

# Enabling Environment Snapshot

Mexico

November 2025



#### Context

The third quarterly report, or "Snapshot", analyses the enabling environment for civil society based on events that occurred between July and October 2025, as well as following up on relevant events reported in the "Country Focus" report published in September this year.

During this period, patterns of violence and lack of protection towards activists, human rights organisations and environmentalists continue to be a cause for concern, accompanied by growing censorship of freedom of expression. However, innovative initiatives in the environmental field can also be observed, as well as efforts by organisations to inform themselves and express their needs in the face of the reform of the Federal Law for the Prevention and Identification of Operations with Illicit Resources.

At the institutional level, the new Court took office in September and the reform of the Amparo Law establishes conditions that require careful monitoring of the administration of justice. At the local level, mechanisms for participation and collaboration remain in place, while organisations specialising in digital rights have taken action in response to new surveillance laws, highlighting both risks and opportunities.

### 1. Respect and protection of fundamental freedoms

During the last four months, respect for and protection of fundamental freedoms in Mexico remained fragile. Violence against land defenders, activists, journalists, and communities continues to create a restrictive environment for the exercise of rights, especially in regions where organised crime and megaprojects are advancing on territories. Cases such as the 32 crimes recorded in Oaxaca against land defenders, Frayba's reports of more than 51 incidents of harassment and surveillance in Chiapas, and forced displacement in Sinaloa, Oaxaca, and Chiapas reflect patterns of harassment and lack of protection for people in these regions.

At the same time, there has been a resurgence of student movements in different parts of the country. During the last four months, demonstrations were recorded in <u>Jalisco</u>, <u>San Luis Potosí</u> and the <u>State of Mexico</u>, while in previous months there were also significant actions in <u>Puebla</u> and <u>Nuevo León</u>.

In these cases, students demanded real opportunities for participation, increased funding, and justice for abuses committed against students within universities. This phenomenon is particularly relevant given the long tradition of the student movement in Mexico, historically linked to the defence of rights and the demand for social justice. Its strength is reactivated in September and October, with the "Never Forget" demonstrations in memory of 2 October and the persistent demands for truth and justice in the case of the 43 disappeared students from Ayotzinapa.

In contrast, there are also positive experiences that show opportunities for access to justice, such as the campaign promoted by CEA Justicia Social and Elementa DDHH with the #Libéralas campaign, which has succeeded in freeing five women who were unjustly deprived of their liberty.

A couple of relevant cases in the environmental field were the <u>cancellation of the Fourth Pier project</u> in Cozumel, Quintana Roo, which threatened the "Villa Blanca" reef. The cancellation of the pier represents a significant achievement, the result of collaboration between civil society organisations and local residents.



On the other hand, the unprecedented injunction promoted by the movement <u>¿Ballenas o gas?</u> (Whales or <u>Gas?</u>) in defence of the whales of the Gulf of California sets a precedent by recognising the environment and wildlife as subjects of law. This latter case is particularly relevant as it occurs in the context of the recent reform of the Amparo Law. Monitoring its evolution will provide a better understanding of the new changes that this reform could bring to the defence of human and environmental rights in Mexico.

In terms of freedom of expression, the facts point to worrying trends: threats from organised crime are spreading to more regions and judicial harassment is emerging as a new form of censorship. According to Article 19, between January and July 2025, 51 cases of legal harassment against journalists were documented, reflecting a growing use of laws as tools of persecution. For these reasons, following the violence against reporters in its first year in office, Reporters Without Borders has urged the federal executive to guarantee the effective conditions and political will to protect journalists in Mexico.

## 2. Supportive legal framework for the work of civil society actors

During this period, the "Manifiesta tu Ciudadanía" (Express Your Citizenship) initiative has followed up on the recent reform of the Federal Law for the Prevention and Identification of Operations with Illicit Resources (LFPIORPI), participating in discussion forums and coordinating networks of organisations.

These spaces are intended to establish a dialogue with the Financial Action Task Force (FATF) in the context of the mutual evaluation of Mexico to be carried out in 2026, as well as to present a proposal for "General Rules" to the Ministry of Finance and Public Credit (SHCP) and the Financial Intelligence Unit (UIF). These actions aim to raise awareness among government actors so that proportional measures for CSOs are incorporated into the transitional articles of the reform by July 2026.

