EU SEE

SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Papua New Guinea

Country Focus Report

2025

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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 6 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.

Reporting period covered: November 2024 – November 2025

Brief Overview of the Country Context

Papua New Guinea's politics reflect its diversity, with over 800 languages spoken among a population of around 11 million. This diversity shapes a civic space where traditional structures such as the "Big Man" leadership model and the wantok system often supplant formal governance, further weakening institutions and reinforcing accountability gaps.

The political context can be characterised as unstable due to the frequency of attempts to depose the executive government and consolidation of power. For instance, in September 2024, Prime Minister James Marape survived a vote of no confidence, only to have another motion of no confidence lodged later that same year. In March 2025, parliament amended the Constitution to grant an 18-month grace period for any prime minister who survives a vote of no confidence, thus, consolidating Marape's position until the 2027 elections. The same sitting also amended the Constitution to declare PNG a Christian nation, a move limited to the preamble but strongly opposed by the Catholic Church, warning it could undermine constitutional guarantees of freedom of thought and religion.

Over the last year, the PNG Opposition has been vocal and increasingly critical of decisions made by the PNG Government on several issues including census financing, election preparedness, and capital infrastructure projects. Since his appointment as Opposition leader on 1st December 2025, James Nomane has set out plans to challenge the government, beginning with the review of the national budget.

Security concerns continue to weigh heavily. The January 2024 riots, triggered by a payroll glitch affecting police salaries, exposed the fragility of state authority. Sporadic violence and kidnappings in the Highlands, alongside the spread of illegal firearms across the PNG - Indonesian border, have further eroded public trust in law enforcement.

Persistent governance failures and weak service delivery continue to define daily life, particularly in rural areas where most citizens reside. Public health and education services are largely provided by churches and civil society, while inequality and economic vulnerability remain deep-rooted. Together, these developments highlight a political environment marked by institutions handicapped by lack of funding and other operational constraints, a legislature captured by executive dominance, and economic vulnerability, as the country heads toward the 2027 national general elections.

The overall assessment of PNG's Enabling Environment from the panel is that it allows for an active civil society within a fragile state with weak institutions and deteriorating norms. There is long-standing support for the role of civil society in service delivery, however this is tempered by the political and commercial actors opposing activism by governance, environmental, and human rights actors.

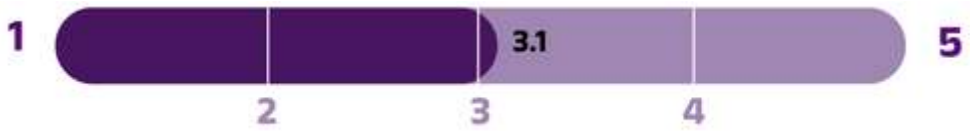
Many of the challenges to the enabling environment are emerging within the digital space. New state regulations have been opposed by citizens, political actors, and other stakeholders in government (i.e., CSOs, churches, etc.). Although norms of the rights to assembly, expression and civic participation are well established in principle, the scope and application of these precepts continues to be contested in the digital spaces mediated by regulatory authorities and multinational firms engaging on areas of shared interest.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score: [1]



Papua New Guinea's (PNG) civic space is currently rated as **"**Obstructed**",** according to the CIVICUS Monitor. At the outset, Papua New Guinea's constitution provides a solid basis for the protections of these fundamental freedoms such as the freedom of association, assembly, expression, access to information, etc. Over the past year, while many of these freedoms have remained unchanged, their practical enjoyment has faced increasing challenges due to legal, regulatory, and political developments.

1.1 | Freedom of Association

Freedom of association is guaranteed under Section 47 of PNG's Constitution. Pursuant to Section 38 of the PNG Constitution, the right to the freedom of association is a qualified right, which means that it may be subject to limitations imposed by law. The Associations Incorporation Act categorises "associations" as either being for public benefit or member benefit. The legal scope for civil society incorporation is broad, with the Act permitting incorporation of associations for "every charitable purpose relating to the relief of poverty, the advancement of art, education, science, religion, charity, health, cultural welfare, agriculture (such as soil, crop, livestock and poultry improvement), wildlife conservation, administering any community trust or fund, or other objects beneficial to the public at large."

This broad definition allows most groups, including marginalized communities, to register without restriction. However, it is important to note that homosexuality is still defined as a

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

criminal act under PNG law (Sections 210 and 212 of the PNG Criminal Code Act), carrying a maximum penalty of 7 years imprisonment, though no such cases have been prosecuted in recent years. Thus, any formal associations representing LGBTQIA+ issues or communities are automatically precluded from registering.

It should also be noted that political parties in PNG are required under s.28(c) of the Organic Law on the Integrity of Political Parties and Candidates (OLIPPAC) to register as Associations, as a pre-requisite to being registered and administered as political parties.

Historically, the most politically active forms of associations have been workers unions, which are incorporated as associations and registered with the Trade Union Congress. Trade unions have been active in industrial disputes, particularly within state owned enterprises. A recent example is employees of the state utility company, Water PNG, going on strike regarding employment benefits.

However, in the last decade, the category of association that has been the most politically active (and stifled) has been tertiary student associations in PNG universities. Following protests on campus against the and shut down of classes in 2017, the state actively pursued legal action against student leaders. This resulted in Student Representative Councils (SRCs) being disbanded by their respective university administrations and rendered inactive for 5 years. Only in the last two years have these restrictions been lifted, allowing students to have elections and re-establish functioning SRC's. This appears to have been implemented as a means to weaken popular support for SRC's from both students and the wider public.

There have also been significant changes in the past year to the legislative requirements for registering an association, creating two types of associations for charitable status. These two categories are - (1) Public Benefit Associations and (2) Members' Benefit Associations. The Act requires existing associations to re-register with the Investment Promotion Authority within 12 months, formalises the duties and liabilities of committee members and the public officers, tightens financial reporting and auditing requirements, mandates annual returns, and introduces provisions for registering foreign organisations.

While these changes have been made with the intention of better aligning with global Anti-Money Laundering/Counter Terrorism Funding (AML/CTF) standards, civil society actors are concerned that the increased cost of compliance on CSOs may become overwhelming for smaller civil society organisations, bearing the inherent risk of undermining their constitutional right to freedom of association.

