural confusion and misalignment between its two entities, the Federation and Republika Srpska. Albania and Serbia maintain a 3% and 5% cap, but the incentives are narrowly applied to sectors like health and education, excluding areas such as human rights or anti-corruption. In Türkiye, tax benefits apply only to donations made to associations and foundations with specific status, yet less than 1% of all such organizations hold that status. The current deduction cap of 5% (or 10% in priority regions) does little to foster a culture of giving. Administrative complexity further discourages philanthropic contributions. Many countries require burdensome documentation or pre-approvals to claim deductions, which can deter both donors and CSOs. For example, in BiH, individual donors often need to consult tax offices to clarify eligibility, while in Montenegro and North Macedonia, CSOs face intricate validation procedures. In Türkiye, although procedures for donors are clearer, individuals unable to file income tax returns are excluded from any deductions, severely limiting accessibility.

Efforts to promote structured cross-sector cooperation remain fragmented. North Macedonia and Kosovo have adopted some CSR strategies involving CSOs or being led by CSOs, but these initiatives are rarely, if ever, formal or coordinated at the national level. In Serbia, interaction between the private and civil sectors typically occurs through isolated mechanisms such as the Philanthropy Council, without a unified policy. Without stronger policy backing and administrative reform, the philanthropic environment in the region remains constrained by legal, procedural, and practical limitations.

2.2. STATE SUPPORT

Legal and policy frameworks for state support to civil society remain fragmented and underdeveloped across the Western Balkans and Türkiye. In 2024, no improvements were recorded in laws or strategic documents regulating public funding for CSOs, with reform processes either stalled or completely absent in most countries. Funding allocations remain inconsistent and poorly defined, often blended with unrelated expenditure categories such as sports or religious groups, which undermines transparency and makes it difficult to assess the actual level of support to CSOs. Comprehensive and standardized national funding mechanisms remain rare, and CSO participation in funding cycles is still largely absent or symbolic.

Distribution of public funds remains marred by widespread politicization, lack of transparency, and discretionary practices. Despite the existence of formal procedures in some contexts, implementation is often compromised by favouritism, unclear selection criteria, and the diversion of funds to politically aligned or phantom organizations. Albania and Kosovo saw setbacks in transparency during 2024, with incomplete or non-functional online reporting systems, while in Serbia, allegations of large-scale misuse of funds remain unresolved. Isolated examples of more structured approaches, such as the launch of programmatic funding in Montenegro, represent steps forward but have yet to meaningfully address existing imbalances in access and accountability.

Monitoring and evaluation mechanisms remain weak and reactive, with most countries lacking structured oversight systems or impact assessments. Sanctions for misuse are rarely applied in practice, and oversight is often triggered only by public pressure or media exposure. Non-financial support is permitted by law in most countries but is unequally distributed, frequently subject to political influence, and lacks clear criteria or standardized procedures. While Albania shows relatively more structured practices in allocating public property and confiscated assets, the broader region continues to fall short in creating reliable, transparent, and equitable systems of state support for civil society.

2.2.1. Availability of public funding

In most countries, the existence of laws or national policies specifically dedicated to public funding for CSOs is either inconsistent or incomplete. In 2024, no improvements were observed in the legal and policy frameworks governing public funding for CSOs. In Bosnia and Herzegovina, the draft law on NGO financing in the Federation (FBiH) continued to face criticism for being developed in a non-transparent manner, overlapping with existing legislation. The absence of a comprehensive state-level policy continues to hinder the systematic planning and allocation of public funds. Similarly, in North Macedonia, reforms to improve the legal and financial framework for civil society are in a complete standstill, despite it being one of the Government's strategic commitments since 2020. In Serbia and Türkiye there is still no comprehensive document regulating state support.

In terms of budget planning, funding for CSOs is either inconsistently allocated or blended with other unrelated expenditure categories, making it challenging to discern the actual amount dedicated to civil society. For instance, although in North Macedonia there is a stipulated budget line for CSOs, other entities – such as sports clubs, religious organizations, or even political parties – are allowed to benefit under the same budget line. Similarly, in Kosovo, although some CSO-related funding is planned separately, most allocations are made through general Subsidies and Transfers lines, which also include funding to sports organizations, businesses and individuals. This blending adds confusion and limits financial transparency. In Albania the annual state budget includes an allocation for civil society, which is managed by the Agency for the Support of Civil Society (ASCS) but also covers the agency's own operational costs. As a result, it is difficult to clearly distinguish the amount specifically allocated for financial support to CSOs. According to the law, state funding for the ASCS should increase by 2% annually; however, for 2024, the budget saw only a 1% increase.

A standardized, national-level distribution mechanism is notably absent across the region, except in Albania, and decentralized approaches and sectoral frameworks are prevailing. State support In Macedonia remains minimal—around 4% of CSO revenue compared to the Government's strategic goal of 30%—and institutional support or co-financing of EU-funded projects is virtually absent. Montenegro is the only country where there is a legally stipulated percentage of 0.5% of the state budget that should be allocated to CSOs. While in previous years allocations often fell below this threshold, in 2024 the allocation was at 0.67%. In Kosovo, for the first time, the Ministry of Culture, Youth and Sports introduced a promising model of core, long-term support by launching a three-year funding scheme aimed at the organizational and programmatic development of NGOs in the field of art, culture and cultural heritage. In Türkiye, the lack of a comprehensive public funding mechanism leads to selective support, favoring CSOs aligned with government policies while neglecting the sector's broader and diverse needs.

Legal frameworks across the region generally allow but rarely require CSO participation in public funding cycles, leading to low levels of inclusion. North Macedonia offers a stark example of institutional backsliding: the Council for Government Communication with Civil Society has become effectively inactive, and CSOs are excluded from priority setting

and selection processes, despite the formal adoption of the Code of Good Practices. In Serbia and BiH, consultations are infrequent or superficial, and funding priorities are typically set behind closed doors. By contrast, Kosovo presents a more inclusive model. While planning consultations remain limited, public calls for selecting CSO representatives to evaluation committees were organized at the central level in 2024, though consistent application at the local level remains uncertain. These representatives hold equal decision-making power, offering a rare example of embedded civil society participation in the evaluation phase. Still, across the region, the ability of CSOs to shape funding priorities remains minimal, weakening the alignment of funds with community needs.

2.2.2. Distribution and Transparency of Public funding

The existence and enforcement of legally binding procedures for distributing public funds to CSOs varies significantly across the region. In practice, the distribution of public funds is marred by a problematic lack of transparency and accountability. Political influence and favoritism remain pervasive across the region, undermining the integrity of public funding systems. In BiH, Montenegro and Serbia, politically-aligned or phantom organizations benefiting from public funds have raised alarms. In North Macedonia and Kosovo, on the other hand, a significant portion of the state funds has been directed to sports associations[70], as well as for services or other transfers, blurred within the broader transfer lines dedicated to non-governmental organizations.

