EU SEE

SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Tunisia

Country Focus Report

2025

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EU SEE SUPPORTING AN ENABLING ENVIRONMENT FOR CIVIL SOCIETY

A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the six principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

Brief Overview of the Country Context

This Country Focus Report refers to the events of the year 2025. Tunisia has been a republic since independence. Following the constitutional referendum of 25 July 2022, the new Constitution entered into force on 16 August 2022, establishing a highly centralised presidential system that consolidates authority within the executive branch. Although the Constitution formally guarantees freedom of association, peaceful assembly, expression, opinion, and judicial safeguards, these rights are not effectively upheld in practice.

Civic space has undergone profound regression since the entrenchment of the current autocratic order. It has deteriorated sharply, shifting from “obstructed” to “repressed” in the CIVICUS Monitor. Government-aligned narratives increasingly dominate the public sphere, while the number of prisoners of conscience has risen substantially—particularly among journalists, politicians, lawyers, and human rights defenders. According to Human Rights Watch, as of January 2025 more than 80 individuals remained detained for exercising fundamental freedoms, including participation in peaceful protests and political activism. Freedoms of expression, opinion, the media, association, and peaceful assembly—gains secured and exercised since the 2011 revolution—are no longer guaranteed. Political pluralism, which characterised the national landscape until 2021, has been severely undermined.

The media environment is now dominated by outlets aligned with the government, operating within a climate of surveillance and intimidation directed at journalists, activists, and commentators. Key institutional counterweights and regulatory bodies have been dissolved and/or suspended. The credibility of the Independent High Authority for Elections (ISIE) has been significantly eroded since its members became presidential appointees rather than being selected by Parliament, as was the case from 2011 to 2019. The audiovisual regulatory authority (HAICA) has seen its activities frozen. Several potential presidential candidates have been excluded, prosecuted, or imprisoned, paving the way for elections shaped to favour a single political trajectory.

Executive power has become heavily concentrated, marginalising citizens from meaningful participation and reducing public consultation to a symbolic process. The online environment has been further constrained by Decree-Law 54/2022 on Cybercrime, which criminalises so-called “false news”, imposes severe penalties, and enables extensive surveillance. These provisions have been widely criticised by international human rights organisations.

Despite these mounting pressures—including restrictive legislation on associations, an increasingly subordinated judiciary, and an assertive security apparatus—Tunisian civil

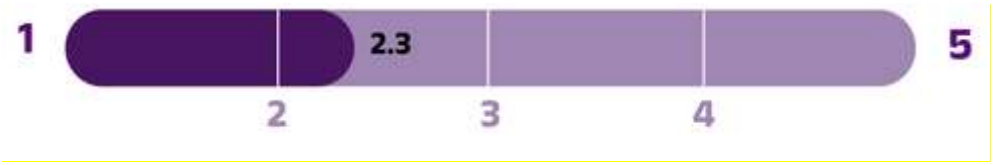
society continues to demonstrate resilience. Throughout 2025, organisations remained active under difficult conditions, persistently exposing violations despite recurrent smear campaigns, administrative suspensions, judicial harassment, and threats of custodial sentences targeting civil society actors. These restrictions are neither isolated nor incidental. Rather, they form part of a deliberate strategy by the executive to silence dissenting voices and suppress calls for the restoration of Tunisia's democratic transition. The sections that follow examine the principal obstacles affecting civic space and the consolidation of the rule of law in Tunisia.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score:[1]



Tunisia's civic space in 2025 was marked by a widening gap between constitutional guarantees and restrictive state practice. Freedom of association, though formally protected, has been eroded by growing executive interference, including NGO suspensions, pressure on trade unions, and reprisals against organisations supporting migrants and other marginalised groups. The right to peaceful assembly is similarly undermined: outdated legislation, an almost permanent state of emergency, and broad discretionary powers allow authorities to ban, disperse or criminalise demonstrations, often accompanied by arrests, procedural violations and police violence. Freedom of expression faces the most severe regression, driven by Decree-Law 54 and expansive anti-terror provisions that criminalise dissent. Journalists, activists and lawyers have faced prosecutions, imprisonment and escalating attacks, fostering widespread self-censorship. Across all three freedoms, state actions disproportionately harm organisations representing vulnerable communities, revealing a profound contradiction between Tunisia's constitutional commitments and the lived reality of civil society actors.

1.1 | Freedom of Association

Freedom of association in Tunisia remains constitutionally guaranteed yet increasingly undermined in practice. The 2022 Constitution, Article 40 affirms the right to establish political parties, unions and associations, albeit subject to a broad limitations clause permitting restrictions "by law" for reasons of public security, defence or health. Complementing these

[1] *This is a rebased score derived from the CIVICUS Monitor rating published in December 2025.*

constitutional provisions, Decree-Law No. 2011-88 historically provided an enabling framework for civil society, safeguarding advocacy activities and requiring only notification for registration rather than prior authorisation. However, legislative trends, including a 2023 draft bill proposing authorisation requirements and expanded administrative oversight, signal a shift towards restrictive governance. These developments, combined with the executive's expansive interpretation of constitutional limitations, have facilitated a deliberate contraction of civic space.

In 2025, this erosion manifested through systematic interference with civil society organisations (CSOs). Authorities suspended numerous prominent NGOs—including women's rights and anti-torture groups such as ATFD and OMCT-Tunis—citing opaque allegations of foreign funding. Trade union freedoms were similarly compromised, with mounting pressure on the General Union of Tunisian Workers (UGTT) prompting calls for a nationwide strike. More than 600 associations and NGOs are threatened with permanent dissolution. Organisations supporting migrants and refugees faced the harshest reprisals: the Tunisian Council for Refugees was forcibly closed, its accounts frozen, and staff prosecuted for assisting asylum seekers—two were convicted and later released. In addition, human rights defenders have been threatened and/or arrested, such as Ayachi Hammami and Mohamed Najib Chebbi. These measures, reinforced by persistent administrative obstacles, have created a chilling environment for civic engagement.

The impact of these restrictions is uneven across civil society. Groups advocating for migrants, women, and detainees—already serving marginalised constituencies—bear disproportionate harm, losing critical capacity to deliver humanitarian aid, legal assistance and protection services. Trade unions, representing precarious workers, encounter escalating barriers to collective bargaining and mobilisation. While constitutional and legislative texts ostensibly uphold freedom of association, their application in 2025 reveals a stark divergence between formal guarantees and lived realities, with executive practices eroding pluralism and silencing dissent. This trajectory underscores the fragility of Tunisia's civic space and the urgent need to reconcile domestic law with international standards to protect the autonomy and diversity of civil society actors.

