

Kyrgyzstan

Country Focus Report

2026



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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:

SIX ENABLING PRINCIPLES



Respect and Protection of Fundamental Freedoms



Supportive Legal and Regulatory Framework



Accessible and Sustainable Resources



Open and Responsive State



Supportive Public Culture and Discourses on Civil Society



Access to a Secure Digital Environment

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

Period covered by this report: May 2025 – May 2026

Kyrgyzstan has a strong civil society tradition. Civil society organisations (CSOs), including community groups, rights-based organisations, service providers, independent media, professional associations and civic initiatives, continue to support communities, provide services, monitor public policy and defend rights. Many CSOs still work with citizens and local authorities on social protection, education, health, disability inclusion, gender-based violence, local development and access to information.

At the same time, the wider context has become more restrictive. Since the [2021 constitutional referendum](#), Kyrgyzstan has moved away from the more pluralistic parliamentary model that followed the 2010 revolution and towards a stronger presidential system. This shift has concentrated decision-making power in the executive, weakened parliamentary checks and reduced the role of political parties as channels for representation. The authorities have framed centralisation as necessary for stability, efficiency and public order, but in practice it has narrowed space for opposition politics, independent media and civic oversight. The snap [parliamentary election](#) of 30 November 2025 took place in a restrictive political environment, with limited space for opposition activity and low voter turnout. These political trends shaped the conditions in which CSOs, media actors and public institutions worked during the reporting period.

The assessment period saw civil society come under new pressure. The authorities applied the [Law on “Foreign Representatives”](#), tightened media and internet [regulation](#), kept long-running [restrictions](#) on peaceful assemblies in central Bishkek, and used security and extremism [laws](#) against journalists, activists and online speakers. These steps did not stop all civil society activity: many CSOs continue to provide services, support communities, monitor public policy and engage with local authorities. However, the overall enabling environment has become more restrictive, selective and risk-heavy. Service-oriented and community-based work remains more possible, while advocacy, public oversight, human rights, anti-corruption, independent media, gender equality and LGBTQIA+ work faces higher legal, financial and reputational risks. As a result, many organisations have lowered their public profile, softened their language or reduced visible engagement on sensitive issues.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score: 2/5 ¹



The score for this principle reflects a repressed civic space. Kyrgyzstan's [Constitution](#) guarantees key civic freedoms, including freedom of expression in Article 32, the right to seek and receive information in Article 33, freedom of association in Article 36 and freedom of peaceful assembly in Article 39. In practice, the authorities have narrowed these freedoms through laws, court orders, criminal cases, media restrictions, digital controls and public-order arguments.

1.1 | Freedom of association

Freedom of association is disabling for a growing part of civil society. Article 36 of the [Constitution](#) protects everyone's right to freedom of association. However, [Law](#) No. 72 amended the Law on Non-Commercial Organisations and introduced the category of a non-commercial organisation "performing the functions of a foreign representative". The law applies to non-commercial organisations that receive foreign funding and engage in broadly defined "political activity", including activity aimed at influencing state decisions or shaping public opinion for that purpose.

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

The law created a special registration, reporting and oversight regime for affected organisations. It gives the authorised registration body powers to request governing and financial documents, obtain information from other state bodies and, after warnings, seek suspension or liquidation through court procedures. Cabinet of Ministers [Decree](#) No. 518 further regulates the public register and inspections of organisations classified as “foreign representatives”. [Legal analysis](#) of these instruments found that the definitions are vague and the inspection powers broad, creating a risk of arbitrary interference with association rights.

These rules do not affect all CSOs equally. Service-oriented organisations that avoid policy advocacy can often continue their work. Organisations that monitor public authorities, support independent media, or work on elections, anti-corruption, gender equality, LGBTQIA+ rights, disability rights, human rights or public accountability face higher scrutiny. The special label also reinforces public suspicion towards foreign-funded CSOs and encourages self-censorship, changes to statutes and lower public visibility.

1.2 | Freedom of peaceful assembly

Freedom of peaceful assembly is also disabling in practice. [Article 39 of the Constitution](#) protects peaceful assembly, and the [Law on Peaceful Assemblies](#) permits restrictions only on lawful grounds, including where a court finds an unlawful purpose or a threat to national security, public order or the rights and freedoms of others. Despite these safeguards, the authorities have normalised broad, repeatedly extended restrictions to peaceful assemblies in central Bishkek.

The Pervomaisky district [restrictions](#) began in 2022 and have been repeatedly extended. The most recent [extension](#) covered 1 January to 31 March 2026 and prohibited assemblies across the district, except for official state and municipal events in Ala-Too Square, while directing other assemblies to Maxim Gorky Park. The stated justification was public order and the prevention of mass disorder. In practice, repeated blanket restrictions prevent CSOs, activists and community groups from reaching decision-makers and the public in central symbolic locations.