In BiH, although a new Law on the Prevention of Conflict of Interest was adopted in March 2024 with stricter asset disclosure rules and prohibitions for public officials, its implementation has been poor. Ministries continue to allocate funds through discretionary procedures, often to politically affiliated or GONGO-type organizations. In Montenegro, funding often flows to generalist organizations that apply across all sectors, while specialized CSOs are sidelined, reinforcing distrust in institutions and deepening funding inequities. A notable shift came in 2024 with the introduction of the first state-funded Resource Centre for NGOs in the region, and its first call for program-based (not project-based) funding in Montenegro. Set to run in 2025–2026, it marks the introduction of a multi-year programmatic approach and represents a step toward more structured support, though its impact on addressing existing imbalances remains to be seen.

In Serbia, CSOs have filed a criminal complaint regarding the misuse of millions of euros from public tenders by the Ministry of Family Care and Demography over a year ago,[71] but no charges have been made yet despite evidence of misuse. According to the watchdog

[70] Macedonian Center for International Cooperation (MCIC), Funding of civil society organisations from municipal budgets mostly focused on sports associations, 2024: https://mcms.mk/mk/vesti-i-javnost/vesti/2586-finansiranjeto-na-gragjanskite-organizacii-od-opshtinskite-budzheti-najmnogu-fokusirano-na-sportskite-zdruzhenija.html?fbclid=IwY2xjawE0Cy9leHRuA2FlbQIxMAABHXiN-VPl94VUbouM55vrKws6wKtC0mCcsTR-gpf-B8mLZYU7ofodimOSrQ_aem_ntb_1VzywUGXNtvQlKSFeg

[71] Civic Initiatives, One year of nothing: millions in abuses through public calls remain invisible to the prosecution, 2024: https://www.gradjanske.org/godinu-dana-nicega-milionske-zloupotrebe-na-javnim-konkursima-nevidljive-za-tuzilastvo/

coalition "Open about Tenders," while there has been a rise in funding allocations, these disproportionately benefit a select few organizations—some lacking transparency, expertise, or public visibility. Concerns include favoritism, mismanagement, and the absence of proper oversight, which undermine the equitable and effective use of public resources.[72]. A long-promised central database on public calls remains unrealized and concerns continue over hidden allocations and unclear selection criteria.

Transparency regressed in both Albania and Kosovo in 2024. In Albania, the Agency for the Support of Civil Society (ASCS) failed to publish the list of funded projects, sharing only aggregate figures without disclosing beneficiaries or project aims. While municipalities applying the ReLOaD methodology demonstrated better practices, national-level institutions fell short. The full functionality of the online platform for monitoring ASCS grants is expected by the end of 2025, as outlined in the newly adopted Roadmap for Functioning of Democratic Institutions. In Kosovo, the reliability of the government's online platform for reporting NGO funding declined significantly: several institutions failed to submit data, others uploaded duplicate or incomplete records, and discrepancies of €4.88 million (out of the €8.78 million officially reported as allocation to NGOs in 2024) were recorded. No government body has taken responsibility for data accuracy, and the Office of Good Governance has yet to establish an effective quality control mechanism. Across the region, countries continue to struggle with the lack of accessible, comprehensive, and centralized information on public funding allocations, discretionary practices, and disaggregated data, making it difficult to assess how public funds are used.

2.2.3. Accountability, M&E of public funding

Monitoring and evaluation of public funds remain fragmented and largely reactive across the region. In BiH, ministries and municipalities often lack capacity to follow up on projects, and sanctions for misuse are rare or symbolic, such as disqualifying CSOs from applying the following year. In most countries, prescribed sanctions exist in law, but in practice they are rarely applied or proportionally enacted, diminishing the effectiveness of deterrence against misuse. North Macedonia has not improved its oversight systems, and though laws require financial reporting, there is no tailored accountability framework for CSOs, nor are misuse cases consistently followed up. In Montenegro, oversight is sporadic and often occurs late in the funding cycle. Serbia and Türkiye only initiate monitoring in response to allegations, and no systemic evaluations of the effectiveness of public funding exist. In contrast, Kosovo leads in this area, conducting at least one site visit per funded project and maintaining a public database on disbursements—despite technical disruptions in late 2023 and early 2024. Albania also performs narrative and financial monitoring through ASCS but has not made impact evaluations publicly available.

[72] Civic Initiatives, How the authorities spend citizens' money through public calls: funds granted to associations of relatives and friends, 2024: https://www.gradjanske.org/kako-vlast-trosi-novac-gradjana-na-konkursima-sredstva-za-udruzenja-rodbine-i-prijatelja/

The lack of consistent, transparent monitoring continues to erode public trust and contributes to inefficiencies and potential misuse of funds. Comprehensive evaluations are absent in most countries, and evaluations are mostly internal processes, with limited visibility into the impact of public funding and no routine publication of results.

2.2.4. Non-financial support to CSOs

Legal frameworks for non-financial support (public property, equipment, logistical support, training, etc.) are in place in most countries, but implementation remains uneven and opaque. No legislative changes took place in 2024, even in Kosovo, where long-awaited legislation on the allocation of municipal immovable property remains stalled. Although a new draft law passed first reading, it limited use to economic purposes, thus excluding purposes related to social or public benefit, and risking institutionalization of practices that could enable the misuse of public property for political or commercial gain. Following civil society advocacy, the process was paused and a working group formed to revise the draft. Despite significant progress, the end of the legislative term delayed its adoption. This legislation is crucial for ensuring equal treatment of CSOs in accessing public property, considering that in practice this support has been largely allocated to businesses rather than CSOs.

In practice, non-financial support is often limited in scale and lacks structured support, while favoritism and uneven treatment are concerns throughout the region. In BiH, non-financial support is mainly a municipal-level issue. Most ministries report having no resources to provide such support. Criteria are unclear, processes are opaque, and CSOs are rarely involved in planning. Similarly, in North Macedonia, CSOs may access government-owned property, but criteria are vague and inconsistently applied. The Law on Local Self-Government permits property transfers, but the prioritization of auctions by municipalities may reduce available support. Since Türkiye has no regulation in place to ensure the transparent and objective allocation of in-kind supports, its distribution without public monitoring and the absence of objective criteria in determining the supported CSOs results in unequal provision of in-kind support under the political influence.

Albania remains the most structured example. Legal frameworks allow for the allocation of confiscated assets to NPOs. In 2024, 16 municipalities provided non-financial support, including rent-free premises, cultural space, and staff support. However, this is mostly done through informal channels or local arrangements, with little standardization. A step forward was taken with the adoption of the “National Reform Agenda 2024–2027, which stipulates that by the end of 2026, around 50% of the number and value of confiscated assets should be reused, including for social purposes, within six months of confiscation. This offers potential new avenues for structured, public benefit-oriented non-financial support to CSOs. Overall, while legal frameworks exist across the region, most countries fall short in creating a reliable and transparent system of state support. Political influence, administrative burdens, inconsistent implementation, and poor oversight continue to undermine the credibility and effectiveness of public funding and support mechanisms for civil society.

2.3. Human Capital

Legal frameworks across the Western Balkans and Türkiye generally treat CSOs on par with other employers, but in practice, nonprofit employment remains constrained by structural and institutional barriers. CSOs face limited access to state employment incentives, with schemes often designed for the private sector and poorly adapted to project-based work. Data collection on CSO employment remains fragmented, with only a few countries publishing partial figures. Employment instability, limited credit access for CSO staff, and weak inclusion in labor-related benefits continue to affect the sector's sustainability. Discussions on labor rights, such as establishing civil sector unions in Bosnia and Herzegovina, are ongoing.