1.2 | Freedom of Peaceful Assembly

Freedom of peaceful assembly and demonstration is entrenched in Tunisia's constitutional framework—most notably in Article 42 of the 2022 Constitution—yet remains heavily constrained by legislative and administrative practices inherited from the previous authoritarian regime. Central to this is Law No 69-4 of 24 January 1969, regulating public meetings, processions, demonstrations and gatherings under an authorisation regime, which overrides the spirit of constitutional guarantees. While Article 1 of the law declares public meetings "free," subsequent provisions introduce restrictive conditions. Article 2 requires that organisers must submit detailed declarations—naming event purpose, time and venue—three to fifteen days in advance, along with formal signatures and approval from governorates or police—even peaceful assemblies are subject to cancellation or dispersal for vaguely-defined threats to public order. For instance, Article 7 empowers authorities to prohibit any meeting deemed likely to disturb public order; and Articles 15–22 authorise dispersal by force, escalating to the use of firearms. These provisions, combined with Tunisia's near-permanent state of emergency since 2015, grant sweeping discretion to security forces, undermining international obligations under the African Charter.

Since the 2015 imposition of a de facto permanent state of emergency, authorities have routinely invoked this legislation to restrict civic space. The blocking of a solidarity gathering on 9 May 2025 in Tunis, observing the year-long detention of journalist Mourad Zeghidi, exemplifies such administrative interference. The event was banned last minute, forcing relocation plans to collapse. Similarly, environmental and community protests in Gabès in October 2025—demanding responses to toxic pollution from the Tunisian Chemical Group—were met with mass arrests. Over 150 people were detained, including minors, many denied legal representation in violation of Article 13 bis of the Code of Criminal Procedure. The authorities pressed charges of "disturbing public order" and transferred some peaceful protesters to anti-terrorism divisions.

The violent arrest and alleged torture of activist Mohamed Ali Rtimi, a member of the Association tunisienne pour la justice et l'égalité (DAMJ), an association promoting justice, equality and inclusion for the LGBTQIA+ community in Tunisia, during a peaceful sit-in orchestrated by the "Stop Pollution" movement in May 2025 further highlights the state's repressive tactics. He was accused of "violence against a public official" under Articles 79 and 127 of the Penal Code and held without counsel. This prompted condemnation from the International Commission of Jurists, the Observatory for the Protection of Human Rights Defenders, and OMCT, who affirmed multiple violations of his rights.

These events illustrate a legal environment in which constitutional assurances are undermined by anachronistic laws and a relentless state of emergency. The discretionary power wielded by the executive allows authorities to ban, disperse or criminalise otherwise peaceful assemblies, accompanied by procedural breaches like denial of legal counsel and police violence. This has had a chilling effect on civic engagement, particularly among marginalised communities. Environmental justice movements—especially in polluted, underserved regions such as Gabès—face sharp repression, including arrest of minors and deployment of anti-terrorism charges. Journalists and media professionals attempting symbolic protests encounter arbitrary blockages. By sustaining a framework of excessive administrative and legal controls, Tunisia severely undercuts the right to peaceful assembly. Although this right is guaranteed on paper, 2025 saw repeated infringements that disproportionately impacted protest groups representing journalists, environmental activists and other marginalised citizens, signalling a profound contradiction between formal law and lived experience.

1.3 | Freedom of Expression

Freedom of expression, once celebrated as the hallmark of Tunisia's 2011 revolution, is now under severe strain. While it remains enshrined in Article 37 of the 2022 Constitution, which guarantees the right to express opinions, and publish and access information, and Article 55 which provides that restrictions on freedom of expression must meet the test of legality, legitimacy, necessity, and proportionality, this protection is undermined by restrictive legislation. Chief among these is Decree-Law 54/2022 on combating crimes related to information and communication systems, ostensibly aimed at combating cybercrime, which criminalises "false information" under Article 24 and imposes harsh penalties for online speech.

The 2015 Anti-Terrorism Law further expands state discretion, enabling prosecutions for vaguely defined offences linked to "terrorist intent." These provisions have become primary tools for silencing dissent and shrinking civic space. Civil society actors, including organisations, associations, activists and journalists, operate in an environment where public expression is either restricted by the application of repressive legislative measures or inhibited by self-censorship induced by the threat of reprisals.

In practice, 2025 saw an alarming escalation in repression. At least ten journalists were sentenced under Decree 54 or anti-terror laws, six of whom served prison terms. Cases include Mohamed Boughaleb, Borhane Bssaïes, Mourad Zeghidi, Chadha Haj Mbarek and Sonia Dahmani (acquitted in November 2025). A suspended sentence was handed down to Ghassen Ben Khlifa and two sentences in absentia were imposed on Walid El Mejri and Hedi Redaoui. The National Syndicate of Tunisian Journalists (SNJT) also recorded 167 attacks on media professionals between April 2024 and April 2025, including physical assaults, censorship, and judicial harassment. In October 2025, Ahmed Souab, a former judge and human rights lawyer, was sentenced to five years in prison for criticising the "Conspiracy Case," prosecuted under both Decree 54 and anti-terror provisions and charged with offences such as "spreading false information" and "forming a terrorist conspiracy" after publicly criticising judicial interference.

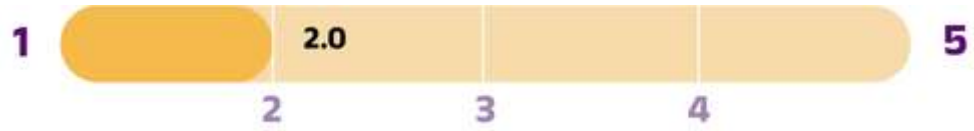
The media landscape has grown increasingly polarised. State-controlled outlets and some private broadcasters amplify pro-government narratives, while independent and community media face financial, technical, and regulatory constraints. Digital spaces, once a refuge for free debate, are now heavily policed through Decree 54, fostering widespread self-censorship. This climate disproportionately affects marginalised voices—women journalists, minority rights advocates, and grassroots activists—whose work often challenges entrenched power structures. Community radio stations, vital for rural and underserved populations, struggle under mounting restrictions, further silencing vulnerable groups.