A [draft amendment](#) to the Law on Peaceful Assemblies in 2026 raised further concerns because it would expand local authorities’ ability to designate or restrict places for assemblies. If adopted, such amendments would make it easier to move protests away from their intended audience and would further weaken the practical value of Article 39.

1.3 | Freedom of expression

Freedom of expression has deteriorated in Kyrgyzstan. Article 32 of the [Constitution](#) protects freedom of thought, opinion and expression; Article 33 protects access to information; and the Constitution prohibits censorship of the mass media. In practice, the authorities expanded regulatory control over media and civic information spaces during the reporting period.

On 6 August 2025, the president [signed](#) the new Mass Media Law. The [law](#) requires media outlets, including online platforms, to register with the authorities and limits foreign ownership to 35%. It also expands the state’s ability to register, re-register and terminate media entities. These powers can be used to delay registration, deny status to critical platforms or pressure them through the threat of termination.

In October 2025, a court [declared](#) Kloop, Temirov Live and AitAit Dese “extremist organisations”. The decision banned their activities and required online resources and social media pages to be blocked. This measure directly affected independent investigative and civic information work and created wider risks for journalists, sources, audiences and CSOs that share public-interest information.

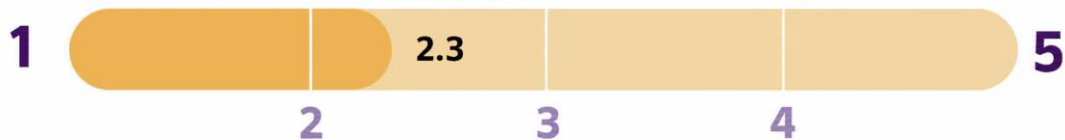
The authorities also use broad criminal and security provisions against expression. Article 278 of the Criminal [Code](#), which covers public calls for active disobedience or mass riots, has been [used](#) against online speakers and activists. [Amendments](#) to the Law on Countering Extremist Activity raised additional concern because vague terms can capture speech, media work and civic advocacy that should be protected under constitutional and international standards.

Trend: The situation under Principle 1 has deteriorated. Fundamental freedoms remain formally protected, but the authorities increasingly combine association rules, protest restrictions, media regulation, extremism measures and criminal cases to constrain independent civic action.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score: 2.33/5



The legal and regulatory framework is disabling, although CSOs can still exist and register. The strongest pressure comes from the combination of formal legal amendments, broad administrative discretion and informal political signals. The registration environment remains partially accessible, but the operational environment and protection from interference are weak.

2.1 | Registration

CSOs can still register as legal entities in Kyrgyzstan. The main legal framework includes the [Law on Non-Commercial Organisations](#), general rules on state registration of legal entities, and the 2026 [Regulation on state registration of legal entities, branches and representative offices](#), approved by Cabinet of Ministers Resolution No. 257 of 17 April 2026. Under the new regulation, CSOs register as legal entities with the Ministry of Justice and its territorial registration bodies through entry into the Unified State Register of Legal Entities, Branches and Representative Offices. The Ministry of Justice is required to process registration applications within 3 working days for standard legal entities and within 10 working days in cases requiring additional review or correction of documents. The regulation also covers re-registration and liquidation procedures. While the legal timelines have formally shortened compared to previous practice, civil society representatives report that in practice, registration may still take longer due to repeated requests for amendments to statutes,

additional scrutiny of objectives and activities, and informal consultations with officials, particularly for organisations working on sensitive issues such as human rights, anti-corruption or media freedom.

This formal access to registration explains why the panel did not consider the process fully disabling. The state has not banned CSOs from registering, and appeal mechanisms formally exist. CSOs can challenge refusals, delays or other decisions of the registration authority through administrative complaints and judicial procedures. However, these mechanisms are only partly functional in practice. Administrative review remains within the executive system, while court proceedings can be slow, costly and unpredictable, particularly where registration issues concern politically sensitive objectives, names or activities. As a result, appeal mechanisms provide a formal route for challenge, but they do not always offer timely or effective protection for CSOs.

At the same time, registration is no longer fully predictable for CSOs working on sensitive issues. The panel reported bureaucratic obstacles, repeated document revisions, delays caused by comments on statutes or organisational purposes, and added legal costs. The 2026 regulation also introduced requirements on beneficial ownership disclosure requirements for legal entities more broadly, not only for CSOs. This creates uncertainty for CSOs because they do not have owners, shares or profit distribution in the same way as businesses do. Instead, CSOs usually exercise control through boards, founders or management bodies rather than ownership structures, making the application of beneficial ownership rules less clear in practice.