Legal environments for volunteering vary widely, with some countries lacking comprehensive frameworks and others imposing excessive administrative burdens. Albania is advancing draft legal reforms, though concerns persist over vague definitions and punitive provisions, while legislative reforms are still pending in Kosovo and Montenegro. Registration and reporting procedures remain complex in Serbia and Montenegro, while implementation gaps in BiH and Türkiye continue to hinder volunteer engagement. To address this in Türkiye, CSOs actively participated, and their proposals were addressed, in the development of a legal framework on volunteering.

Civic education is broadly recognized in legal frameworks but poorly implemented in practice. While some countries include civic learning in formal curricula, opportunities for meaningful engagement with CSOs remain sporadic and unstructured. A notable step forward was taken in North Macedonia in 2024, with the introduction of mandatory socially beneficial student activities.

2.3.1. Employment in CSOs

Labor laws in the region generally treat CSOs equally with other employers, without sector-specific limitations on hiring, social security, or worker rights. However, practical challenges persist. CSOs often face difficulties accessing state employment incentives, which are designed with for-profit entities in mind and rarely tailored to the project-based and short-term nature of nonprofit employment. In Bosnia and Herzegovina, only a small percentage of CSOs benefit from employment support programs. Kosovo CSOs report limited participation due to low awareness or perceived relevance, while Montenegro offers a positive example through a vocational training program that engaged 166 graduates in CSOs in 2024.

In Albania, amendments to the Labor Code (Law No. 91/2024) introduced more flexible and inclusive labor policies, including extended annual leave and improved paid leave, applicable to CSO employees as well. Still, access to credit and long-term benefits remains an issue across the region, particularly for staff employed under time-limited grants. In North Macedonia, CSOs continue to face unequal access to employment-related benefits, such as those provided under the Law on the Employment of Disabled Persons, and lack representation in employer unions, limiting their negotiation power.

Employment data collection in the CSO sector remains fragmented. Serbia publishes annually the sum number of employees in the sector, while related data from the social insurance registry are not made public. Albania also collects data, though CSO employment showed a slight decline in 2024. In contrast, BiH and Kosovo lack centralized employment records, with available data scattered across tax and pension institutions. In Türkiye, the only publicly available data as of mid-2024 covers foundation employees (22,324), with no figures for associations.

Additional challenges include financial institutions perceiving CSOs as “risky” employers, affecting employees' access to credit, particularly in BiH. The reliance on project-based work makes it difficult to provide benefits like maternity leave in Kosovo. Türkiye’s limited enabling infrastructure and economic instability further constrain long-term CSO employment. While some tax benefits for employing people with disabilities exist—such as in Republika Srpska and Montenegro—data gaps and inconsistent implementation reduce their practical value.

2.3.2. Volunteering in CSOs

Volunteering is formally regulated in several WB countries, but legal frameworks remain outdated, inconsistently implemented, or overly burdensome. Albania, Kosovo, and Montenegro have been developing policies to better support volunteer engagement. In Albania, a draft Law on Volunteering was launched for public consultation in late 2024 after long-standing civil society advocacy. While aiming to improve the environment for volunteering, civil society raised concerns over vague definitions, excessive centralization, and punitive provisions that risk treating volunteering as employment. Key recommendations, including redefining volunteering as a public service (separate from

employment that creates tax and insurance obligations), simplifying registration, and ensuring proportionate administrative measures, were submitted to the Ministry for further review.

Türkiye lacks a comprehensive legal framework for volunteering, but in 2024, a UNDP-EU-supported project led to the publication of a Green and White Paper with policy and legal recommendations to advance volunteerism. In Kosovo, despite extensive input from CSOs and EU-backed technical support, the long-awaited Concept Document on Volunteering has yet to be adopted or translated into law. This has delayed much-needed legal clarity and support mechanisms. Montenegro's Youth Strategy (2023–2027) pledges the creation of a volunteer registry and school-based initiatives, with legislative changes still pending.

While spontaneous volunteer activities are generally tolerated, in countries like Serbia and Montenegro they remain overregulated, with excessive administrative burdens discouraging engagement. In BiH, procedures are unclear and fragmented, with no national strategy or systematic data collection. North Macedonia remains a relative exception, offering tax-free reimbursements for volunteer-related costs and incentives for hosting interns. However, in most countries, incentives and structured programs remain rare, and awareness among CSOs is limited.

Formal registration of volunteers is required in several countries but is often complex and inconsistently enforced. Serbia and Montenegro require volunteer workbooks and impose bureaucratic processes, particularly burdensome for smaller CSOs. Kosovo's centralized online platform offers a more user-friendly model for volunteer management, although broader legal reforms are needed. Across the region, a lack of reliable data on volunteer contributions hinders understanding of the sector's impact and limits the development of effective support policies.

2.3.3. Civic engagement and education

While legislation broadly supports civic education, implementation remains uneven and often disconnected from active civic engagement. Countries like Serbia, Montenegro, and BiH recognize civic education in national laws and strategies, with Serbia's Adult Education Law and BiH's curriculum reforms emphasizing civic competencies. However, these commitments are often not matched by systemic implementation or consistent updates.

Civic education is integrated into school curricula to varying degrees. In BiH and Albania, it is more robust and typically mandatory, while in Montenegro and Serbia it remains optional, limiting its impact. Kosovo introduces civic education in middle school but lacks a systemic approach across all levels. North Macedonia's legal framework supports civic learning, yet practical links to non-formal education and CSO involvement are weak. A notable development, however, was that the Macedonian Ministry of Education and the Bureau for Development of Education, in 2024, for the first time, introduced a program requiring students in grades seven to nine to participate in socially beneficial activities for

a total of 30 hours annually.[73] These activities aim to cultivate students' sense of community, social responsibility, and empathy. This policy may signal a shift toward more structured civic engagement practices, particularly if linked to partnerships with civil society and local governments.

Opportunities for direct civic engagement within education systems are sporadic. In most countries, engagement with CSOs relies on ad hoc extracurricular activities or localized initiatives rather than being embedded in formal curricula. BiH allows CSO involvement in schools, but decisions are left to individual ministries, leading to inconsistent practices. Similarly, in Serbia, Montenegro, Kosovo, and North Macedonia, only a few higher education institutions or local programs offer structured partnerships with civil society.

Recent findings from a Konrad-Adenauer-Stiftung (KAS) report[74] show that in Albania, while youth engagement in formal politics remains low, participation in community and charitable initiatives is high, indicating strong social cohesion and civic interest outside institutional channels. Nevertheless, across the region, the lack of data and limited integration of CSOs into education systems continue to hinder a full understanding and development of civic engagement through education.