These developments reveal a stark contradiction between constitutional guarantees and lived realities. By weaponising cybercrime and anti-terror laws, authorities have curtailed pluralism and eroded the enabling environment for civil society. Organisations advocating for gender equality, migrant rights, and regional justice face heightened risk of prosecution, undermining their ability to serve marginalised communities. To reverse this trajectory, Tunisia must repeal or amend Decree 54, narrow the scope of anti-terror legislation, and strengthen protections for journalists and CSOs. Without such reforms, the revolutionary gains of 2011 risk being permanently dismantled.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score:



In Tunisia, administrative practice, operational pressures, and weakened institutional safeguards collectively undermine the autonomy and functioning of civil society. Although the legal framework nominally provides a declaratory registration regime, its implementation has shifted towards a discretionary and opaque administrative process that obstructs organisations' ability to obtain legal personality, thereby constraining their fundamental capacity to operate. This administrative obstruction intersects with an increasingly restrictive operational environment marked by state interference, coercive investigations, and a climate of fear that compels organisations to limit their public engagement. Compounding these pressures, the erosion of judicial and procedural guarantees has weakened protection against arbitrary sanctions, enabling security-driven oversight and intrusive monitoring practices that threaten organisational independence. Together, these dynamics illustrate a systemic contraction of civic space in which legal ambiguity, administrative arbitrariness, and securitised governance practices collectively diminish the resilience, legitimacy, and effectiveness of civil society actors in Tunisia.

2.1 | Registration

In Tunisia, Decree-Law No. 2011-88 establishes a declaratory regime in principle. The registration process is formally conducted through a simple declaration (notification) to the Secretary-General of the Government, submitted by registered mail (cost £1), followed by registration in the national company register (cost £17) and publication in the Official Journal (cost £50). In theory, this creates a more accessible and transparent pathway than an authorisation-based regime, thereby reducing bureaucratic barriers to association formation.

In practice, however, this right is no longer effectively guaranteed. The Directorate-General for Associations exercises extensive discretionary power, frequently requesting additional documentation, demanding statutory amendments, or withholding acknowledgement of

receipt without justification. The absence of this acknowledgement prevents associations from completing their legal status or obtaining legal personality, which in turn blocks them from opening bank accounts, entering into contracts, or undertaking operational activities.

This discretionary environment has a materially negative impact on the enabling environment for civil society. It generates unpredictability, administrative opacity and procedural delays, discouraging new actors from entering the civic space. Even well-structured organisations experience barriers that undermine their legal security. The combination of undefined processing timelines, unlawful administrative requirements, and lack of transparency creates a systemic chilling effect, weakening organisational resilience and shrinking the diversity of actors within civil society.

2.2 | Operational Environment

The operational environment for CSOs in Tunisia has deteriorated significantly. The closing civic space is reflected in the official delegitimisation of civil society, the breakdown of institutional cooperation, reduced access to funding, and increased executive interference—factors that collectively push organisations toward self-censorship and weaken their public engagement.

A 2023 bill proposing the replacement of Decree 88 with a more restrictive legal framework marks a potential structural regression, embedding restrictive practices into law. CSOs also face growing crackdown by security forces and regional authorities, particularly outside major urban centres. The proliferation of investigations, administrative controls, and coercive measures further exacerbates the climate of strong self-censorship, limiting the ability of organisations to act freely to defend their mandates.

Fourteen Tunisian and international organisations have received court orders requiring them to suspend their activities for 30 days and/or freeze their assets for the duration of the investigations targeting them. Affected CSOs include Nawat, Aswat Nissa, the Tunisian Forum for Economic and Social Rights (FTDES), the Tunisian Association of Democratic Women (ATFD) and the World Organisation Against Torture (OMCT). Activists working in specific areas such as migration have been arrested and/or imprisoned, including Mustapha Djemali and Abderrazek Krimi of the Tunisian Council for Refugees, each sentenced to two years in prison, Saadia Mosbah, president of Mnemty Sherifa Riahi, Iyadh Bousselmi and Mohamed Joô of Terre d'asile, and Saloua Grissa, president of the association Droit à la différence.

These developments produce severe negative impacts on the enabling environment. They undermine trust between the state and civil society, erode the perceived legitimacy of CSOs, and significantly impede their capacity to provide essential services, advocate for rights, or participate in policymaking. The rise in coercive measures promotes defensive organisational behaviour, curtails public participation, and deepens regional disparities in civic freedoms. The cumulative effect is a contraction of civic space, reduced organisational autonomy, and heightened vulnerability of rights-based actors.

2.3 | Protection from Interference

Although Decree-Law 2011-88 provides judicial guarantees against arbitrary dissolution, the grounds for sanctions—such as requirements for plurality and transparency—are broadly defined, leaving room for expansive administrative or judicial interpretation. Chapter VIII sets out a graduated system of punitive measures, from formal notices to full dissolution. In practice, however, the suspension of activities for 14 organisations has raised concerns about the impartiality and independence of judicial mechanisms, particularly given the absence of publicly disclosed legal grounds.

The limited effectiveness of appeals reflects the structural fragility of judicial protections. CSOs face harassment from security forces, including unannounced visits, staff questioning, and the withholding of crucial administrative documents such as acknowledgements of receipt or confirmations of statutory changes. These omissions place organisations at risk of being wrongly labelled as non-compliant, thereby exposing them to further sanctions.

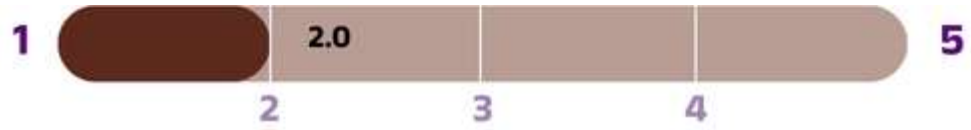
Since 2024, the rise in audits, intrusive inspections, and legally unsupported documentary demands has intensified, contributing to a climate of intimidation. These developments signify a substantial erosion of the protective guarantees intended by Decree-Law 2011-88. The framework, once designed to safeguard associative freedom, is increasingly repurposed as a tool of administrative and security interference.

The impact on the enabling environment is profoundly negative: legal uncertainty increases organisational vulnerability; arbitrary enforcement weakens trust in state institutions; and intrusive oversight disrupts operational continuity. Together, these dynamics undermine the independence, effectiveness, and long-term sustainability of civil society organisations.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score:



Decree-Law No. 2011-88 provides a comparatively permissive framework for foreign funding—a long-time cornerstone of Tunisia's associative sector. The FATF grey-listing episode triggered tighter scrutiny of financial flows, but the situation later stabilised as procedural controls improved. Since 2021, however, a political discourse openly hostile to foreign funding has created uncertainty within the banking sector, prompting unilateral account closures and restrictive practices on international transfers. In a context where public funding is both scarce and complex, Tunisia no longer guarantees a basic premise of associative life: the security and continuity of legitimate financial partnerships. While the legal openness to foreign funding and earlier procedural improvements initially broadened access and predictability, hostile political rhetoric and growing banking risk-aversion have since re-politicised financing, undermined financial security, and increased volatility for CSOs.