In this same vein, the Manifiesta initiative launched a national survey during July and August, which was answered by 430 CSOs, with the aim of identifying the main fiscal and legal challenges faced by organisations in Mexico. The most relevant findings<sup>1</sup> are as follows:

- 1) Challenges in certifying activities<sup>2</sup>: Considerable time investment in collecting documents, excessive documentation and applications in one or more government agencies.
- 2) Compliance with the "LFPIORPI": Greater difficulty in obtaining documentation from international donors.
- 3) 51% of CSOs do not have an internal manual on money laundering compliance, and 54% do not know how to conduct a risk assessment for money laundering prevention.

These initial findings, beyond framing the difficulties organisations face in complying with regulations, seek to provide input to support dialogue with tax authorities next year and ensure that organisations are treated in proportion to their capacities.

On the other hand, a positive development in strengthening the legal framework and promoting the registration of CSOs occurred in September this year, when the government of Querétaro, in collaboration with various organisations, established the <u>Council for the Promotion of Civil Organisations</u>. This space seeks to consolidate collective work between CSOs and state

<sup>&</sup>lt;sup>1</sup> The full report of this survey will be available in December 2025.



authorities. Events such as this allow us to see in which states multisectoral collaboration is facilitated. It is important to follow up on these spaces so that they achieve the goal of a safer environment for organisations.

#### 3. Accessible and sustainable resources

One of the main challenges in determining the accessibility and sustainability of organisations' resources is the limited availability of information. Currently, it is only possible to obtain public information on those organisations that are authorised to receive tax-deductible donations, which leaves out a significant part of the civil society sector. Below is an overview of resources in this four-month period. At the federal level, cash donations reported by authorised donors rose from 47.22 billion pesos (2.55 billion USD<sup>2</sup>) in 2023 to 51.80 billion (2.8 billion USD) in 2024, reflecting a growth of 9.7%; However, if we adjust to constant 2018 prices, the rate is much lower (4.5%)<sup>3</sup>. This reflects a stagnation of resources for CSO donors in Mexico.

Although public information allows us to observe the aggregate evolution of the resources of authorised grant recipients, it is not sufficient to assess the sustainability of the sector. The available data show whether the amounts are growing or stagnating, but they do not allow us to accurately determine the stability or flexibility of the grant recipients' sources of funding.

At the local level, during the second half of 2025, several state and municipal governments have maintained or launched public financing mechanisms for civil society organisations (CSOs).

In <u>Colima</u>, a call for proposals was announced in October to support CSO projects with amounts of up to 75,000 pesos (4,166.00 USD), prioritising the issues of health, human rights, ecology, community development and education. Meanwhile, in Ciudad Juárez, Chihuahua, through the <u>Impulso Fund</u>, 81 organisations received a total of 57 million pesos (3.08 million USD). This fund, in place since 2022 through an agreement between the Chihuahua Business Foundation (FECHAC) and the municipal government, seeks to address issues such as women's empowerment, protection of children and adolescents, inclusion of people with disabilities, sports and mental health, culture and art, environmental care, and technology. In the same month, in the municipality of Tijuana, Baja California, the <u>Financial Support Programme for Civil Society Organisations</u> (PAFOSC 2025) awarded 90 organisations a total of 3.5 million pesos (189,189 USD), highlighting the collaboration between the social sector and local government.

Although these are not all cases of local funding, they do show where support for CSOs persists in the face of federal restrictions on public resources. However, there is still limited debate on the flexibility, sustainability and scope of these programmes, and there are significant disparities in the amounts allocated and the duration of the agreements.

In contrast, Nuevo León faces significant delays in the delivery of public resources to organisations. The <u>Nuevo León Civic Council</u> has pointed out that almost half of the approved support has not been delivered: more than 101 million pesos (5.45 million USD) are pending for 162 CSOs, equivalent to 44% of the 229.4 million (12.4 million USD) provided for in the

<sup>&</sup>lt;sup>2</sup> Conversion based on the fixed exchange rate on 7 November 2025, consulted on 7 November 2025 at https://www.banxico.org.mx/tipcamb/main.do?page=tip&idioma=sp

<sup>&</sup>lt;sup>3</sup> Sources: Cemefi with information from the 2011-2024 Authorised Donors Report. Available at <a href="https://www.finanzaspublicas.hacienda.gob.mx/es/Finanzas Publicas/Informes al Congreso de la Union.">https://www.finanzaspublicas.hacienda.gob.mx/es/Finanzas Publicas/Informes al Congreso de la Union.</a> Accessed on 17 July 2025.