[73] Ministry of Education and Science of North Macedonia, The Ministry of Education and Science continues to support youth policies and youth participation in decision-making processes, 2024: https://mon.gov.mk/content/?id=8882

[74] Konrad Adenaure Stiftung, 2024, "Politic and Civic Participation of Youth, Has Municipality". Available at: https://www.kas.de/documents/271859/0/Youth+participation+HAS.pdf/917ead2e-3b57-3afb-8d0e-65278e13b1f5?version=1.0&t=1723626275813

Area 3: State-CSO Relationship

3.1. Frameworks and Practices for Cooperation

Strategic frameworks for civil society development and cooperation exist across the Western Balkans, but their implementation remains weak, underfunded, and largely disconnected from policy practice. While most countries maintain formal strategies or action plans, these are often developed without meaningful consultation and are rarely accompanied by effective monitoring or evaluation mechanisms. In Türkiye, no legally binding strategic document exists, despite the publication of a draft Civil Society Strategy Document in 2022, which remained inactive by the end of 2024. Recent efforts to develop new strategies in Albania, Kosovo, and Bosnia and Herzegovina illustrate some momentum, but in some cases also reflect recurring concerns, such as lack of transparency, political ownership, prioritization of CSO-related matters, or data for evidence-based policymaking.

Institutional mechanisms intended to facilitate cooperation between civil society and governments remain largely symbolic or inactive. In several countries, including North Macedonia and Montenegro, councils for cooperation have been non-functional for years. In Albania, the Council continued to operate but offered little meaningful input, while Serbia's council, established in 2023, failed to deliver on its mandate amid political instability and lack of follow-through. Across the region, mechanisms often lack legal clarity, resources, or authority to drive cooperation forward.

Kosovo stands out with a more structured and participatory approach, where consultative bodies are more active and CSOs contribute to agenda setting and follow-up actions. Still, the burden of initiative often falls on civil society, limiting the long-term sustainability of cooperation.

3.1.1. State Policies and Strategies for Development of and Cooperation with Civil Society

Over the years, the participation and meaningful involvement of civil society in public dialogue and policymaking processes in the Western Balkans and Turkiye have steadily declined, threatening to undermine democracy and restrict civil society's ability to advocate for social change. Strategic documents for civil society development and cooperation exist in all six Western Balkan countries, yet they remain largely ineffective due to weak implementation, limited political prioritization, and lack of institutional accountability. While governments formally commit to fostering cooperation with civil society through dedicated strategies or action plans, these are often developed without meaningful consultation and rarely backed by adequate resources or consistent monitoring mechanisms.

On the other hand, Türkiye has no legally binding strategic documents dedicated to development of and cooperation with civil society, except the national development plans. While the 12th Development Plan emphasizes the importance of CSOs actively participating in policy- and decision-making processes, strengthening their capacities, and enhancing cooperation among public institutions, the private sector, and CSOs, it lacks sufficiently concrete steps for implementing these objectives. The Directorate General for Relations with Civil Society published a Draft Civil Society Strategy Document and Action Plan 2023–2027 on its website in August 2022, inviting feedback from CSOs, relevant experts, academics, and the general public – however, as of the end of 2024, this policy document had not entered into force.

The development of new strategies in 2024, including in Albania, Kosovo, and Bosnia and Herzegovina, reflects some momentum, but also highlights persistent shortcomings. In Albania, only 11% of the commitments from the 2019–2023 Roadmap were fulfilled, with no official evaluation report or substantive public information about the next roadmap, expected for 2024–2027. Civil society actors have repeatedly raised concerns about the lack of transparency, inclusiveness, and institutional ownership of the process.[75]

Kosovo marked a more structured approach by launching the drafting of a new Government Strategy for Cooperation with Civil Society (2025–2030), following a gap year after the previous strategy ended in 2023. The process has included a series of consultative meetings involving the Office for Good Governance and civil society, addressing key areas such as citizen participation, funding mechanisms, service delivery, and volunteering. However, the absence of reliable national data on the CSO sector limits evidence-based policymaking, and the process remains limited by a lack of political prioritization to ensure the timely finalization of this policy document.

[75] The information is retrieved from the webpage of the National Resource Center for Civil Society in Albania. Available at: https://resourcecentre.al/2025/02/24/open-letter-on-the-assessment-of-the-roadmap-for-government-policy-towards-an-enabling-environment-for-civil-society-development-2019-2023-and-the-drafting-of-the-roadmap-for-the-period-2024/

In Bosnia and Herzegovina, the drafting of the first Strategy for an Enabling Environment for Civil Society moved forward in 2024, with regional consultations and inputs from CSOs. While some proposals were integrated, concerns remain about fragmented implementation and inconsistent engagement at different government levels. North Macedonia continues to operate under its 2022–2024 Strategy, with limited updates on impact, while Serbia's 2022 strategy remains stalled amid civil society boycotts and deteriorating state-CSO relations.

A common challenge across the region is the lack of robust monitoring and evaluation systems. Most strategies are implemented without dedicated funding or action plans, and few include measurable indicators or transparent reporting mechanisms. Even where consultations occur, follow-up is rare, and CSO feedback is often ignored. Oversight bodies, where they exist, are either inactive or lack authority and resources to drive meaningful change.

3.1.2. Institutions and Mechanisms for Development of and Cooperation with Civil Society

Intersectoral cooperation and trust remain stagnant. The effectiveness of established formal institutional mechanisms intended to facilitate cooperation between state authorities and civil society remains limited due to political inertia, lack of trust, and under-resourcing. Despite some reforms and ongoing consultations in 2024, many mechanisms continue to operate as symbolic structures with minimal real influence on policymaking.

In several countries, including North Macedonia and Montenegro, councils for cooperation have been non-functional for nearly three years. Attempts to revive these bodies have been stalled[76] by both institutional inaction and low CSO participation—often driven by distrust in the mechanisms' legitimacy or impact. One of the major disincentives in the case of Montenegro was the interpretation of anti-corruption laws that classify CSO representatives in working bodies as public officials. However, in a positive development, in 2024, the Agency for Prevention of Corruption issued an important interpretation of the Law on the Prevention of Corruption, confirming that representatives of NGOs serving on government working bodies are not to be considered public officials. This clarification on NGO participation in government working bodies removes significant legal ambiguity that had previously discouraged NGO participation, as being classified as a public official would have subjected individuals to burdensome reporting requirements and created barriers to further civic engagement and funding eligibility.

Even in countries where councils remain formally active, such as Albania, BiH and Serbia, the mechanisms fall short of providing meaningful input into public policy. Albania's

[76] The new government has initiated consultations on reactivating the Council, with a draft decision underway, while a call for selection of 14 members of the Council representing CSOs was opened at the beginning of 2025. Amendments to the main law on CSOs are expected to define the roles and responsibilities of the Council, but the working group tasked with this effort remains inactive.

National Council for Civil Society (NCCS)[77] continued to operate without legal reform in 2024 and remained largely ceremonial, failing to effectively represent or advocate for civil society priorities. Despite discussions held during the NCCS meeting in October 2024 regarding its founding law, no legal amendments were adopted[78]. Similarly, Albania's National Council for European Integration (NCEI)[79] hosted meetings with civil society, but concerns over the lack of transparency in the EU negotiation process and limited access to official documents highlighted the need for a more inclusive and accountable approach. In BiH, the Advisory Body of Council of Ministers for cooperation with civil society has faced chronic under resourcing (no official e mail, no travel funds), difficulty securing formal meetings with the Council of Ministers itself, and limited awareness of its role across governments.