1.2 | Freedom of Assembly

The freedom of assembly is established under Section 47 of the PNG's Constitution. Similar to the freedom of association, the right to the freedom of assembly is a qualified right. This means that it may be subject to limitations imposed by law. In practice, this right is regulated by The Peace and Good Order Act 1991, which has been used by police to regulate public gatherings and the right to peacefully assemble. All public events, rallies, and protests are subject to a vetting process requiring prior police approval. When applying for a permit to a provincial committee, organisers must include necessary information such as names of the permit holders, the purpose, time, and location (or route in the case of a procession). Provincial Peace and Good Order Committees (PPGOC) are comprised of provincial authorities and police. Upon receipt of an application, the committee is required to meet promptly and issue a

permit, unless there are reasonable grounds to believe the event would disrupt peace and public order.

Division 4 of the Criminal Code Act 1974 criminalizes unlawful assemblies and breaches of the peace. It establishes offences including unlawful assembly (s.64), riot (s.65), remaining assembled after a lawful order to disperse (s.66), rioters demolishing buildings (s.67), smuggling or rescuing goods under arms (ss.68–69), going armed so as to cause fear (s.70), forcible entry and detainer (ss.71–72), affray (s.73), challenging to fight a duel (s.74), prize fighting (s.75), threatening violence (s.76), assembling for the purpose of smuggling (s.77), and unlawful processions (s.78). These provisions empower police to regulate and control assemblies in the interest of preserving public order and safety.

In practice, the current framework opens the door to political influence. The process for CSOs to request protest permits in Port Moresby is vague and unclear, resulting in many protests not being approved. While routine permits for community events are largely administrative, politically sensitive gatherings face inconsistent approvals that restrict the right to assembly. A recent example of this was the February 2025 circulation of a false permit to protest against the constitutional amendment limiting Parliament's ability to hold votes of no confidence. The January 2024 riots that occurred across multiple urban centres, has also made it more difficult for peaceful protest. Such precedents have dramatically lowered the PPGOC threshold of tolerance for potentially disruptive public gatherings for fear that they could devolve into chaos or rioting.

In a 2021 joint submission on Papua New Guinea to the UN Universal Periodic Review for the 39th Session of the UPR Working Group, CIVICUS identified that the right to assembly fails to meet international standards. Specifically the submission called for Papua New Guinea to: "Adopt best practices on the freedom of peaceful assembly, as put forward by the UN Special Rapporteur on the rights to freedom of peaceful assembly and of association in his 2012 annual report, which calls for procedures in which there is simple notification of assemblies being held, rather than explicit permission being needed to assemble."

1.3 | Freedom of Expression

Freedom of expression is a guaranteed right under Section 46 of the PNG Constitution. However, it is a qualified right, meaning it may be subject to limitations imposed by law. Historically, freedom of expression has been staunchly defended by Papua New Guineans, with protections such as public interest, fair comment and truth, and the Defamation Act. An example of this was the public outcry in 2023 over a draft government policy to regulate all mainstream media organizations. This public outcry led to a delay and further consultations, although the policy was eventually finalised and executed.

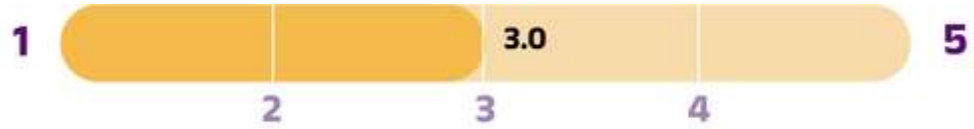
Over the past 12 month there have been two trends that contribute to the erosion of freedom of expression in Papua New Guinea: the silencing of journalists, and the abuse of the Cybercrime Code Act 2016. In May 2025, there was the high-profile suspension and ultimate termination of radio host Cullighan Tanda following an allegedly 'unauthorised' interview by Tanda of an MP who at the time was the nominee to be alternate Prime Minister in a vote of no confidence. Tanda's suspension ignited public uproar, although not enough to prevent his termination by the state-owned radio company. In light of Mr. Tanda's case, a parliamentary committee was established to inquire into the standard of PNG media reporting and the external pressures placed upon journalists.

Furthermore, recent years have seen a spike in instances where public officials have invoked the Cybercrime Code Act 2016 to spuriously engage police intervention in shutting down valid online criticism. The Act itself does not contain any explicit provisions for the protection of freedom of expression, nor does it make any meaningful considerations to this effect. Instead, it creates broad discretionary powers for enforcement agencies in determining what constitutes an offence under the law. Civil society actors have raised concerns around the growing use of Strategic Litigation Against Public Participation (SLAPP) lawsuits in Papua New Guinea. A recent example was the case of environmental defender Eddie Tanago, who was charged with “Identity Theft” under Section 15 of the Cybercrime Code Act in December 2024, after he reposting a photograph of a public official on Facebook with commentary on forestry enforcement. The charge was later struck out by the Waigani District Court in April 2025. While this case has established a landmark precedent on the arbitrary application of cybercrime provisions, it has also further heightened concerns that other legal mechanisms may be vulnerable to being used to stifle legitimate public debate and democratic participation.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score:



Civil society organisations in Papua New Guinea have generally enjoyed the freedom to be legally incorporated within an established framework under the Associations Incorporation Act. In recent years, however, growing pressure to align with global Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) standards has led the government to amend the Act in 2023, introducing stricter compliance requirements for civil society organisations.

While these reforms are intended to strengthen governance standards and improve financial reporting and accountability among registered associations, civil society actors have expressed concern about the increased cost of compliance and administrative burden for smaller organisations. Often, these organisations lack the capacity and resources to meet the set requirements, thus exposing them to penalties or even the risk of deregistration.

2.1 | Registration

The Associations Incorporation Act (AIA) governs the registration of associations and outlines a clear process and requirements when applying for incorporation. Under the Act civil society organisations seeking incorporation are required to lodge an application with the Registrar of Companies through the Investment Promotion Authority, the statutory body in charge of facilitating and regulating all domestic and foreign investment. Applicants are required to provide a constitution, details of office bearers and members, organisational objectives and pay a registration fee. 2023 amendments to the AIA introduced more stringent accountability and compliance requirements for associations. These changes require all CSOs to be formally registered, and to have documentation on internal governance procedures, as well as financial reporting and record keeping. Consequently, any failure to comply with these requirements will result in either de-registration or rejection of the application to register. While these measures aim to strengthen accountability, the administrative and compliance requirements

may be cumbersome and costly for smaller CSOs that lack resources and capacity. In the case that an application to register an association is rejected or an association is deregistered, recourse is provided under the Act, whereby an objection period of one month is provided for appeals at both the Investment Promotion Authority (IPA) and the District Court (Lower/Committal Court). Furthermore, while appeals against the rejection of applications to register are permitted by law, there is a general lack of public awareness on the avenues of recourse (both legal and otherwise) available to applicants. This is mainly due to low literacy and limited access to official government information. Although registration fees are modest, other associated costs and a pervasive lack of awareness of the registration processes and requirements can present a significant barrier to entry for smaller groups.