3.1 | Accessibility of Resources

Decree-Law No. 2011-88 authorises foreign funding but prohibits receiving funds from states without diplomatic relations with Tunisia or from any state supporting those actors. In practice, enforcement has tightened: minor irregularities are increasingly treated as sanctionable, and international transfers face delays, repetitive requests for justification, and unexplained blockages. Administrative constraints—including bank-account closures, unjustified delays, intrusive checks (e.g., by BILEF), and summonses (e.g., by the El Gorjani criminal investigation department)—undermine CSOs' autonomy and expose them to harassment.

Public funding is rare, onerous, and vulnerable to clientelist practices; certain themes (e.g., public policy, migration, human rights, prisons) are effectively barred from support. Access to foreign funds has become unstable amid a dominant political discourse that vilifies external financing, reflected in account freezes and banking restrictions. Access to information is also weak: Tunisia lacks an institutional portal to aggregate grant calls; the Jamaity website remains a non-official stop-gap.

The complex and technical procedures involved in calls for proposals require detailed financial documents, sophisticated logical frameworks and internal audit guarantees that often exceed the capacities of local structures.

Authorities also use the 2015 counter-terrorism and anti-money-laundering law to scrutinise CSO financing. Despite compliance with FATF recommendations, 'de-risking' by financial institutions has curtailed banking services and cross-border transfers. Taxation adds further complexity: while associations operating under Decree 88 fall outside corporation tax, many—especially local—organisations lack the human and technical capacity to navigate fiscal obligations and the exacting requirements of competitive calls (detailed budgets, log frames, audit assurances).

Decree 88's permissive stance continues to make foreign funding legally accessible, while non-institutional initiatives such as Jamaity help to partially bridge information gaps and support organisations navigating an otherwise fragmented funding landscape. At the same time, administrative over-reach, bank de-risking and opaque financial controls have rendered access to resources increasingly unpredictable, discouraging legitimate fundraising efforts and deterring potential new entrants to the civic space. These constraints are compounded by persistent capacity disparities and the absence of an institutional public grants portal, which collectively deepen inequalities between well-resourced organisations and local actors and, in turn, narrow the overall diversity and resilience of civil society.

3.2 | Effectiveness of Resources

International funding to Tunisia has declined, notably following the war in Ukraine and the war in Gaza, as resources are reallocated to humanitarian emergencies. Earlier policy shifts (e.g., under the Trump administration) also had lasting effects on funding flows. Domestically, authorities increasingly require institutional—or even state—collaboration as a condition for funding, often recasting CSOs as service providers while proscribing sensitive topics. Instability and policy uncertainty undermine multi-year planning, disrupt implementation, and complicate monitoring and evaluation. Amnesty International documents cases in which banks refused transfers, returned funds to donors, demanded account closures, or imposed procedures causing delays of up to ten weeks—resulting, in at least one instance, in an office closure.

Donor conditionalities further shape the landscape. Dependence on short-cycle projects encourages thematic drift toward funder priorities and, in some cases, pressures 'neutrality' that discourages advocacy—limiting efforts to address structural problems. Stringent reporting, auditing and compliance regimes strain organisational bandwidth, particularly among local CSOs with lean teams.

Conversely, recent repression and investigations launched against CSOs have prompted donors and partners to invest in capacity strengthening (administrative, financial, legal and tax compliance). Dedicated legal and financial support teams have been set up to assist civil society actors under pressure, bolstering compliance and risk management—albeit diverting time and resources from direct programme delivery. While expanded compliance support and legal assistance have strengthened organisational resilience, improved governance standards, and enhanced fiduciary risk controls, funding volatility, restrictive gate-keeping, and coercive banking practices simultaneously undermine programme continuity and effectiveness, with overbearing compliance demands and advocacy-averse incentives diluting civic voice and constraining systemic change.

3.3 | Sustainability of Resources

Financial autonomy within Tunisian civil society remains fragile. Domestic donations have declined alongside falling purchasing power; national funding is limited and selective; volunteering levels are low; and the prevailing projectised model prioritises short-term outputs over long-term institutional stability. Heavy reliance on external funding exposes CSOs to sudden shocks when donor priorities shift or pipelines stall. The Arab Reform Initiative notes that targeted, short-term funding cycles—typically two to three years—impede sustainable strategic planning. Administrative suspensions of some CSOs' activities further degrade stability.

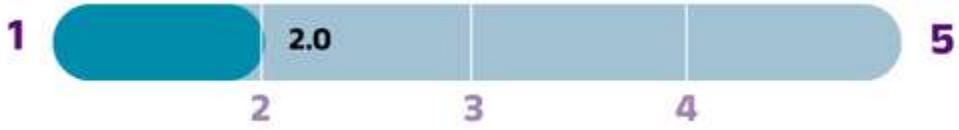
New avenues such as the *cha9a9a* crowdfunding platform exist but remain nascent. Geographic imbalances persist: funding and active associations are concentrated in larger cities (Tunis, Sousse, Sfax), while inland regions face sparse opportunities despite acute needs. Finally, when a CSO conducts commercial activities beyond its non-profit remit, it becomes liable for corporation tax, adding financial and compliance pressures.

While emerging crowdfunding tools and experiments in diversified revenue generation offer modest but meaningful avenues for greater financial autonomy, and short-term project cycles can deliver targeted gains within limited timeframes, the broader funding landscape remains deeply fragile. Short funding horizons, stark geographic disparities in resource distribution, and continuous exposure to external shocks undermine institutional continuity, making it difficult for organisations to retain talent, plan strategically, or maintain stable community relationships. These pressures collectively weaken the long-term resilience of civil society and ultimately compromise the sector's ability to deliver sustained, rights-based outcomes.