In Serbia, the Council for Creating an Enabling Environment for Civil Society—established in 2023—has failed to deliver on its mandate amid snap elections, membership delays, and broader political hostility. Civil society actors report being included in state consultations only as a formality, with their contributions dismissed or ignored. This tokenistic engagement is compounded by government rhetoric portraying CSOs as political opponents, undermining the credibility and purpose of cooperative mechanisms.

Kosovo stands out as a relatively more functional example. Its Council for Government Cooperation with Civil Society includes both CSO and government representatives and is organized around key thematic areas. Although its operational scope remains modest, CSOs play an active role in shaping agendas and follow-up actions. Still, the burden of initiative continues to rest primarily on civil society rather than state actors, limiting the sustainability and institutionalization of cooperation.

Across the region, limited mandates, lack of political will, and weak institutional support consistently undermine the potential of cooperation mechanisms. Furthermore, CSO engagement is hindered by poor communication, low transparency, and inadequate feedback loops. In several cases, the mandates of council members have expired without timely replacement or reform of legal frameworks—reflecting broader institutional disregard for civil society's role.

[77] Government of Albania, Decision No. 311, dated 02.10.2024 "On the Approval of the Roadmap for the Functioning of Democratic Institutions" Available at: https://amshc.gov.al/wp-content/uploads/2024/10/vendim-2024-10-02-611.pdf
[78] National Council for Civil Society, 2024, "Minutes Meeting", pg. 6. Available at: https://kkshc.gov.al/wp-content/uploads/2024/11/Procesverbal-Mbledhje-KKSHC-16.10.2024.pdf
[79] National Council for European Integration, 2025, *"Annual Report 2024".* Available at: https://kuvendiwebfiles.blob.core.windows.net/webfiles/20250312105222607 8Raporti%20Vjetor%20i%20KKIE%202024.pdf

3.2. Involvement in Policy- and Decision-Making Process

Civil society involvement in policymaking across the Western Balkans and Türkiye remains largely superficial. In 2024, consultations were frequently rushed, poorly coordinated, or limited to late drafting stages, with minimal transparency and weak feedback mechanisms. Accelerated legislative timelines, particularly in Kosovo, Montenegro, and North Macedonia, further sidelined CSOs. Although platforms for public input exist in some countries, meaningful engagement remains rare and concentrated in capital cities.

Access to draft legislation and public information is hampered by fragmented systems, low compliance with right-to-information laws, and weak enforcement. Drafts are often published late, without summaries, or hidden in hard-to-navigate websites. While digital tools are widely used, poor functionality, lack of follow-up, and low digital inclusion continue to limit their effectiveness—especially for rural and marginalized groups.

CSO participation in cross-sector bodies is inconsistent and often lacks transparency. While Kosovo, Albania, and Montenegro maintain formal selection processes, concerns persist over government influence and repeated appointments of the same organizations. In Serbia, BiH, and Türkiye, participation is mostly ad hoc or dominated by state-aligned actors (GONGOs), further complicating the landscape.

3.2.1. Standards for CSO Involvement

Across the region, consultations reveal common obstacles: limited notice periods, poor access to draft legislation, and inadequate or generic feedback following consultations. While most governments have formal requirements for public consultations, such as minimum timelines and provisions for early-stage CSO engagement, these are frequently bypassed or applied hastily. In 2024, as a result of these recurring challenges, public participation remained largely procedural rather than meaningful.

The quality of consultations declined in several countries due to political or administrative pressures. In Montenegro, rapid legislative processes – accelerated by political timelines and EU benchmarking exercises – left little room for inclusive dialogue. In Kosovo, despite its previously strong model of online consultation, in 2024 the process remained largely performative, with technical disruptions and limited institutional responsiveness undermining its effectiveness. Similarly, Montenegro's consultation efforts suffered from poor coordination and transparency, particularly at the local level. In both countries, civil society was increasingly sidelined from working groups and early drafting stages. In North Macedonia, too, laws were passed in a short and hasty procedure without any prior announcements and opportunity for civil society genuine contribution. In Türkiye, the absence of binding legislation and inclusive mechanisms limits CSO participation in decision-making, which remains rare and largely one-sided.

While the volume of published consultation documents has increased in some contexts – in Albania the number of draft documents published on the electronic register doubled since 2023 – this quantitative growth has not been matched by improvements in quality. However, the involvement of CSOs in the early stages of law and policy drafting is uncommon. When it does occur, it often lacks meaningful engagement and transparency. Institutions usually report only aggregated participation data, without distinguishing between stakeholder types, leading to inaccurate representations of citizen involvement. Consultations remain highly centralized, with CSOs outside capital cities particularly facing barriers to access and participation. New assessments in Albania revealed a persistent disconnect between parliamentary processes and citizen engagement, highlighting the need for more structured, inclusive formats and digital tools to bridge this gap.

Across the region, the presence of government-organized non-governmental organizations (GONGOs) further complicates the landscape. These entities, often seen as extensions of governmental influence, have raised concerns about undermining independent civil society efforts, particularly in advocacy spaces for women's rights and LGBTQI+ rights. By promoting state-aligned narratives, GONGOs risk marginalizing genuine advocacy initiatives, while creating a façade of civil society consensus.

Feedback mechanisms across the region remain weak. While some ministries publish summaries of input received, detailed explanations for why CSO proposals are accepted or rejected are rare. Generic or identical feedback undermines trust and discourages future engagement. The integration of CSO research and evidence into policymaking is also minimal, with few formal channels for incorporating independent analysis, despite its availability—particularly in fields such as anti-discrimination, education, and social policy.

The lack of training for public officials on CSO engagement standards continues to hinder implementation. Most civil service systems in the region do not offer structured, mandatory programs on participatory policymaking. In 2024, no such trainings were reported in BiH, Albania, or Türkiye, while Montenegro and Serbia maintained limited initiatives through existing public administration academies. Coordination roles—such as CSO liaison officers or designated consultation units—remain inconsistently established, under-resourced, or functionally inactive in many countries.

3.2.2. Public Access to Draft Policies and Laws

Access to public information for civil society and citizens across the region continues to face legal and procedural barriers, with bureaucratic obstacles and a lack of transparency impeding timely access to information and informed participation in public affairs.

Public institutions often fail to publish draft laws in a timely, accessible, or user-friendly manner. In Bosnia and Herzegovina, for instance, while laws are published within legal deadlines, they are hidden within fragmented and difficult-to-navigate websites across over 80 institutions, severely limiting public visibility and coordination. In Kosovo and Montenegro, although online publication procedures exist, consultation documents often lack essential summaries or are posted at late stages, reducing the quality of public engagement. In Türkiye, while parliamentary draft laws are generally accessible, secondary legislation—such as bylaws and directives—is rarely published or opened for consultation, limiting transparency.