Public access to the incorporation process has also been improved with the recent digitization of the IPA registration processes, now allowing applicants to file registration and fulfil compliance requirements online. This means applicants are no longer required to physically present themselves at an IPA branch to file applications or other documents. In practice, it is easy to register associations, and the costs are within reason.

Although the overall legal framework is enabling, low public awareness of the legal and regulatory frameworks for incorporation acts as a barrier for CSOs that would need more attention.

2.2 | Operational Environment

There are no unreasonable restrictions on CSO autonomy in PNG. CSOs are allowed to set their own objectives and activities without needing government approval. Administrative oversight mainly focuses on annual returns (Section 77 of the AIA 2023) and audited financial statements (Sections 78-81 of AIA). While larger NGOs with staff capacity can manage these statutory compliance requirements, smaller, community-based groups often struggle to meet deadlines. This increases the risk of being penalized and/or deregistered, as demonstrated in the mass deregistration carried out by the IPA in 2020.

Funding access is not restricted by law, although banking processes make compliance an ongoing administrative burden. It is not only large or foreign grants that attract scrutiny, with even day-to-day transactions, such as payroll, supplier payments, or changing signatories, often triggering repeated requests for documentation. This is in part due to banks adopting Know Your Customer (KYC) compliance to meet the requirements under the Anti-Money Laundering & Counter Terrorist Financing Act 2015. The Asia-Pacific Group on Money Laundering's mutual evaluation on PNG's anti-money laundering and counter-terrorist financing regimes in 2023 gave PNG a "Partially Compliant" rating, indicating low effectiveness in monitoring Money Laundering/Terrorist Financing risks. The final report also identified corruption, bribery, and illegal logging as key risk areas. To address these issues, commercial banks have adopted generalised precautionary measures that have the effect of disproportionately restricting local NGOs' access to financial services.

These financial issues have resulted in delayed routine operations, adding costs in staff time, and creating reputational risks when payments to suppliers and contractors are late. These issues are compounded by frequent foreign exchange shortages in country, which have often prevented larger CSOs from receiving foreign funding, delaying international payments for goods, services, and technical expertise.

A further concern is the PNG Government's CSO Partnership Policy (2024–2034). While framed as supportive, it is heavily focused on positioning CSOs as service delivery partners for government, rather than empowering their role as independent voices for accountability and reform. Concerns have been raised that this could further undermine the independence of CSOs in PNG, or worse, be used to funnel public funds through organisations with political ties.

This echoes past experiences with state-administered structures such as Provincial Gender Based Violence Action Committees (GBVACs), which have struggled to give effect to their initial mission statements due to weak resourcing, lack of autonomy, and competition with existing civil society networks. Submissions to the Department for Community Development and Religion have posited that creating more government-led structures risks undermining genuine civic action rather than strengthening it.

Together, these factors illustrate that although the law allows CSOs to operate freely on paper, the realities of bureaucratic hurdles, day-to-day banking burdens, forex shortages, and policy biases toward public service delivery, continue to impede the operation of CSOs. As a result, the operational environment is only partially enabling.

2.3 | Protection from Interference

Papua New Guinea's legal framework provides formal protections against the arbitrary dissolution of associations. Section 108 of the AIA 2023 outlines clear grounds for removal or deregistration of incorporated associations. This includes a 30-day notice period and recourse for appeals in the National Court, which has jurisdiction over the more serious civil and criminal cases and appeals from the district courts. Grounds for deregistration include procedural and administrative non-compliance, exceeding or abusing legal authority, and engaging in fraudulent or unlawful actions. PNG's Constitution (Section 47) also guarantees the right to freedom of association, and through its ratification of the International Covenant on Civil and Political Rights (ICCPR) in 2008, the government has international obligations to protect these freedoms.

The reality, however, is that legal remedies are rarely accessed by smaller CSOs due to high costs, slow judicial processes, and a lack of resources (both financial and non-financial). This means that while avenues for appeals exist in theory, they are often inaccessible.

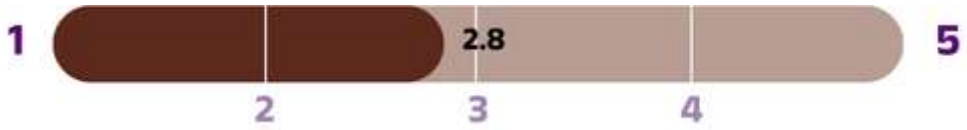
While CSO staff and human rights workers are protected as regular citizens under the Constitution and PNG's international obligations, there are no special protections under the current legal framework to safeguard CSO staff or human rights defenders from harassment or intimidation. Workers in sensitive fields (e.g., anti-corruption, extractives, Gender-Based Violence/Sorcery-Accusation-Related Violence advocacy) face real threats and risks of retaliation from both state and non-state actors, with limited legal recourse. While Parliamentary consultations in 2022 discussed a draft Human Rights Defenders Protection Bill, no such law has been enacted to date, leaving defenders reliant on weak enforcement of constitutional guarantees and international commitments.

In conclusion, although PNG's legal framework provides protections in principle, weak enforcement, costly remedies, and cumbersome administrative requirements have contributed to the progressive shrinking of civic spaces, whereby smaller CSOs and their agents are exposed to litigation, threats, intimidation, and other forms of interference by both state and non-state actors.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score:



Civil society organisations (CSOs) in Papua New Guinea continue to face significant constraints in accessing sustainable funding. While limited government support exists, most CSOs rely heavily on international donor funding, which is often difficult for smaller and rural-based organisations to access due to compliance and banking requirements. Funding opportunities tend to favour more well-established, urban-based organisations, leaving smaller CSOs with limited capacity and visibility at a disadvantage. Our recent assessment shows how recent reductions in international funding, including cuts to major donor programs, have further strained the financial sustainability for CSOs. As a result, many CSOs struggle to maintain long-term programs, relying instead on short-term project funding that constrains strategic planning and long-term community impact.

3.1 | Accessibility

Apart from budgetary allocations to the Department for Community Development & Religion and government-backed secretariats such as the National Gender-Based Violence Secretariat, which provide some funding to NGOs, there is limited government support for local CSOs from the national purse.