PRINCIPLE SCORE

4. Open and Responsive State

Score:



The Tunisian government's accessibility and responsiveness to civil society remain inconsistent and, increasingly, restrictive. Civil society actors are progressively excluded from meaningful cooperation and consultation processes, while the suspension of the national authority responsible for guaranteeing access to information has severely undermined transparency. Requests for information now routinely go unanswered, with no functioning appeal mechanism, and new legislation restricts communication between state institutions, the media, and civil society organisations. In this climate, the principles of open government—transparency, protection, and accountability—have become largely unattainable. This situation has a predominantly negative impact on the enabling environment: it reduces predictability, weakens institutional trust, and diminishes opportunities for civil society to contribute to public decision-making.

4.1 | Transparency

Under Decree 88/2011, civil society organisations are entitled to access information, assess institutional performance, and propose improvements. Although Tunisia adopted an advanced legal framework in 2016, Organic Law No. 2016-22, including the creation of a National Authority for Access to Information (INAI), recent years have seen a marked deterioration in practice. The dissolution of the INAI in August 2025 has made it impossible for CSOs or citizens to contest refusals of requests to access information, while the absence of sanctions for non-compliance and the lack of a unified system for classifying information further weaken institutional openness. These developments negatively affect the enabling environment by depriving CSOs of the information required to monitor public authorities, engage in evidence-based advocacy, and participate meaningfully in the policy cycle.

A further challenge arises from inconsistent and sometimes exclusively social-media-based information publication practices, which marginalise independent and private media and restrict the distribution of accurate information. Circular No. 19 of 10 December 2021 has entrenched a culture of communication control, obliging public officials to obtain approval

before communicating. This has resulted in delays, refusals, and an institutional reluctance to share information. Access requests are not always subject to a transparent processing mechanism and safeguards against unjustified refusals are rarely implemented. According to a publication by the INAI, the response rate to requests for access to information did not exceed 68% until August, compared to 82% in 2018, confirming a continuous decline since 2024. Between 2019 and 2020, the independent media outlet inkyfada submitted more than 100 requests for access to information, nearly 45% of which remained unanswered.

The decline in response rates to access-to-information requests, combined with the lack of enforcement mechanisms, confirms a broader regression. The slowing momentum around open-government reforms and the marginalisation of CSOs further illustrate how transparency has deteriorated. These dynamics cumulatively *erode public oversight*, reduce accountability incentives, and weaken the democratic role of civil society.

4.2 | Participation

Although Tunisia retains several legal frameworks designed to encourage public participation—including the Head of Government's Circular No. 31 of 2014, parliamentary rules of procedure, and the 2018 Organic Law on Local Authorities—implementation has effectively stalled. Consultation platforms have been suspended, civil society is excluded from local governance under the 2025 Organic Law on local, regional, and district councils, and parliamentary proceedings increasingly restrict access for both CSOs and the media. The dissolution of municipal councils, the exclusion of marginalised groups and low turnout in elections illustrate a marked decline in the transparency and inclusiveness of decision-making processes. These trends negatively impact the enabling environment by weakening mechanisms for inclusive policymaking and restricting opportunities for civil society to influence institutional reforms.

According to the UN e-government portal, Tunisia's E-Participation Index (EPI) is 0.4521, ranking it 99th out of 193 countries. Although Tunisia has a national e-participation portal designed to provide tools for public consultation, the submission of complaints or suggestions, and citizen participation, its implementation has been marginalised and is little known among Tunisian citizens because the process lacks guarantees and transparency, especially with the freezing of the INAI.

Several public commitments to citizen participation and "government transparency" have never progressed beyond the announcement stage and have produced no tangible results, clearly demonstrating the lack of feedback, justification, and transparency regarding the effective use of civil society contributions. As part of the reform of the education system, an online consultation was launched on the initiative of President Kaïs Saïed. However, no report has been published on the consultation page or communicated by the government. The website merely displays statistics on citizen participation in this consultation.

As a result, the participation of civil society actors in Tunisia remains largely superficial: although legal frameworks and formal platforms exist, notably within the Open Government Partnership (OGP) and Tunisian public action, in practice they have little real influence. Organisations are often excluded because of their orientation or their criticism of the government, which effectively limits equal access. Circular No. 19 of 10 December 2021 introduces a filter on communication between the media, CSOs and the Tunisian authorities, subject to approval by the executive. Only those close to the system have the right to gather information and communicate with ministries. Arrests and prosecutions of journalists have led part of the media sector to adopt practices of self-censorship or compliance with official

positions. According to ARI, the weakening of public debate spaces risks accentuating the depoliticisation of a large section of the population, as illustrated by the low turnout in recent elections.

This shrinking participatory space reduces pluralism, reinforces exclusion, and contributes to the depoliticisation of the population, thereby weakening civil society's ability to serve as a bridge between communities and the state.

4.3 | Accountability

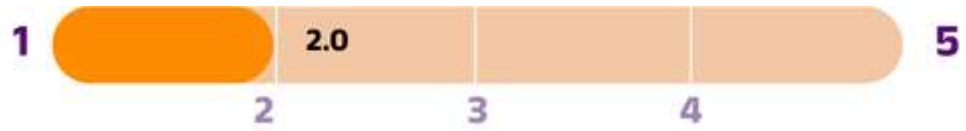
Public accountability mechanisms have weakened significantly due to declining judicial independence, selective implementation of administrative court rulings, and the suspension of key oversight bodies such as the National Anti-Corruption Authority (INLUCC). These gaps are compounded by reduced transparency and minimal participation in public debates, creating a governance environment where administrative decisions are difficult to contest and where the state operates with limited checks. Such weaknesses negatively affect the enabling environment by undermining predictability, exposing CSOs to arbitrary decisions, and reducing institutional responsiveness to citizens' rights and concerns.

In response, Tunisian civil society has increasingly turned to regional and international mechanisms for oversight and redress, including the UN's Universal Periodic Review, special procedures, and rapporteur submissions. While these international mechanisms offer alternative pathways for accountability—and therefore provide a positive albeit limited outlet for civil society advocacy—the absence of reliable national mechanisms severely restricts the practical influence of CSOs on public policy. Reliance on external channels can generate visibility and pressure, but it does not compensate for the fundamental erosion of domestic accountability structures. As a result, civil society's capacity to influence, monitor, and evaluate public policies remains constrained, diminishing its overall contribution to democratic governance.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score:



The current political regime in Tunisia is based on division. This binary view of things presents CSOs as adversaries of the President rather than partners. Exchanges between the government, parliament and part of the judiciary with CSOs remain rare and confined to fairly specific areas, often far removed from public affairs and fundamental freedoms. This demonisation of civic work has weakened it due to insufficient education and the absence of mechanisms for participation and dialogue, leaving room for either citizen disengagement or manipulation of public opinion. Vulnerable groups such as women, people with disabilities and sexual minorities struggle to find their place in the public sphere. They are either used in official discourse or completely sidelined. These stumbling blocks and drastic dynamics paralyse the impact and sustainability of civic work.