Expenditure Law. Although the Secretariat for Equality and Inclusion (SII) has shown commitment to the sector, the delay could compromise the sustainability of organisations that have not yet received the resources.

Finally, an emblematic case at the state level is that of the Trust for Administration and Investment for Social Development and Public Safety in the State of Guanajuato (Fidesseg). This mechanism, which channelled business and public resources into social projects with a fund of 1.5 billion pesos (81.08 million USD), represented a model of multisectoral coresponsibility. However, in October 2024, it faced accusations of lack of transparency, which led to an audit and its dissolution by order of the state government. This caused tensions with the business sector, which filed an injunction to reverse the decision. Finally, in July 2025, the government presented the new programme "Tocando Corazones" (Touching Hearts), with a budget of 1.167 billion pesos (63.8 million USD) and a call for proposals published in August. Although its focus on transparency and intersectoral collaboration has been highlighted, doubts and demands for accountability persist, as does the need to ensure the equitable participation of all sectors involved.

### 4. State openness and responsiveness

The last four months of the year were marked by profound changes in the country's institutional architecture. The <u>start of operations of the new judiciary</u> on 1 September meant a transition with fewer ministers, a reduction in powers and a backlog of more than 1,400 cases. The main challenge will be to see whether the new dynamics consolidate or weaken the progress made in independence and access to justice.

Added to this scenario is the reform of the **Amparo Law**, which <u>generated widespread concern</u> among civil society organisations due to the risks of restricting legitimate interest and precautionary measures, which could limit collective and environmental defence. Alarms were raised over the possible <u>retroactive application of the law</u>, which would extend its effects to pending amparo cases, considered by various sectors as a serious setback in access to justice. The enacted version, with changes introduced in the Chamber of Deputies, softened some points, particularly in the <u>transitional article</u>. However, organisations and experts warn that its <u>impact will depend</u> on how it is interpreted and applied, so monitoring the Court's decisions and the pattern of justice delivery will be crucial to assessing the real scope of this reform.

At the same time, another central topic of discussion has been **electoral reform**. Although still in its preliminary stages, the President has already sent a <u>proposal and formal commission</u> for discussion in <u>Congress in early 2026</u>. In addition, she has invited citizens to participate in public hearings and debates from September to December 2025; however, the trends in legislative discussions and participation in past reforms have been merely symbolic. During these months, there have been <u>calls</u> from academia and civil society for the reform to be the product of a national consensus and not of unilateral decisions, which could lead to electoral processes once again becoming dependent on the executive branch and weaken the electoral arbiter.

As for the issue of public transparency, the successor to the National Institute for Access to Public Information (INAI), "Transparency for the People", <u>has dismissed 99.6%</u> of the appeals for review filed by citizens. This means that people have not received responses to their requests for information from the federal government. This, combined with a <u>97% cut</u> in resources for next year compared to what the previous body received, could seriously compromise the exercise of transparency in Mexico by 2026.



Another trend to watch, stemming from the institutional transition in the Mexican state, is the possible <u>deterioration of transparency in the administration of justice</u>. Undoubtedly, the information provided by state and federal prosecutors, supplemented by data from INEGI, allows for narrowing down and generating relevant findings. However, the challenge remains of how requests for information, in the face of the aforementioned factors, will be able to overcome the existing imbalances.

The transfer of the multidimensional poverty measurement from the now defunct CONEVAL to INEGI was another issue that attracted attention from various sectors. Despite initial doubts, the results showed a <u>historic reduction in poverty to 29.6</u>% between 2016 and 2024. Although the measurement followed the previous methodology with <u>some adjustments</u>, it maintained consistency and reliability. This process reinforces the importance of having autonomous bodies that guarantee evaluation and accountability in public policies.