Donor agencies, therefore, remain the primary source of funding opportunities for many local NGOs. To receive donor or any other funding, NGOs are typically required to be formally incorporated and registered with the Investment Promotion Authority, have a Tax Identification Number with the Internal Revenue Commission, and a bank account. While these are standard compliance requirements, they pose barriers for smaller, grassroots organisations, particularly in rural areas, which often lack administrative capacity, legal awareness, and access to banking services. This limits their ability to qualify for donor funding, often excluding them from

direct funding opportunities or forcing them to operate through larger intermediary organisations.

Well-established or urban-based CSOs have a higher success rate with securing international grants, while smaller provincial and community-based organizations often lack the proposal-writing expertise, networking opportunities, and administrative capacity needed to develop strong proposals.

Quasi-NGOs which have comparatively greater access to international donor support, tend to be relatively more financially sustainable than smaller local NGOs. These larger organizations benefit from well-established reputations, global visibility, and credibility with both government and international partners. By contrast, smaller local NGOs often struggle to secure funding. Most operate on a voluntary basis, and when funding is available, it is usually tied to specific projects rather than core operational support. Opportunities for raising independent funds or achieving financial self-reliance remain limited.

Financial access continues to pose a major challenge. In recent years the increase in banking compliance measures, such as Know-Your-Customer (KYC) and Customer Due Diligence (CDD) requirements, make it challenging for small NGOs to open or maintain accounts. While these measures are necessary to combat money laundering, their inefficient implementation has often resulted in delays on donor fund transfers, payroll, and supplier payments, thus increasing the administrative burden on CSOs and eroding donor confidence. Furthermore, these challenges are compounded by several administrative limitations, i.e., approximately 85 per cent of Papua New Guineans live in rural areas, and only about 3 million of the estimated 11 million population possess national identification cards. The absence of formal IDs, combined with limited banking infrastructure, makes the process of opening accounts particularly cumbersome for rural-based NGOs.

There are tax incentives to support local philanthropy and encourage donor participation. The current PNG Income Tax Act 2025 allows non-profit organizations to receive refunds for Goods and Services Tax on expenditures. This amounts to 10% of the cost of any goods or services procured by non-profit organizations for legitimate operational expenses. Moreover, the current tax regime allows corporate and other donors who fund CSO operations under their corporate social responsibility programs to earn rebates on such charitable donations. This applies in cases where the recipient meets the Internal Revenue Commissions' legal requirements and has a legitimate deed of trust. However, some non-profit organisations remain registered under the Companies Act and are taxed as for-profit entities due to a lack of awareness or familiarity with the IRC regulatory frameworks.

Ultimately, CSOs in Papua New Guinea primarily rely on international funding, though access has become increasingly limited due to shrinking global aid budgets, shifting donor priorities such as the global withdrawal of the USAID program, and greater competition. Research and networking are required to learn about new opportunities and assess whether it is worth committing a CSO's resources and time to pull together a proposal that meets the requirements of any call for expressions of interest. This is further exacerbated by the generally low public awareness of PNG laws and regulations (despite the fact that both the IRC and IPA have made significant progress towards digitizing their systems and providing simplified explanations of prevailing regulations and requirements) and the low literacy rates nationwide.

3.2 | Effectiveness

Country assessments are drawn up internally by development partners, after interviewing relevant stakeholders on the ground. Despite this, the design and end-of-program outcome of the grants available to CSOs remain largely donor-driven with minimal input from local actors. CSOs' needs and priorities that do not readily fit within the parameters of a donor-driven agenda are either abandoned or must be argued for on a case-by-case basis. Smaller CSOs are typically unable to pursue the latter owing to limited access and resources.

While some flexibility exists in implementation schedules and cost variations, grants provided to CSOs are generally tied to pre-determined priority areas. Evidence from experts indicate there is a vast disparity between the number of solicited proposals (responding to donor grants) and unsolicited proposals (fully defined and sponsored by CSOs based on their assessment of community needs) being funded and implemented in PNG. While some donors have demonstrated flexibility in accommodating CSO priorities within their grant scope, it would be fair to say that most of the CSO projects currently being implemented in PNG are driving donor priorities. This is also evidenced by several cases where established CSOs have had to almost completely depart from their original mission statements to ensure their operational sustainability.

This raises a critical question on whether the priorities identified by government or donor agencies reflect the most pressing issues in the local context. Frequently, local CSOs find that their priorities do not align with those defined by the donors. Yet they are compelled to tailor their proposals to match the donor's agenda in order to access funding. The result is a focus on issues that donors deem important, often at the expense of priorities identified by communities themselves.

This misalignment is partly attributable to the PNG government's limited capacity to collect and maintain accurate databases on vital sectors such as health, education, and climate change. The lack of reliable data prevents contextually grounded priority-setting. However, this issue is also shaped by broader geopolitical contestations in the Pacific, particularly between China and Western partners. Increasingly, donor and bilateral engagements with PNG have been securitized, with grants and aid flows serving not only developmental purposes but also strategic interests. In this sense, the divergence between donor priorities and local needs is not merely incidental but intentional, reflecting the use of development assistance as a tool of influence. In the environmental sector, government agencies such as the PNG Conservation and Environmental Protection Authority (CEPA) are aware of the predicaments of civil society actors who implement most of the community-based work.

The challenge, however, is that donors often lack flexibility in allowing their funds to be used in areas that civil society actors recognize as important. For example, in a local CSO's experience, a community's need for water was identified as much more important than other need areas, so donor funding to support water security efforts was sought. However, the donor decided to withdraw this fund from the local organisation and gave it to a private company, which they believed had the capacity to complete this, thereby using CSOs to obtain first-hand field data, before passing them up in the implementation. This was despite this specific civil society actor's efforts in completing the preparatory stages and organising the communities to participate in the project.

Hence, effectiveness is disabling. Donors have little flexibility and reinforce an unequal and hierarchical relationship that limits civil society actors' autonomy and responsiveness to local needs and priorities.

3.3 | Sustainability

USAID funding cuts in early 2025 (though a smaller development envelope in comparison to Australia and others) has left a noticeable gap in the pool of resources available to deliver CSO programming in PNG, for instance in addressing state fragility. This has diminished the ability of civil society actors to achieve long-term programmatic goals and engage in strategic planning. As much of their effort is now redirected toward short-term survival, secured through project-based funding rather than long-term, core funding.

Smaller community-based groups tend to represent the localised interests of the rural majority of Papua New Guineans. Their proximity gives them a unique understanding of local needs and priorities. However, their limited visibility, weaker reputational standing, and limited access to donor networks create systemic disadvantages that dramatically restrict their ability to achieve long-term sustainability and/or engage in long-term strategic planning.