The situation is further complicated by insufficient compliance with Right to Information laws. Responses to information requests are often delayed or denied on broad grounds such as commercial secrecy or national interest. In BiH, recent legal amendments have expanded the list of exceptions and introduced burdensome appeal procedures, especially affecting CSOs. Similarly, the right to information is not intensively and functionally exercised in Türkiye, due to the exceptions and broad discretion provided to public officials to reject information requests by legislation. In Albania, despite 2023 legal reforms strengthening the role of the Information Commissioner and institutional obligations, many public bodies continue to neglect their legal duties. Issues such as the appointment of low-level staff as coordinators and the lack of consistent internal procedures further weaken implementation. In addition, an institution has the discretion to decide what information it provides and what it withholds, including by requesting a fee.[80] In Serbia, rising complaints and delays signal widespread institutional reluctance or incapacity to fulfil obligations, even where enforcement bodies exist.

[80] Balkanweb, National Conference on the Right to Information – Dervishi: Challenges Facing the Right to Information and Transparency, 2024: https://www.balkanweb.com/konferenca-kombetare-e-te-drejtes-per-informim-dervishi-ja-sfidat-me-te-cilat-perballet-e-drejta-per-informim-dhe-transparenca/#gsc.tab=0

Digital tools have become the primary channel for accessing draft legislation and engaging in consultations, but their utility remains hindered by structural and societal challenges. Platforms in Albania, North Macedonia, and Montenegro offer centralized portals, yet adherence is low. Kosovo's platform has seen reduced functionality and accessibility, with consultations typically occurring only in the final drafting stages, excluding CSOs from early influence. Across the region, feedback to public comments is rare or generic, undermining trust in the process.

Bureaucratic hurdles and poor institutional practices further limit transparency. Frequent personnel changes, low-level staff responsibility for RTI coordination, and weak accountability mechanisms contribute to poor implementation. Although the Regional School of Public Administration (ReSPA) has promoted digital tools as a means to improve inclusivity and transparency, their effectiveness is uneven—particularly for rural or marginalized populations with low digital literacy or poor internet access.[81]

Legal provisions for sanctions exist but are rarely applied. Albania adjusted its fines to better reflect civil servant salaries, and BiH introduced financial penalties for non-responsiveness, yet actual enforcement remains scarce. Despite growing recognition of the need for open governance—reflected in initiatives like North Macedonia's Transparency Strategy 2023–2026—the region continues to face persistent challenges in ensuring meaningful, timely, and inclusive access to public information and draft legislation.

3.2.3. CSOs' Representation in Cross-Sector Bodies

The inclusion of civil society representatives in advisory and decision-making bodies remains uneven, with legal frameworks often failing to ensure fair, transparent, and meaningful participation. Albania, Kosovo, and Montenegro have formal legislative provisions mandating CSO inclusion in various cross-sector bodies. However, challenges persist in practice.

In Kosovo, the Office for Good Governance and other public institutions, in collaboration with the CiviKos Platform, have established a criteria-based selection process that, while not legally institutionalized, has become a consistent practice. The process includes public calls with clearly defined nomination and voting procedures. Despite this structured approach, concerns remain about selective engagement and limited diversity among participating CSOs. Montenegro maintains formal procedures for including CSOs in policymaking bodies, but the interpretation of the Anti-Corruption Law, equating CSO representatives with public officials, creates administrative burdens and deters participation. A recent interpretation of the law by the Anti-Corruption Agency that CSO

[81] ReSPA, ReSPA Panel at the EGPA 2024 Conference: Insightful Discussion About the Potential of Digital Tools in Enhancing Inclusivity and Transparency Across the Policy-Making in the Western Balkans, 2024: https://respaweb.eu/0/news/703/respa-panel-at-the-egpa-2024-conference-insightful-discussion-about-the-potential-of-digital-tools-in-enhancing-inclusivity-and-transparency-across-the-policy-making-in-the-western-balkans

representatives in working groups are not considered public officials has yet to produce tangible results. Reports also highlight that the same organizations, often those close to the government, are repeatedly appointed, raising fears of favoritism and GONGO presence.

In contrast, Serbia, BiH, and Türkiye lack standardized and transparent mechanisms. Serbia's legislation includes non-binding guidelines and inconsistent application across ministries. While 35 advisory bodies included CSOs in 2023, civil society reports suggest these bodies often consist of state-aligned organizations, sidelining independent actors. In BiH, participation is largely ad hoc, with no legal obligation for CSO involvement at the state level. In Republika Srpska, CSOs may attend committee sessions in the National Assembly, yet most accredited organizations are government-aligned or recipients of public funding, with limited space for independent voices. Türkiye has partial legislative mandates allowing CSO participation, but decisions remain at the discretion of ministries. In practice, ministries often bypass open calls in favor of directly inviting politically aligned organizations, undermining representation, particularly in sensitive advocacy areas such as women's rights or LGBTQI+ issues.

North Macedonia does not have a standardized system for CSO selection in cross-sector bodies. While the Council for Cooperation with Civil Society often nominates representatives, the process lacks transparency and credibility, with CSOs expressing concerns over politically influenced appointments—particularly in key bodies like the Commission for Protection against Discrimination. Only 22% of CSOs reported participating in any advisory structure in recent years, reflecting growing disengagement.

Overall, while some countries show formal commitment to involving CSOs in public decision-making, a lack of consistent standards, political favoritism, and insufficient transparency in the selection process continue to undermine the credibility and inclusivity of cross-sector governance structures in the region.

3.3. Collaboration in Service Provision

All of the countries legally permit CSOs to provide public services in areas such as social protection, education, and legal aid. While Albania, North Macedonia, and Montenegro have introduced frameworks that formally enable CSO participation in service provision, implementation remains uneven. Procurement procedures often lack transparency, and burdensome licensing and eligibility criteria continue to disadvantage smaller and independent organizations. In BiH and Serbia, fragmented regulations and restrictive rules limit access and efficiency, while favoritism in contracting remains a widespread concern.

Encouraging progress was made in 2024 in Kosovo and Albania. Kosovo advanced a collaborative drafting process for new rules on contracting NGO services, aimed at improving transparency and procedural clarity. Albania adopted further reforms aligning public procurement laws with EU standards and expanded support for social services through new strategies and a growing Social Fund. Despite these efforts, systemic barriers—particularly licensing hurdles and inconsistent registration procedures—continue to obstruct equitable access to service provision opportunities across the region.

State funding for CSO-provided services remains unstable and insufficiently structured. Funding is typically short-term and rarely covers overhead costs, with delays frequently reported, especially in BiH and Serbia. Monitoring mechanisms vary, with more structured systems in Kosovo and North Macedonia, and inconsistent or excessive oversight elsewhere. The absence of multi-year contracts and harmonized evaluation frameworks continues to hinder the sustainability and quality of CSO service delivery in the region.

3.3.1. CSO Engagement in Service Provision and Competition for State Contracts

All Western Balkan countries legally allow CSOs to provide public services in areas such as social protection, education, and legal aid, broadly aligning with international standards. Albania and North Macedonia stand out for adopting procurement rules that emphasize quality and inclusiveness over cost, creating a more equitable environment for CSOs to compete for service contracts. Montenegro offers several legal pathways—including public procurement, calls for proposals, and public-private partnerships—though practical barriers persist.

However, the implementation of these frameworks remains inconsistent. Across the region, CSOs face opaque procedures, restrictive licensing requirements, and favoritism that often favors politically affiliated or larger organizations. In Serbia, burdensome licensing rules frequently exclude CSOs from delivering social and legal services. In BiH, fragmented regulations and a lack of a unified funding process hinder CSO participation and reduce efficiency. Public procurement systems across the region are often perceived as inaccessible and overly complex, particularly for smaller or rural-based organizations.