5.1 | Public Discourse and Constructive Dialogue on Civil Society

One of the characteristics of the executive's discourse is based on rhetoric of suspicion and institutional exclusion. It remains marked by recurring accusations of "foreign allegiance", smear campaigns and systematic questioning of the national loyalty of civil society actors. The President asserts that foreign funding of associations is *"an extension of foreign powers seeking to control the Tunisian people through their money*." Political discourse divides public opinion on the very existence of civil society through a climate of increasing criminalisation of social movements. The head of the executive branch was quick to label trade unionists as "traitors", human rights activists as "spies" and international solidarity as "interference in the country's internal affairs". The executive is not alone in this relentless pursuit, but is supported by a parliamentary majority that introduced the regressive bill on associations.

This relentless campaign is amplified by several mainstream media outlets, which repeat official statements and conduct stigmatisation campaigns against organisations perceived as critical of the government.

In addition, smear campaigns - often coordinated and based on falsified information, orchestrated by pro-government social media accounts - relay and amplify an official narrative presenting associations as "foreign agents" or "destabilising" actors. At the same time, spaces for dialogue have virtually disappeared: there is no structured consultation between civil society, experts, trade unionists and politicians to accompany the drafting of laws, and parliamentary participation by CSOs has been abolished since the 2023 circular.

5.2 | Perception of Civil Society and Civic Engagement

"*Tunisians clearly no longer have confidence in their political parties, trade unions and associations. This is a great pity! A country without intermediary bodies, without community life, without negotiation on the equitable sharing of wealth and the fair distribution of the tax burden, is a country that is necessarily constrained, frozen, and plagued by extreme passions and unresolved resentments." Habib Touhami*

A study conducted in 2024 shows that the voluntary sector in Tunisia contributed at least 1.7% of gross domestic product and generated more than 38,000 direct jobs. Despite this impact on employability and the solidarity economy in Tunisia, it faces hegemonic behaviour from the rest of society. This is mainly due to a lack of civic education and relentless political hostility towards civic work. According to the 2024 Arab Barometer, trust in civil society organisations remains relatively moderate. Four out of ten Tunisians say they trust them. However, this level marks an improvement over 2021, when only 35 per cent expressed the same opinion, an increase of 11 points since 2019. In fact, current levels are reaching a peak comparable to that recorded after the Jasmine Revolution, particularly in 2013, when 39 per cent of citizens expressed their trust.

Interest in politics remains low. Only 24% of citizens say they are interested or very interested in politics. This represents a 7-point drop from 2021, a year marked by major political changes in July. Interest in politics has thus returned to one of its lowest levels since the revolution, equivalent to that observed in 2019 and well below the peak of 46% reached in 2013. Young Tunisians are particularly detached from the political process. Only 13% of those aged 18 to 29 say they are interested or very interested in politics, compared to 29% of those aged 30 and over. Somewhat surprisingly, interest in politics does not vary according to level of education: university graduates and those without a degree show comparable levels of interest. On the other hand, men report being significantly more interested than women, 30% versus 18% respectively.

5.3 | Civic Equality and Inclusion

Article 19 of the 2022 Constitution prohibits all forms of discrimination, while Article 23 reiterates this principle by linking it to the principle of equality. Tunisia has also ratified several international texts on non-discrimination, including CEDAW and the United Nations Convention on the Rights of Persons with Disabilities (CRPD) and its Optional Protocol. Tunisia has adopted Organic Law No. 2018-50 on the elimination of all forms of racial discrimination and Organic Law No. 2017-58 of 11 August 2017 on the elimination of violence against women. Meanwhile, the new electoral law introduced in 2022 by the President eliminated the principle of gender parity in elected assemblies in Tunisia.

The rate of women's representation in Parliament stands at 15 per cent, a level not seen in Tunisia since 2011. Although two women have been appointed to the position of head of government, these appointments are based more on political considerations than on competence or a state strategy to promote women's access to positions of responsibility.

Under President Kaïs Saïed, Tunisia has the highest number of women in prison in its history, including politicians, lawyers, journalists, activists and ordinary citizens. According to Nabila Hamza, a member of the executive board of the Tunisian Association of Democratic Women (ATFD), "this is an unprecedented situation for women." In addition, two feminist organisations, the ATFD and Asswat Nissa, have been subjected to one-month administrative suspensions, decided on the basis of arbitrary measures and in contradiction with the legal guarantees applicable to freedom of association.

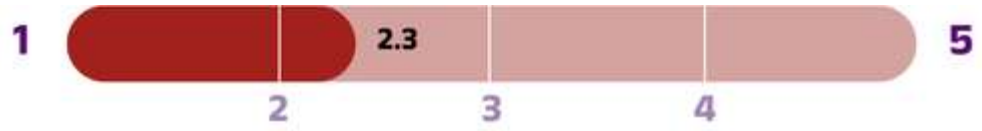
It is clear that persons with disabilities, women, sexual and gender minorities and other vulnerable groups face structural barriers that limit their political participation and access to public decision-making mechanisms. Furthermore, increased repression of human rights defenders, migrants, refugees and minorities reinforces a climate of legal and social insecurity that limits their ability to exercise their civil rights on an equal footing. Moreover, Kaïs Saïed's speech gave carte blanche to violence against migrants. According to FTDES, 77% of migrants say they have been victims of one or more forms of violence: "Those interviewed believe that Tunisians would not be in favour of a mass regularisation of the situation of migrants due to (in order): manipulation of public opinion and misinformation in the media and on social networks, the economic situation in Tunisia and, finally, racism."