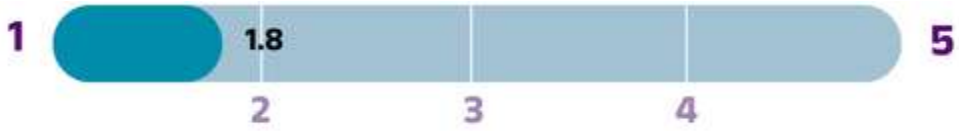
Funding is largely project-based rather than core funding, which limits the ability of civil society actors to scale programs or maintain long-term initiatives. Thus, directly impeding their impact at the community level. While civil society actors have been able to deliver results and demonstrate self-reliance through fundraising and small income-generating activities, these efforts alone are insufficient for financial stability.

Stronger state support, combined with flexible donor funding, is necessary to improve sustainability. Without this, civil society actors remain dependent on short-term project cycles, limiting their ability to invest in organizational development, staff retention, or long-term community impact. Collaborative input from state, donors, and civil society actors is essential to strengthen financial resilience and enable civil society actors to achieve long-term sustainability.

PRINCIPLE SCORE

4. Open and Responsive State

Score:



Over the past year, the relationship between civil society and the Government of Papua New Guinea remains generally cordial, with civil society organisations frequently invited to participate in consultations and policy discussions. However, while these engagements create opportunities for dialogue, civil society actors report that their inputs are rarely reflected in final policy or legislative outcomes. Transparency remains limited due to the absence of a freedom of information framework, making access to public information difficult despite constitutional guarantees. Although consultation processes exist, concerns persist that they are often procedural rather than substantive, with weak accountability mechanisms and minimal government feedback on how civil society contributions influence decision-making.

4.1 | Transparency

Section 51 of the Constitution grants citizens a right to “reasonable access to official documents,” subject to exemptions (such as cabinet records, defence, trade secrets) where secrecy is “reasonably justifiable in a democratic society.” In practice, legal exemptions on freedom of access to information are applied broadly, while procedures for freedom of information (FOI) requests remain unclear.

This status quo is further aggravated by the absence of an FOI law in PNG to operationalise the constitutional guarantee, compel disclosure or provide recourse for persons unreasonably restricted from accessing official government information. The most recent attempt to draft a PNG FOI framework was initiated under the PNG Open Government Partnership in 2020, although this effort has yet to deliver a complete PNG FOI policy or bill. In the interim, citizens are left without a legally enforceable mechanism to request public information.

As a result, it is very challenging for citizens to access public information in PNG. Simple, straightforward requests are not entertained or are outright ignored. A 2019 report by

Transparency International PNG Inc highlighted a culture of secrecy among PNG government agencies that makes it difficult for ordinary citizens to access official public information.

As a result of this culture of secrecy in the PNG public sector, larger CSOs that have the capacity and funding to conduct research have turned to supporting smaller CSOs with access to information. Such as the case where the Center for Environmental Law and Community Rights (CELCOR) supported the Alliance of Solwara Warriors. This support resulted in the landmark ruling in Mesulam v Joku (2022), after the National Court had denied access to seabed mining documents. On appeal, the Supreme Court in SCA No. 84 of 2022 (29 Nov 2023) overturned the ruling, holding that agencies must (1) show how documents fall under exemptions and (2) justify why secrecy is reasonable in a democratic society. Being the first to directly interpret Section 51 of the PNG Constitution, this decision serves to reinforce citizen rights to access information by creating an obligation under which public agencies are required to provide reasonable justification for purported exemptions under Section 51. While this was a significant win for PNG citizen access to information, the absence of an FOI law and accompanying regulations means that this right is still not legally enforceable, nor is there a legally prescribed process for FOI requests. Nevertheless, PNG has committed to improving government transparency through initiatives such as the Open Government Partnership (OGP), established in 2015, and the Extractive Industries Transparency Initiative (EITI), established in 2013. The OGP is now in its 10th year of implementation and is undergoing co-creation of its third National Action Plan, with civil society participating in the development of commitments (OGP PNG 2022–2024 Report). Meanwhile, the EITI publishes extractive sector reports overseen by a Multi-Stakeholder Group including government, industry, and civil society (EITI PNG 2022 Report). While these multi-stakeholder interventions are ongoing, restrictions on citizen access to information remain obscure and disabling.

4.2 | Participation

While civil society actors are involved, engaged, and frequently invited to participate in government consultations and implementation, there is mounting concern among civil society actors that many government-sponsored consultations are performative. This is especially true in cases where CSO feedback on critical new laws, public policy, and investments tend to have little to no impact on any subsequent government intervention.

The only government-approved platform for formal input is through the Consultative Implementation and Monitoring Council (CIMC), a quasi-NGO largely funded by the state. CIMC holds public forums, compiles reports, and submits them via the Department of National Planning, although there is no way to assess how often its recommendations impact on policy decisions.

Under OGP, NGOs and government agencies co-chair reforms, with departments acting as “champions” to advance commitments. However, implementation has been weak. Two national action plans have been launched since 2018, but a recent assessment of PNG’s second National Action Plan found that the country had failed in nearly all its commitments to openness, accountability, and inclusivity in government decision-making.

Papua New Guinea scored 0 out of 100 on the most recent Open Budget Survey’s participation indicator. This means citizens and civil society organizations have no formal opportunities to engage in the national budget process, whether during formulation, approval, implementation, or audit. PNG’s score places it at the very bottom of the global spectrum of budget

transparency and participation, far below the global average of 15, and demonstrating the systemic exclusion of PNG citizens from fiscal governance.

The existing formal mechanisms for consultation have been criticised by NGOs in the drafting of a national media policy, for a lack of inclusivity and respect, with CSO evidence and perspectives being sidelined in political debates, particularly when they challenge official narratives or powerful interests. Moreover, there have been other cases such as Parliament's passing of the problematic Whistleblower Act 2020 and the Counter-Terrorism Act 2024 (this law's implications on digital privacy and government control over social media platforms are discussed further in Principle 6), which were passed with minimal public consultation.

Despite the apparent benefits of boarder consultation and meaningful engagement with civil society actors, state agencies are often selective in determining who can and cannot participate in consultations. Although some regulatory processes and documentation are required to go thorough input from all stakeholders, this is often not practiced. In the past, state agencies have been known to conduct hasty consultations which serve largely to validate their processes or agenda. Such consultations rarely capture the full input of all stakeholders in any meaningful way. Concerns about exclusionary practices were evident in the drafting of the National Media Development Policy, where the government allowed only a 12-day public review period for consultation. This timeframe was widely criticized as inadequate for meaningful engagement of all necessary stakeholders.