Encouragingly, Kosovo made progress in 2024 through a collaborative process initiated and coordinated by the Ministry of Finance, Labor and Transfers. A working group consisting of 11 members, including 4 CSO representatives, worked on finalizing a draft Administrative Instruction for contracting NGO services. Although the Instruction was not yet adopted, this marks a significant step toward procedural clarity, greater transparency, and improved financial sustainability.

In Albania, a 2024 amendment to Law No. 162/2020 on Public Procurement further aligned the legal framework with EU standards, including provisions for technological modernization. [82] Social services procurement is regulated by a specific Council of Ministers Decision, which defines eligible services and outlines simplified procedures for smaller contracts. This was complemented by broader reforms in the social services sector, including the adoption of the National Social Protection Strategy (2024–2030) and the Social Inclusion Policy (2024–2028), which aim to expand accessibility and decentralization through measures such as an annually growing Social Fund to support at least 12 new services per year. However, while contracts below 20 million ALL are exempt from formal procurement procedures, they must still be registered, underscoring the need for transparent planning and oversight.

Despite these developments, licensing hurdles remain a key bottleneck. In Montenegro and Serbia, approval procedures are lengthy, and documentation demands are high. In BiH, inconsistent standards across cantonal and entity levels make the process of registering CSOs for education and social service provision especially burdensome. These systemic

[82] Official Gazette of the Republic of Albania, Decision No. 121, dated 6 March 2024, on the Establishment and Functioning of the Technical Secretariat of the Council for Cooperation with Civil Society, 2024: https://qbz.gov.al/preview/aef29e14-849b-4f8c-9915-888c861bcb4f/cons/20240308

challenges continue to disproportionately affect smaller, less-resourced CSOs, limiting their ability to compete fairly and deliver essential services to their communities.

3.3.2. State Funding and M&E of CSO-Provided Services

While no major legal barriers prevent CSOs from receiving public funding for service provision across the Western Balkans, structural issues persist. Laws in countries like Serbia, Kosovo, and Montenegro allow CSO access to funds for services such as health, education, and social protection. However, funding is typically annual, with multi-year contracts largely absent—creating uncertainty and administrative burdens, especially in North Macedonia and BiH.

Funding rarely covers institutional (overhead) costs, and delays are common, notably in Serbia and BiH. In contrast, Kosovo shows relatively better payment timelines, though one in four CSOs still reports delays. The lack of predictable funding particularly threatens services for vulnerable groups, such as safe houses in BiH.

Monitoring frameworks vary widely. Kosovo and North Macedonia have structured mechanisms, while BiH and Serbia show inconsistent oversight. Albania allows authorities to inspect service sites and issue improvement recommendations, though implementation is uneven. In some countries, monitoring is either excessive or based on unclear standards, undermining trust and complicating service delivery. Without long-term contracts and harmonized evaluation, sustainability and quality remain ongoing challenges for CSO-provided services.

Conclusions and recommendations

In 2024, civil society in the Western Balkans and Türkiye (WBT) faced deepening challenges across all three Monitoring Matrix areas. While legal guarantees for freedoms of association, assembly, and expression remain largely in place, they are increasingly undermined by restrictive practices, administrative and financial burdens, and shrinking political space. State interference, whether direct or indirect, continues to affect the operational and financial viability of civil society, while meaningful participation in policymaking remains largely symbolic in most countries.

To reverse these trends and support the development of a resilient, independent, and vibrant civil society, the following priority actions are recommended:

1. STRENGTHEN BASIC LEGAL GUARANTEES OF FREEDOMS

- Decriminalize defamation in Republika Srpska without delay to align with international human rights standards and protect freedom of expression.
- Adopt anti-SLAPP legislation across the region, in line with Council of Europe and EU standards, to curb legal harassment of journalists and activists—particularly urgent in Türkiye and Republika Srpska.
- Introduce legal protections against smear campaigns targeting CSOs and activists, especially in Serbia and Kosovo where these practices are increasingly used to silence dissent.
- Ensure effective, accessible, and reliable registration systems for CSOs across the region, addressing delays and inefficiencies that continue to hinder civil society formation and legal recognition.
- Reform AML/CFT frameworks to remove the blanket classification of CSOs as high-risk entities, and apply proportionate, risk-based standards that do not obstruct legitimate civic activity.
- Conduct transparent and democratic reforms of media oversight bodies, such as Serbia's REM, to ensure fair and independent regulation of the media landscape.

2. IMPROVE CSO FINANCIAL VIABILITY AND SUSTAINABILITY

- Finalize and simplify tax reforms to enable CSOs to benefit fully from available exemptions and incentives, particularly for donations, grants, and income-generating activities.

- Ensure equal treatment of CSOs and private sector employers in access to state-supported employment programs and benefits.
- Harmonize VAT policies and reduce administrative burdens to unlock the potential of philanthropy and social entrepreneurship.
- Transition from project-based funding to multi-annual operational grants that foster strategic planning, institutional stability, and long-term impact.
- Introduce transparent, needs-based public funding mechanisms, with clear criteria for allocation, monitoring, and evaluation, and safeguards against political influence.
- Enhance non-financial support for CSOs, such as access to public infrastructure, digital tools, and training programs that are practical and widely accessible.
- Modernize civic education systems to promote awareness of civic participation, human rights, and the role of civil society from an early age, supporting a culture of active citizenship.

3. ENHANCE STATE–CSO COOPERATION AND PARTICIPATION

- Ensure that national civil society strategies are adequately funded and backed by concrete implementation plans, avoiding tokenistic or symbolic initiatives.
- Establish legally binding frameworks for state–CSO cooperation, ensuring continuity and accountability beyond political cycles.
- Protect the integrity of the civic sector by preventing GONGO infiltration, and rejecting efforts to institutionalize state-affiliated organizations that distort civil society representation.
- Guarantee timely, inclusive, and transparent policymaking processes, with genuine CSO engagement, accessible information, and meaningful feedback loops.
- Address procedural barriers such as short consultation windows, inaccessible platforms, and lack of response mechanisms that prevent effective participation.
- Leverage digital tools to increase inclusiveness, particularly for CSOs based outside capitals or representing marginalized groups.

The path forward demands both political will and institutional reform. Reversing civic space decline requires not only safeguarding legal rights but enabling their practical realization—through sustainable funding, participatory policymaking, and proactive protection of civil society actors. Policymakers, donors, and international partners must work in concert to support these reforms and defend civic space as a pillar of democracy and EU integration in the WBT region.

Annexes

Monitoring Matrix Framework and Methodology

The Monitoring Matrix on Enabling Environment for Civil Society Development is a detailed theoretical framework based on international human rights and freedoms and regulatory practices of European countries and the EU. The framework is built around three core areas: Basic Legal Guarantees of Freedoms; Framework for CSOs' Financial Viability and Sustainability; Government – CSO Relationship, each divided in sub-areas. The areas are elaborated by standards, which are further specified through legal and practice indicators. For each indicator there is a clear guidance on the data gathering strategy which should be utilized by country researchers, including publicly available data, FoI requests, survey, focus groups and interviews, as well as relevant secondary sources.