Most CSOs working to protect irregular migrants have had their activities suspended, either as a result of pressure and harassment by the authorities, forcing them to cease operations, or due to the imprisonment of their leaders, thus paralysing their institutional functioning. Sexual and gender minorities find themselves in a situation of structural vulnerability, criminalised by the penal code and the Tunisian legal system, which does not provide any specific protective provisions for LGBTQ+ people. This normative exclusion, combined with widespread social hostility, leads to increased marginalisation of these groups and substantially restricts their access to mechanisms for civic participation and public debate. Although some forms of social tolerance exist and several associations defending the rights of sexual and gender minorities are active in Tunisia, these groups remain far from protected. They remain exposed to persistent stereotyping, structural stigmatisation and institutional hostility, including cases of police harassment, arbitrary summonses, unprosecuted assaults and criminal prosecutions, as well as administrative obstacles preventing them from holding public activities.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score:



Tunisia was the first Arab and African country to host the Internet Governance Summit in 2005. Organic Law No. 2004-63 of 27 July 2004 on the protection of personal data was innovative. Despite this, digitalisation has not really evolved. Public administrations continue to work in a traditional, slow and complex manner. Although internet access has improved significantly in Tunisia, it is concentrated in large cities to the detriment of rural areas. Restrictions on internet use, surveillance practices and ambiguous cybercrime laws raise concerns about the shrinking of online civic space. The rise of Artificial Intelligence (AI) and other technologies depends on digital education, which is struggling to take hold and become widespread in Tunisia, creating further challenges and obstacles to overcome in terms of civic engagement in the age of technology .

6.1 | Digital Rights and Freedoms

According to the Internet Society, Tunisia has an overall score of 49% for Internet resilience, indicating an average capacity to withstand unexpected outages or disruptions to normal network operation. According to United Nations classifications, Tunisia is classified as a lower middle-income country. The Internet Society gives it an Internet resilience score of 49 out of 100, reflecting the country's average ability to cope with disruptions, based on criteria related to infrastructure, security, performance and market conditions. Furthermore, Freedom House's Freedom on the Net index ranks Tunisia among "partly free" countries, with an overall score of 44 out of 100 for fundamental freedoms and a specific score of 59 out of 100 for internet freedom. The latter result breaks down into 17 out of 25 for access barriers, 24 out of 35 for content restrictions, and 18 out of 40 for user rights violations, indicating persistent restrictions on access, content control, and digital rights protection. The Tunisian authorities do not resort to mass Internet shutdowns or widespread blocking of social networks during protests or elections. Repression is less about technical shutdowns and more about repressive information laws, arrests and prosecutions.

Decree-Law No. 54 of 2022 on cybercrime, and in particular Article 24, has been widely criticised for its vague wording of offences and the heavy penalties it provides for, making it an instrument of repression of online freedom of expression rather than a tool for protecting digital users. Its text makes it possible to criminalise criticism of public officials and extend the state's surveillance capabilities at the expense of the right to privacy and freedom of expression in the digital space. Twenty-four legal cases have been brought under Decree 54 against journalists and media professionals in Tunisia, including journalist Chadha Haj Mbarek, journalist and activist Ghassen Ben Khelifa, and columnist and lawyer Sonia Dahmani. One thousand four hundred young people are in prison or subject to arrest warrants because of this decree. This has prompted MPs to raise the alarm about the need to reform this decree in the face of the Ministry of Justice's total denial of its seriousness and scope. There is an obsolete criminal framework, including a penal code dating from 1913 and scattered laws such as Article 83 of the Telecommunications Code, several provisions of which, obsolete or general in nature, can be widely used against opponents and critical internet users.

According to the Freedom on the Net report, systematic internet censorship remains "rare" in Tunisia: major platforms such as Facebook, YouTube and X (formerly Twitter) remain accessible, suggesting that there is no widespread or official blocking of these services. That said, according to the Arab Reform Initiative report on online disinformation in Tunisia, social media plays a crucial role in spreading manipulative narratives. This further illustrates the use of platforms as a lever of influence rather than simply a tool of state censorship, especially in the absence of real online protection guarantees offered by groups such as META or X.

6.2 | Digital Security and Privacy

With the closure of the national information access authority and the suspension of the National Personal Data Protection Authority for possible reforms, the legal and institutional framework no longer guarantees privacy in the digital age. The Tunisian legal framework contains provisions that compromise the protection of encryption and digital privacy. Although no evidence of cyber attacks or the use of spyware against CSOs has been reported, the 2001 Telecommunications Code prohibits the unauthorised use of encryption and provides for penalties of up to five years' imprisonment, while the purchase of a SIM card requires the transmission of personal data, and access providers must retain detailed identification information. The Technical Telecommunications Agency has extensive powers to access data in criminal investigations. Decree-Law 2022-54 further extends these powers by authorising the seizure of devices, access to all stored data and the interception of communications on the sole decision of the public prosecutor or investigating judge, without sufficient procedural guarantees or remedies.

Facebook continues to play a central role in Tunisia, as it is the most widely used social network and a major forum for political debate. There is evidence of increasing manipulation of social media, through troll accounts steering the political agenda or fake accounts creating an artificial illusion of popularity, as was the case in the smear campaign against politician Abir Moussi. These dynamics of disinformation and manipulation raise serious concerns about the future of democratic debate in a digital environment that is mistakenly perceived in Tunisia as a true reflection of reality.

Three structural programmes for the digitisation of public services have been adopted, namely the biometric identity card, the Mobile ID system and the subsidy compensation platform. Although presented as tools for administrative modernisation, these mechanisms raise significant concerns about privacy, personal data protection and digital security, as clearly

demonstrated in reports by Smex and Access Now. Their design, adoption and implementation took place without sufficient guarantees of transparency or genuine consultation with civil society, exposing citizens to increased risks of violations of their fundamental rights.

6.3 | Digital Accessibility

Internet access in Tunisia is relatively smooth, with an access rate of nearly 80%, with DataReportal placing internet penetration at 84.3 percent in 2025, broad mobile coverage, and costs considered affordable, allowing civil society organisations to operate online without major restrictions. Basic digital skills are also high, with Tunisia ranking around 71% in ICT proficiency, one of the highest rates in the MENA region. With this foundation, the majority of civil society actors can effectively use digital tools and interpret online information.

According to the Internet Society, the Internet in Tunisia is more resilient than the average for North African countries and is among the best performing on the continent. The country ranks first in North Africa for "infrastructure," which measures the availability and robustness of connectivity networks. It also ranks 29th in Africa for "performance," which assesses the network's ability to provide users with stable, continuous, and reliable service.

In Tunisia, access to the Internet continues to reflect pronounced regional inequalities. A 2025 report by the National Institute of Statistics (INS) shows that households in rural areas remain significantly disadvantaged compared with those in urban settings. According to the findings, 59.6% of all households in Tunisia lack an Internet connection, a figure that rises dramatically to 92.8% in rural regions. A similar pattern emerges with computer ownership: 73.9% of households nationwide do not possess a computer, and the rate reaches 90.2% in rural areas, underscoring a deep digital divide in basic technological access. These disparities translate into stark geographical contrasts. The governorates of Tunis (59.7%), Ariana (57.4%), Ben Arous (56.1%), Monastir (52.8%) and Sousse (50.3%) form Tunisia's digital core, displaying comparatively high connectivity. In contrast, regions such as Sidi Bouzid (12.4%), Kasserine (14.8%), Jendouba (17.1%) and Kairouan (20.7%) remain among the least connected in the country, illustrating how structural inequalities map directly onto levels of digital inclusion.