4.3 | Accountability

As shared by experts engaged in this research, while participation is very important, the government does not provide any meaningful feedback on how inputs are used in decision-making. Moreover, it is commonplace for CSO inputs to not be acknowledged, nor any consolidated documents provided to verify how CSO inputs impact any resulting public policy or legislative outputs.

Additionally, the government is not legally obliged to report back to CSOs on how their inputs have shaped public policy, legislation, or decision-making. As a result, CSOs receive minimal-to-no feedback on inputs, with no accountability from government.

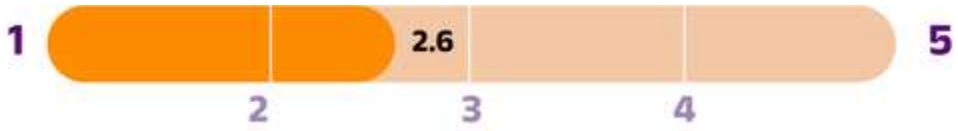
Furthermore, state actors can sometimes be passively dismissive of CSO recommendations, especially where they fall outside the scope of the prevailing government agenda. Experts highlighted that there were many cases where CS actors were told that their feedback was "taken under advisement" although this was not reflected in the final output. Moreover, consultations were rarely followed up with action or any explanation on why CS feedback was not incorporated. This is especially true in cases where CSO feedback is not incorporated into the resulting policy, bill, or action in any meaningful way, despite underscoring valid considerations or areas of concern.

A recent example of this trend was the Special Parliamentary Committee on the 2022 General Elections (SPCGE), where TIPNG was invited to be a member of the Technical Working Group and contributed to the development of 70 recommendations to improve the implementation and outcomes of the next general election. Despite these consultations, none of the 70 recommendations in the final SPCGE report have been implemented, with now less than two years before the next National General Election. Hence, accountability to CSOs is fully disabling.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score:



Civil society in Papua New Guinea is widely recognized for its important role in community development, service delivery, and civic education, particularly in rural areas where state services are limited. While communities generally view CSOs positively, political leaders and public discourse sometimes treat civil society with scepticism, especially when organisations engage in advocacy or challenge government decisions. Media coverage often plays a significant role in shaping public perceptions of CSOs. Barriers such as limited civic education, social inequalities, and weak enforcement of legal protections continue to restrict inclusive civic participation, despite constitutional guarantees of equality and civic rights.

5.1 | Public Discourse and Constructive Dialogue on Civil Society

Political leaders and government bodies often frame CSOs as essential partners for service delivery and community development, particularly in remote areas where state presence is weak. The government acknowledges that CSOs (notably the churches) are an essential part of the social fabric. There is a strong respect for Civil Society in the country, whereby it becomes politically disadvantageous for the government to publicly oppose civil society. This forms the justification for multi-stakeholder initiatives such as the PNG Open Government Partnership and the PNG Extractive Industries Transparency Initiative.

However, in the broader political space, CSOs are often viewed with suspicion and criticized as political opponents or proponents of a foreign agenda when engaging in advocacy or interventions that challenge government policy or exposes corruption. An example of this is when CSOs voiced public opposition to a US Defence agreement, which the Prime Minister branded as a 'political' ploy to discredit his administration. This demonstrates the conditional acceptance of CSO insights that rarely extends to treating them as genuine, independent

stakeholders in policy formulation. In some cases, civil society actors have been used by public figures acting in political self-interest. For instance, academics have studied the use of the civil society platforms in PNG to build up political profiles in the lead up to the 2017 election.

The State's ambivalence to the role of CSOs is further amplified by media coverage, which tends to be inconsistent and event driven. While some reporting highlights CSO contributions during crises, the media tend to also lean into scepticism, amplifying negative narratives or government criticisms that question CSO motives. Especially in cases where commentary by politicians is published without the inclusion of balancing opinions from relevant CSOs. For example, media outlets have been threatened by the government for reporting on corruption, which hinders the development of consistent public trust and appreciation.

Media support for CSOs through coverage is mostly driven by a profit motive rather than a consistent tone of public benefit. Our research recognized that this may also be a result of the lack of protection for journalists and media houses and ongoing persecution by state actors. The broader culture of public dialogue, including on social media, often mirrors this political scepticism, further constraining CSOs' ability to mainstream genuine concerns and considerations on national developments. This environment forces civil society actors to navigate a narrow space where their work is tolerated, but their advocacy is often marginalized, limiting their full potential as subject matter experts and contributors in the shaping of public policy and discourse.

5.2 | Perception of Civil Society and Civic Engagement

Community perception of CSOs varies significantly from the state perspective. Citizens believe that civil society plays a positive role in the country. This is especially true in the case of the mainline churches, which fund and operate much of the public health and education infrastructure in rural/remote areas of PNG (i.e., churches administer about 45% of rural health facilities in PNG). This positive perception is further strengthened by the legal framework, notably the Associations Incorporation Act 2023, which establishes a regulatory environment for CSOs in acknowledgment of their service to the public good, and reinforcing their legitimacy and community engagement.

Evidence at the community level indicates instances where CSOs have been afforded greater goodwill and courtesy by local communities than their state counterparts. For instance, CSO staff and election observers were allowed to pass freely through roadblocks set up by locals in conflict zones, while government convoys were not. This is believed to reflect a deeper appreciation and recognition of the direct impact that CSOs have had at the community level.

Many citizens do not engage in political processes outside of elections. MPs do not hold consultations in their constituencies before voting on new legislative or policy reforms, which are themselves often based on clan affiliation and clientelist campaigns. Civic education is limited, focused on understanding political structures instead of how citizens can engage by reinforcing civic rights and collective action.

While there are proposed national civic education resources available, this effort is more haphazard and not underpinned by a comprehensive national curriculum. For the most part, the most aggressive efforts to facilitate civic education at the community level are being driven by CSOs. Not only do CSOs engage in research to identify the gaps in community awareness on laws and government policies, but they also mobilize the necessary funding and expertise to develop resource materials and use them improve community awareness. This includes

research reports and briefs on issues of national concern, such as the Accountability Scorecard, resource materials on elections, the Organic Law on the Independent Commission Against Corruption, among others.