The Monitoring Matrix is a comprehensive methodology, developed in 2013 and last revised in 2023, designed to assess the environment for CSOs in the Western Balkans and Türkiye against international standards. The Matrix operates on an annual reporting cycle which ensures a e systematic and comparable evaluation across the region and across years, helping stakeholders track progress or regression, identify gaps and emerging trends, and prioritize reforms.

The research undertaken aims to provide evidence on the enabling environment for civil society development and to influence the support of governments, the European Union and other donors towards more sustainable and strategic development of the sector. On national level, MM findings have been feeding national strategies for cooperation with and development of the sector and have directly supported the drafting of key laws. On European level, the MM findings have been consistently used in the EC Country reports of the Enlargement Package, and as of 2024 in the Rule of Law Report.

Operationalization and Data collection

There are 3 areas, 8 sub-areas, 22 standards and 129 indicators defined in the monitoring methodology. The legal indicators are measured by coding the presence or absence of rules, costs, procedures and obligations enshrined in legal regulation (primary and secondary) and policy frameworks enacted in the respective countries. To assure standardization and comparability of the data gathering process regarding the practice indicators, country researchers follow a methodology plan in which each of the 80

indicators are further operationalized in concrete mandatory and additional data types (i.e. operationalized dimensions of a practice indicator) to be reported across the countries. The mandatory data types tap into the core building blocks of a practice indicator as described in the Monitoring Matrix Toolkit. They mandate the reporting of optimal information without which one could not be able to evaluate the respective indicator. The additional data (operationalized dimensions) specified for each practice indicator are reported if country researchers want to deepen and further illustrate specific practice indicator (e.g. via case study; see next section on country-specific notes on methodology).

The data gathering strategy for the practice indicators is tailored to match the mandatory data types specified in the methodology plan. For each indicator there is a clear guidance on the data gathering strategy (instruments and sources) which should be utilized by country researchers. The specified data gathering instruments and sources follow an implicit hierarchy, in which publicly available factual data (e.g. official statistics) are the most important source of data for assessing practice indicators, followed by survey data from civil society organizations, which in turn is followed by relevant secondary sources (e.g. from CSOs reports, Ombudsman and media). Finally, at the end of the hierarchy are focus groups and interview data, being subjective type of data, which covers smaller groups of respondents.

The two core-data gathering instruments for data gathering for the Monitoring Matrix exercise are survey and freedom of information (FoI) requests. For most of the indicators, further triangulation through secondary sources (CSO and international reports, media content etc.) is recommended. In addition to these instruments, an adequate number of focus groups and expert interviews should be conducted, to deepen the analysis.

FoI requests should be extensively used when public information and statistics on the state of civil society and their environment (primary factual data) are not readily available. This practice in itself is a 'pressure' towards institutions to increase transparency and produce relevant information on the state of CSOs and their environment. The researchers can draw from a detailed bank of FoI questions tailored to match the operationalized practice indicators.

The survey questionnaire collects information on CSOs' experiences and perceptions on the key aspects of the enabling environment for civil society. The organisational survey includes 42 questions matching the mandatory data types (operationalized dimensions) on basic rights and freedoms, organisational and financial sustainability, and civil society's cooperation with the state. The questionnaire dominantly consists of closed questions, and fewer follow-up open questions which require the respondents to elaborate on their experience. The same questionnaire is implemented across all countries, and only the formulation of few items is slightly adapted to the concrete country context to assure questions are understood by respondents. The data collected from the survey is confidential and used strictly on anonymous basis. Individual responses are not connected to the organizations which answered the survey and reported only in an aggregate form.

The survey is sent to lists of formal CSOs compiled and updated by country researchers on the basis of available registers or other alternative lists of active CSOs in the country. For a

successful survey which reflects the state of enabling environment in the country, the key aspect is creating a survey list which reflects the population of CSOs in the country. The list should be updated with new organizations on an annual level. If the researchers cannot update the list with organizations retrieved through official records, then they should map new actors in the policy process on local and national level. As per the sampling approach, using a mixed strategy of organizational-centered sampling involving the use of ready-made organizational lists (if available by state and/ or voluntary registers) and a policy-centered sampling involving organizations which are active in policymaking across policy fields is recommended.

Focus groups will primarily serve to provide an in-depth insight into the experiences and perspectives of CSOs. The survey will help in identifying key issues to be addressed and deeper explored through focus groups. There should be 3-5 focus groups organized in each country, with 8-12 people per FG, preferably including the following types of CSOs: Non-formal/Non-registered actors including grass-root organizations, Decentralized/Small organizations and/or outside the capital operating CSOs, Service-providing CSOs, CSOs involved in cooperation/consultation processes, cross-sector bodies (although this will be covered also as a horizontal issue in the rest of the FGs), and Gender, youth and/or environment organizations (or other sectors where the survey shows increased challenges). Gender issues should be part of all focus groups as a cross-cutting theme. Focus groups will serve also to check the findings on the enabling environment gathered through the survey, bringing in cases from practice when it comes to basic legal guarantees of freedoms, framework for CSOs' financial viability and sustainability, and CSO-government cooperation framework.

Expert Interviews will serve to get a more detailed perspective of relevant stakeholders on specific parts of the enabling environment, collect information on useful secondary data, and also get their insight into the more general civil society situation. There should be 10-15 expert interviews conducted per country with the following stakeholders: CSOs or think-tanks dealing with enabling environment issues, Media associations or CSOs dealing with freedom of expression, CSOs with expertise on Tax/fiscal framework and practices, National level umbrella or representative body on issues such as volunteerism, (if applicable), and National banking association representative. The interviews will deepen the findings on enabling environment, and also help in identifying key challenges and needs of civil society. In addition to the guiding questions provided, researchers can formulate additional questions that capture contextual developments in the country.

Data analysis and interpretation

To analyse and interpret the data, country researchers use a unified data collection template which provides the indicators description (including the mandatory and additional data types for the practice indicators) and five category descriptions ranging from fully enabling to fully disabling environment provided under each indicator. The five category descriptions are specified for each legal and practice indicator in the Monitoring

Matrix Toolkit, to enable researchers – based on the reported data – to choose one code (score) which most accurately summarizes the state of enabling environment concerning the respective indicator. In a first step, the researcher reports the required data types collected through different sources in the template box. For example, they report factual data from primary sources complemented with descriptive statistics or cross tabulations based on survey data. In a second step, they choose one of five category descriptions specified for the respective indicator which best illustrates the reported data. The categories enable unified comparison of findings on the level of indicators across all country reports.

The system was created to address the need for 'compressed' and effective visual communication of findings and a systematic presentation of the changes in the enabling environment for CSDev in terms of standards across countries and years. It does not replace, but rather complements the qualitative assessment, as the narrative country reports are the basis on which categorization is conducted. In this context, the Monitoring Matrix online platform has also been updated and redesigned to be more user-friendly and assist in the achieving of the goals of the Monitoring Matrix, i.e. enable a more practical and efficient method for tracking the enabling environment for CSDev, as well as help in the drawing of comparisons between the countries in the region.