In terms of public information, the resumption of INEGI's <u>2025 Intercensal Population Survey</u> was announced in August, aimed at updating data between decennial censuses. The decision came as a surprise, as the survey had been cancelled earlier in the year due to <u>an alleged lack of resources</u>. Although its reactivation was well received, the reasons for this change and the apparent contradiction with the previous suspension remain unknown.

During this period, a significant event was the Mexican government's refusal to accept the decision of the UN Committee on Enforced Disappearances (CED) to activate Article 34 of the Convention, on the grounds that it is a resource "for exceptional situations". This position comes amid the national crisis of disappearances and following the discovery at the Izaguirre ranch in Teuchitlán, Jalisco, in March. Added to this are the unanswered demands of the relatives of the 43 students from Ayotzinapa, who, after meeting with the President in September, pointed to setbacks eleven years after the case and the collapse of several lines of investigation. Both events reflect the Mexican state's limited openness to accountability on this issue and a worrying lack of action in the face of a persistent structural problem.

At the international level, in the context of the upcoming renegotiation of the USMCA scheduled for 2026, various organisations, collectives and activists, together with FUNDAR, issued a joint statement calling for the construction of a national and trinational agenda based on social, environmental and gender justice. The statement highlights the need to replace the logic of competition with solidarity among peoples and calls for the strengthening of local and regional alliances to consolidate a collective voice in the face of the treaty's purely commercial aims.

At the federal level, during the last quarter, there were some opportunities for dialogue between civil society organisations and legislative authorities, such as the working group led by EQUIS Justicia para las Mujeres, where recommendations were presented to <u>strengthen parity and inclusion</u> in local judicial powers ahead of the 2027 elections.

At the state level, the organisation Fin de la Esclavitud A.C. collaborated with the Jalisco government on an <u>international strategy against human trafficking</u> in preparation for the 2026 World Cup. This case exemplifies multisectoral cooperation efforts in the face of an event with a high global impact.

Meanwhile, the Espacio OSC collective launched the <u>Protect Dignity</u> campaign, accompanied by a microsite to consult and monitor regulations protecting human rights defenders and journalists. The initiative was presented together with multilateral organisations, the French Embassy, various CSOs and representatives of the federal and state governments. These examples show that, despite tensions, there are still opportunities for dialogue and collaboration between civil society and the state.



Together, these three processes—judicial, constitutional protection, and electoral—outline a period of redefinition of the balance of powers that will test the state's ability to maintain an open, transparent, and responsive relationship with its citizens.

## 5. Political Culture and Public Discourses on Civil Society

For this principle, although this year's country report documented the government's official strategy and narrative towards CSOs, communication from the "mañanera" (morning press conference) is less confrontational than that of the previous administration. However, in August, the Presidency discredited the march against medicine shortages, arguing that it was organised by the partisan opposition. The organisation Nariz Roja pointed out that such statements seek to divert attention from the real urgency and problems that various organisations and parents were highlighting in response to this serious situation, which has yet to find a definitive solution.

In contrast, the Simone de Beauvoir Institute (ILSB) has found opportunities for <u>collaboration</u> <u>and agreements</u> with the government on issues of gender awareness and care. This is reflected in the official narrative, which boasts a feminist vocation, and in the fact that programmatically it is the only area within the National Development Plan 2025-2030 where the participation of CSOs is contemplated.

It is important to monitor these channels, because although there is openness towards organisations linked to the gender agenda, this scenario does not extend uniformly to other CSOs or to critical and structural demands. A diverse sector of organisations questions whether these strategies have long-term infrastructure and budget, or whether they respond only to fulfilling the programmatic agenda.

On the other hand, although a single media survey has limitations, it is noteworthy that, according to El Financiero, 70% of citizens consider that freedom of expression is guaranteed in Mexico. Looking at the results in detail, we see that those who show affinity with the ruling party are the most likely to perceive full freedom of expression, while those who consider themselves non-partisan or supporters of other parties question it.

Even so, this result is surprising considering the <u>multiple documented cases</u> of public officials, such as senators and governors, who have demanded apologies from those expressing themselves on social media, as well as the proposed <u>law to punish mockery of congressmen</u>, which was rejected even by pro-government legislators.