5.3 | Civic Equality and Inclusion

The PNG Constitution (sections 32 and 37) establishes equal rights and equal protection under law for all PNG citizens. However, violence against marginalized groups is widespread, limiting their participation in civic processes. A recent International Foundation for Electoral Systems report identifies that factors such as political violence against women and social norms greatly limit women's voting during elections. Female members of Parliament are few due to traditional societal norms. Moreover, systemic barriers to civic agency and participation are further evidenced by past cases where university students were shot at by police for protesting the government in the lead up to the 2017 National Election. More recently, youth groups expressed concern regarding exclusion from the PNG electoral rolls.

Certain proponents of commercial and business interests (particularly in the extractives sector) have demonstrated perhaps the highest levels of disregard for civil rights. For example, in 2012 a logging company in PNG's East New Britain Province detained environmental defenders in shipping containers for three nights, as a punishment for speaking out against the destruction of forest habitats. Mining companies also have a history of undermining civic processes, e.g., accessing public documents on mining impact assessments. While there aren't distinct national-level cleavages in society, there remains a fragile sense of national unity; although ethnic-group conflict arises frequently in rural communities, urban areas, and along religious lines.

Some existing legal frameworks support civic equality and inclusion. The PNG Constitution guarantees fundamental rights and freedoms for all citizens. The Pikinini Act 2015 for instance, protects children against abuse, exploitation, harmful cultural practices, and ensures access to services and safeguards.

Although prevailing legal frameworks embody the principle of equal protection for all, systemic inequity remains in their application. A perfect examples of this is sorcery accusation-related violence (SARV, i.e., the torture and killing of purported users of witchcraft, black magic, etc.), which was added to the PNG Criminal Code Act as an indictable offence in a milestone 2022 amendment. However, despite wilful murder based on sorcery accusations now being a criminal offence, police are often reluctant to arrest perpetrators and have, in some cases, sided with them due to ingrained and pervasive traditional beliefs. As a result, victims of SARV and Gender-Based Violence are routinely denied the justice they deserve. Such cases speak to the weakness of law enforcement in PNG, and the subsequent erosion of civil liberties.

While the desire to contribute to decision-making is strong, formal political processes are often viewed as distant, corrupt, or dominated by "wantok systems" (nepotism) and elitism, leading to widespread cynicism regarding an individual's ability to effect change at the national level. However, this is contrasted against a robust culture of physically contributing labour to community-level initiatives, such as building schools, aid posts, etc., where people feel they have the agency to affect tangible outcomes.

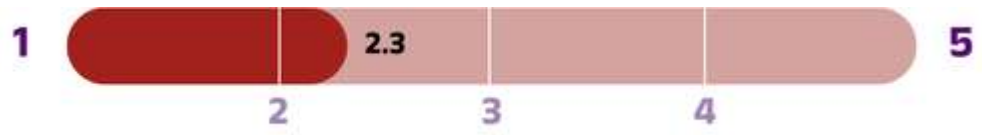
It is well established that having an active and engaged civic population drives equality. However, access to formal civic education is a critical bottleneck in PNG. While the national curriculum includes some facets such as religious instruction, its reach and depth are limited

by resource constraints and variable teacher training. Most civic knowledge is therefore disseminated informally through churches, community leaders, and CSO outreach programs, leaving a comprehensive understanding of political rights and responsibilities uneven across the population. This results in a civic engagement model that is strong on community pragmatism, but weak on broader political empowerment.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score:



Papua New Guinea's digital environment is one that is rapidly evolving amidst various structural and regulatory challenges. While citizens and civil society actors are able to express opinions and engage online, recent digital governance measures including those under the Counter-Terrorism Act 2025 and the National Social Media Policy 2025 have raised concerns about the broad discretionary powers available to authorities and the potential use of existing laws to restrict public discourse. Persistent challenges such as limited internet access, cybersecurity vulnerabilities, and the absence of comprehensive data protection legislation continue to affect the safety and inclusiveness of the digital space.

6.1 | Digital Rights and Freedoms

The government has introduced new digital governance frameworks with the aim of addressing misinformation, disinformation, and online security risks. While these efforts demonstrate a proactive approach to safeguarding the digital space, the resulting policies and laws have also created broad discretionary powers that enable authorities to restrict citizen access to digital platforms, rather than applying targeted measures against genuine threats.

In March 2025, Facebook was blocked nationwide in what the government called a "test" implementation of the new Anti-Terrorism Act, cutting off a vital platform for civic expression and information. While this was a seemingly isolated event and the first of its kind in the history of PNG, statements by the police minister lauding the "successful test" of this new "ICT control system" were viewed as a brazen abuse of power. Despite public outcry following the shutdown, the government has remained silent on the matter, leading many to fear that this device/technology may be used by the government again in the future.

New laws, such as the Counter-Terrorism Act 2025, place caveats on digital rights and freedoms. These are especially problematic where a determination on circumstances that

qualify as terrorist acts under s.28 and s.29 is left to the discretion of the Police Minister and/or the Commissioner of Police. This issue surfaced in the recent killing of civilians during a raid by police personnel. In addition, the newly endorsed National Social Media Policy 2025 introduces sweeping controls over online expression that go beyond legitimate safety concerns. The policy directs the removal, restriction, or banning of accounts that "disclose and disseminate any government sensitive information" and enforces penalties for violations under related laws (Cybercrime Code Act, Digital Government Act). In practice, this means individuals can face sanctions for not only publishing restricted content, but even for re-sharing information already in the public domain. We have already seen this risk materialize in the case of Eddie Tanago; a civil society advocate who was targeted for simply re-sharing content on his personal social media page. This shows how easily punitive enforcement can be triggered by legitimate civic speech or advocacy.

The development of this policy was fast-tracked and endorsed with minimal public consultation with civil society, media, youth groups, or the wider public. While the government narrative surrounding the rollout has emphasized the curbing of misinformation and disinformation, genuine concerns regarding the use of these provisions to justify the introduction of harsher controls on the sharing of information relating to government activities and calls for public accountability, have yet to be addressed. An example of this was the recent arrest of a private citizen in December 2025 for a series of posts he made on Facebook in which he directed questions to the PNG's Minister for State-Owned Enterprises regarding the poor management of a state-owned utility company.