The INS report further distinguishes two markedly different "digital worlds." In urban areas, 81.4% of individuals use the Internet, compared with only 61% in rural areas, reinforcing the divide in everyday digital participation. Computer use mirrors this pattern: 40.2% of urban residents use a computer, compared with just 19.4% in rural areas. These disparities have both social and economic implications, as they limit rural populations' access to information, digital services, and opportunities for education, employment, and civic engagement.

Furthermore, Smex warns of a widespread lack of digital skills among the Tunisian population and even more so among the staff of civil society organisations, compromised by limited financial and human resources, which weakens their ability to use information and communication technologies (ICT) effectively. The UNDP report, Digital Inclusion Index in Tunisia, points to a lack of knowledge and misunderstanding of information technologies as a major obstacle. Finally, although Tunisia ranks high in terms of readiness for emerging technologies, particularly in artificial intelligence (AI) according to the AI Talent Readiness Index 2025, the low digital inclusion of rural or disadvantaged populations and the lack of local skills mean that most CSOs and citizens are not truly equipped to take advantage of such technologies, limiting their potential for innovation and structured civic engagement.

C) Recommendations

Recommendations to the Government

1. Executive Branch

- Re-establish independent institutions and oversight bodies, including the Independent High Authority for Elections (ISIE), the Independent High Authority for Audiovisual Communication (HAICA), the National Authority for Access to Information (INAI), the National Authority for the Protection of Personal Data (INPDP), and the High Authority for Human Rights.

- End rhetoric that stigmatises associations and human rights defenders; uphold Tunisia's obligations under the ICCPR and the African Charter on Human and People's Rights; and guarantee an enabling environment for freedom of association, expression, press freedom, and the right to peaceful assembly.

- Cease hostile discourse on foreign funding and rely instead on established financial-oversight mechanisms—such as the Central Bank and the Tunisian Financial Analysis Commission—while ensuring full implementation of Decree-Law 2011-88's reporting requirements for associations.

- Refrain from using the public prosecutor's office to initiate coercive investigations against associations, human rights defenders, or civic actors, and ensure fair trial guarantees, judicial impartiality, and protection of magistrates from political interference.

- Develop and implement a national strategy to expand and improve Internet access in rural areas.

- Strengthen data-protection safeguards by ensuring the INPDP's operational independence, conducting Data Protection Impact Assessments (DPIAs) for all state projects involving large-scale data processing, and ensuring transparency and civil-society participation in digitisation initiatives.

2. Financial Supervisory Bodies (BCT and CTAF)

- Ensure that anti-money-laundering and counter-terrorist-financing (AML/CFT) frameworks are not misused to target or obstruct civil society organisations.

- Regulate investigations strictly on objective and proportionate criteria, guaranteeing transparency, preventing misuse of AML/CFT tools, and ensuring they are not applied as a form of undue pressure on associative activity.

3. Security Forces

- Respect and protect the rights to peaceful assembly and freedom of expression, refraining from disproportionate interventions during demonstrations, including unjustified force, arbitrary arrests, and intimidation.

4. Legislature

- Repeal Decree 54/2022 on cybercrime and replace it with an organic law that safeguards freedom of expression while addressing digital-era challenges.
- Revise legislation governing demonstrations and states of emergency to align with international human-rights standards.
- Reopen parliamentary processes to civil-society organisations and allow media access to all parliamentary sessions.
- Withdraw the draft law on associations and maintain Decree 88/2011, as recommended by Tunisian civil society and UN special procedures.
- Abandon proposed laws on biometric identity cards, the Mobile ID system, and the subsidy-compensation platform, replacing them with legislation grounded in personal-data and privacy protection and developed in consultation with relevant experts.

5. Judiciary

- End prosecutions and detentions based on the peaceful expression of opinions, release all prisoners of conscience and political detainees, and cease the use of repressive laws, including Decree 54/2022.
- Apply only the specialised legal frameworks governing journalism and media (Decrees 115 and 116) in cases involving journalists or media workers.

6. State Media

- Uphold editorial independence through balanced, pluralistic reporting based on verified facts, regardless of political or security pressure.
- Resist intimidation from public authorities, maintain rigorous investigative reporting on political and social matters, and strengthen professional solidarity—establishing legal-support networks, digital-security mechanisms, and reporting channels for violations.
- Enhance financial and editorial transparency through regular publication of activity reports, governance policies, and conflict-of-interest procedures to bolster public trust.

Recommendations to the International and Donor Community

1. Funders

- Prioritise multi-year and structural funding mechanisms over short-term, project-based support, with an emphasis on core funding that enables strategic planning, team stability, and programme continuity.

- Allocate dedicated budget lines for operational costs, legal defence, compliance requirements, and strengthening digital-security and technological infrastructure—especially vital in contexts of surveillance and administrative harassment.

- Decentralise funding so that resources are not concentrated in major cities or large organisations, ensuring equitable access for smaller local associations, especially in inland and underserved regions.

- Reduce administrative burdens in grant processes and harmonise reporting requirements across donors to alleviate bureaucratic pressure and expand equitable participation.

Recommendations to Civil Society Actors

- Strengthen internal governance and foster inter-organisational solidarity by building durable alliances between national, regional, and local actors; establish real-time monitoring platforms that document threats and violations; and enhance capacities in digital security, risk management, and compliance.

- Raise public awareness of attacks on civic and associative freedoms through accessible, data-driven communication, helping to prevent the isolation of targeted organisations and to highlight the socio-economic contribution of the associative sector.

- Maintain an active presence in civic space despite restrictions by diversifying strategies, mobilising local communities, reinforcing social legitimacy, and demanding formal mechanisms for dialogue with public authorities at both national and local levels.

- Negotiate funding arrangements to ensure that grants reflect the real needs of Tunisian society rather than solely donor-driven priorities.

D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the CIVICUS Monitor. However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. The panel for this discussion took place in October 2025. The discussions are supported by secondary sources, such as V-Dem, the Bertelsmann Stiftung Governance Index, the RTI Rating from the Centre for Law and Democracy, and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.

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