The above events allow us to trace public perception and official narratives, which are essential for anticipating possible changes and assessing the climate of discourse towards CSOs.

#### 6. Access to a secure digital environment

During the last four months, Mexico has faced a significant deterioration in digital rights and privacy, marked by the *fast-track* approval of <u>a package of laws</u> that expands the government's surveillance powers, as we have already mentioned in the country focus report.

Added to this scenario are the <u>reforms to the Federal Tax Code</u>, which grant the Tax Administration Service (SAT) unlimited, real-time access to all digital platforms operating in the country. Although the argument is to strengthen tax collection and combat evasion, these measures constitute a system of control with the capacity for constant monitoring of



individuals, CSOs and companies, without effective mechanisms or guarantees for the protection of personal data.

This digital hyper-surveillance violates fundamental rights such as privacy and freedom of expression, in addition to contravening international commitments made by Mexico in the area of data protection and digital governance.

In September of this year, <u>a definitive suspension</u> was granted <u>in favour of Article 19</u>, through an amparo trial, where the ruling recognises that the application of the decrees that make up this system of mass surveillance without democratic controls could cause serious damage to human rights. The suspension obliges the authorities to refrain from applying provisions to Article 19 that affect the right to privacy, personal data protection, honour, freedom of expression and legal certainty.

Similarly, R3D: Red en Defensa de los Derechos Digitales (Network in Defence of Digital Rights) filed a series of amparo lawsuits against the reforms that consolidate this surveillance architecture. The challenges question the creation of the *Central Intelligence Platform*, the mandatory use of biometric CURP for public and private procedures, and the powers granted to the Armed Forces to carry out intelligence work under national security assumptions.

The appeals for legal protection and the ruling in favour of Article 19 highlight the importance of these defence tools in the face of acts of authority that violate fundamental rights, as well as the risk posed by recent initiatives to weaken them through reforms to the Amparo Law.

Furthermore, the organisation **Social TIC** has documented in its series "The Dark Side of Latin American Infoactivism" 2019 - 2024 how anti-rights groups have strengthened their presence and sophisticated their tactics in digital spaces, using communication, disinformation and manipulation strategies. Based on this research, the guide "Typology of anti-rights tactics in the digital space" was developed, with the aim of identifying and understanding the methods used by these groups in order to design mitigation actions and strategic responses to counteract their impact.

Such tools are particularly valuable given that digital attacks employ rapidly evolving tactics and represent an important resource for protecting the work of CSOs and digital activism in increasingly hostile environments.

#### Challenges and Opportunities

The main challenges for the enabling environment for civil society over the coming year focus on dialogue, participation and accountability with the federal government. It will be crucial to monitor processes such as electoral reform, scheduled for discussion in early 2026, as well as the renewal of the Supreme Court and the implementation of the reform of the Amparo Law, issues that will be under scrutiny by activists, citizens and organisations seeking to guarantee effective access to justice and the defence of rights.

The activism landscape will also demand priority attention. The crisis of disappearances, organised crime's control of territory, the hosting of the World Cup, and the renegotiation of the USMCA in 2026 in Mexico could directly impact the exercise of fundamental rights and the safety of those who defend environmental and social causes.

Another relevant issue will be to observe how funding is reconfigured after almost a year of the suspension of USAID resources, especially for organisations dedicated to human rights, democracy, transparency, and accountability. At the same time, the digital space will undergo significant changes: although there is no evidence of explicit censorship or massive violations



of digital security, new hyper-surveillance laws will begin to have tangible effects on online freedom and privacy.

Among the opportunities, the possibility of strengthening collaboration between civil society and local governments stands out, where greater levels of openness and even the existence of state and municipal funds can be observed. At the national level, the gender agenda promoted by the federal government could open up spaces to position cross-cutting and issues promoted by CSOs. Finally, dialogue on the legal framework and financial transparency with authorities such as the FATF, the SHCP and the UIF represents an opportunity to relax administrative requirements and strengthen the sustainability of the sector.

The year ends with a picture of strong tensions for the enabling environment in Mexico, but also with windows of opportunity at the local level and in certain areas of the federal agenda.

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