In 2023, it was reported that the Department of Information and Communication Technology (DICT) had worked with Facebook (Meta Platforms Inc.) to take down over 3000 fake/unofficial government accounts since 2020.The DICT minister further announced that they are tracking fake or unofficial government accounts and had established a social media monitoring desk which reported fake accounts, misinformation, disinformation and criminal activity to Meta Platforms, Inc. Although this initiative has been touted as an effort to directly combat misinformation and disinformation on popular social media sites, the full scope of this cooperation between the government and Meta is unclear. DICT has not published any official documentation on their website that defines this cooperation, its objectives, or any obligations between the two parties. Naturally, this raises questions about the state's control over the social media ecosystem and whether this could extend to the silencing of political opponents or other genuine voices that do not fit the prevailing government agenda.

These concerns are further exacerbated by the National Social Media Policy in October 2025. Among other things, this policy restricts access to some social media sites for children under the age of 16 and enforces the use of mandatory digital IDs to access social media sites in country. Most concerning, however, are the requirements for all social media platforms to "register in country and comply with national laws" and the intention to legislate powers allowing the government to affect "social media shutdowns during states of emergency".

While most of these legal and policy measures are still in their infancy, there are growing concerns that they could be weaponized to restrict CSOs, journalists, activists, and political opponents, especially during politically sensitive periods such as elections, national protests, or parliamentary challenges.

6.2 | Digital Security and Privacy

Panel members expressed the view that social media is littered with agents of various powerful figures, both inside and outside of government, who are promoting the agendas of their various principals. Disinformation is rife. However, as Papua New Guineans are becoming more social media savvy, there has been a growing level of scrutiny on the veracity of content, especially on posts that carry political undertones.

On the other hand, the growing risk of digital threats to civil society actors remains. For example, in late January 2025, the IRC (Internal Revenue Commission) experienced a major ransomware attack, which disrupted its networks and email systems, and potentially exposed sensitive taxpayer and corporate data. While a government agency was targeted in this particular case, the incident signals heightened vulnerability of PNG's digital infrastructure and implies similar threats could (and likely do) target CSOs, activists, and their communication platforms.

While Section 49 of the Constitution of Papua New Guinea provides a "reasonable right to privacy" for every individual, there is currently no law on privacy or data protection that provides legal remedies for individuals or organisations (i.e., CSOs) that become victims of hacking, unlawful surveillance, or data breaches. In the face of an ever-expanding digital space, the lack of regulation and enforcement of data privacy and access exposes a critical vulnerability.

In the absence of legislation, Papua New Guinea's safeguards for data protection are guided by the National Data Governance & Data Protection Policy 2024. Specific CSO-targeted campaigns or surveillance of activists via social media have not been widely documented in open reports. However, there are concerns around structural vulnerabilities created by the government through policies such as the Social Media Policy, which now mandates every citizen to create a Digital ID that can be used to track any interactions on the internet and other virtual systems. This could potentially lead to controlling online discourse, discouraging CSO voices, and potentially intimidating activists.

6.3 | Digital Accessibility

Digital technologies such as the internet, livestreaming, Web3 Applications, and Artificial Intelligence are still very much perceived as novelties in PNG, mainly due to the lack of reliable telecommunication networks.

Internet service provider networks and ownership of personal mobile internet devices only became mainstream after the introduction of Digicel in 2007. Internet penetration according to Data Reportal currently only stands around 24% with shortwave radio still regarded as the most reliable means of broadcasting information across rural PNG. In 2024, the entry of internet satellite provider Starlink into PNG was stalled due to a court case brought by the Ombudsman Commission. This legal impasse ultimately forced SpaceX to disable all Starlink satellite services to PNG on 16 December 2025. Although the Ombudsman's reasons for blocking Starlink hinged on the National Information Communication Technology Authority's purported "non-compliance with licensing requirements", licensing for other low earth orbit satellite broadband services have progressed during this time.

While there has been an increased uptake of digital technologies among CSOs, this is limited by the lack of accessible to a reliable internet connection in most of PNG's rural areas. For the

most part, CSO outreaches into the rural communities are limited to physical gatherings, with important information being imparted to participants via the use of printed materials.

C) Recommendations

Given the nature of challenges to PNG's Enabling Environment, recommendations to the government, donors/international community and civil society actors seeking to improve conditions are as follows:

Government

- Support the development of national curriculum on digital citizenship.
- Review and amend the Cybercrime Code Act.
- Establish a National Human Rights Mechanism.
- Establish a standard list of expectations for a consultation to be deemed successful, including evaluating and reporting on how civil society input was considered.
- Increase avenues for CSOs to participate in national budget formulation.
- Amend the Associations Incorporation Act to provide an administrative appeal option when an association is deregistered so that it is not necessary to go to the District Court.
- Complete the drafting of the Associations Incorporation Regulations.
- Enact the Right to Information Legislation.
- Create more visibility on the processes stipulated under the Peace and Order Act 1991 to ensure that permission to hold public gatherings/protests is granted and is reflective of citizen's constitutional right to freedom of assembly.
- Ensure government partnership programmes with civil society and any associated funding structures are designed in a manner that preserves independence of civil society and are based on impartial and transparent criteria.
- Avoid internet shutdowns and show a clear legal basis and the necessity and proportionality of any other restrictions on public forums and internet access, in alignment with constitutional and international law obligations.
- Adopt a proportionate and risk-based approach to AML/CFT in the non-profit sector.

Donors/International Community

- Support the creation of Human Rights Defenders networks in PNG.
- Support pro-bono legal assistance programmes for Human Rights Defenders.
- Support initiatives and programmes which prioritise needs identified by local actors and aligned with shared development objectives.
- Collaborate with local groups to ensure accountability for multinational corporations and other private sector actors whose actions negatively impact civic space in PNG.

- Provide independent oversight on PNG's compliance with international obligations and commitments such as OGP, UN Convention against Corruption, ICCPR, etc.
- Provide technical capacity support in relevant areas, such as:
    - To PNG law enforcement on policing public gatherings and on appropriate use of force during riots, so the occurrence of riots is not used as a reason for limiting peaceful assemblies.
    - To the PNG government on ensuring a proportionate and risk-based approach to AML/CTF for the non-profit sector and in adopting guidance for banks to prevent the application of generalised measures to all civil society groups.
    - Training on non-violent collective action for civil society organisations.

Civil Society Actors

- Use legal action to build on case precedents, e.g. right to information disclosures.
- Partner with global firms that can provide pro bono legal assistance.
- Conduct legal risk analysis for advocacy activities.
- Provide public information materials on citizens' digital rights.
- Work with established regional and international rights networks.
- Share with each other all written feedback submitted to government.
- Build stronger coalitions of CSOs that foster shared learning that informs, mobilizes and takes action on issues of national concern.
- Actively speak out on human right violations.

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 report was convened in August.** 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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