The panel also gave a recent anonymised example of how informal political signals can affect registration practice. After the president [publicly stated](#) that only state bodies should fight corruption, the Ministry of Justice asked one anti-corruption CSO to remove “anti-corruption” from its name and statutory activities. The panel reported that the ministry then became reluctant to register CSOs whose statutes include anti-corruption work. No new law, decree or other formal rule created this restriction. Officials appeared to act on a presidential statement as if it had regulatory force. This practice creates uncertainty for watchdog and accountability organisations. It also conflicts with the [Law on Countering Corruption](#), which recognises civil society institutions and individuals as actors in countering corruption within their powers.

Registration therefore remains possible, but it is no longer fully accessible or predictable. CSOs working on anti-corruption, human rights, independent media, gender equality, election monitoring or other watchdog issues face more scrutiny and weaker legal certainty than service-oriented organisations.

2.2 | Operational environment

The general legal framework still allows CSOs to choose their internal governance, goals and activities. CSOs do not need routine prior approval for every ordinary activity or project. Yet the state has reduced this autonomy through the Law on “Foreign Representatives” and its implementing rules: Law No. 72 of 2 April 2024 requires CSOs that receive foreign funding and engage in broadly defined “political activity” to register as “foreign representatives”. [ICNL found](#) that the law imposes burdensome requirements, gives state bodies powers to interfere in internal affairs, and creates a special registration regime for foreign-funded CSOs engaged in political activity.

The law does not create a classic permit system for all CSO activities. It creates a legal and administrative risk that CSOs must assess before they act. Foreign-funded CSOs working on advocacy, accountability, human rights, media, gender equality, election monitoring or other sensitive issues must decide whether their work could be treated as “political”, whether they must register, and what penalties may follow if they do not. The [Venice Commission](#) noted that the law introduced a new category of CSOs “performing functions of a foreign representative” and a system of control by the Ministry of Justice. It also noted that “political activity” includes influencing decisions by state bodies and forming public opinion for that purpose.

Cabinet of Ministers [Decree No. 518](#) of 27 August 2024 deepened state control over organisations registered as “foreign representatives” by establishing a detailed system of registration, reporting and inspections. The regulation covers the register of “foreign representatives” and inspections of their activities. The expert panel noted that the regulation allows broad checks, audit demands, disclosure duties and requests for internal and financial information. Operational uncertainty is also reinforced by the unclear application of beneficial ownership disclosure rules to CSO governance, as explained above under 2.1.

The operational environment also limits public advocacy. Courts have repeatedly extended [bans](#) on peaceful assemblies in central Bishkek since 2022. These bans do not close all civic space, but they restrict a key tool for advocacy, public mobilisation and public accountability. In 2025 and 2026, assemblies remained prohibited in key central and symbolic locations, while protests were redirected to Maxim Gorky Park, reducing their visibility and proximity to decision-making institutions.

Expert inputs show how these pressures affect daily work. The panel reported that some CSOs avoid public advocacy, soften terms such as “rights”, “advocacy”, “gender equality” and “anti-corruption”, or remove such terms from statutes and public materials. One anti-corruption CSO closed a small-grants programme for regional anti-corruption monitoring because potential applicants feared the consequences of taking part. A non-commercial membership-based association lost many members after entering the register of “foreign representatives”, illustrating the reputational and operational impact of the designation.

The panel also reported emerging informal coordination practices. During preparations for a local event involving state and municipal bodies, local self-government representatives said that such activities should now be coordinated with the local branch of the State Committee for National Security. This does not appear to be a formal legal requirement for all CSO activities. It does show that security-service oversight can affect public-facing CSO work at local level.

These measures do not amount to a general ban on CSO work: CSOs can still run projects, provide services and work with communities. However, the combined effect of special registration, labelling, reporting, audits, inspections, banking checks, assembly restrictions and informal security coordination has made foreign-funded advocacy work much harder.

2.3 | Protection from interference

Protection from interference is weak. The [Constitution](#) and civil legislation formally protect legal personality and the right to association, but recent rules give public bodies broad scope to scrutinise internal documents, finances, communications and activities. The “foreign

representatives” framework allows the state to treat ordinary advocacy, public education and policy engagement as political activity when foreign funding is involved.

[Law No. 72](#) created a special control regime for foreign-funded CSOs engaged in broadly defined “political activity”. The [Venice Commission](#) found that the law creates a serious risk of arbitrary interference with freedom of association and recommended that Kyrgyzstan repeal or fundamentally revise it. The commission also warned that long appeal procedures can cause the de facto disappearance of an organisation if the state freezes accounts, imposes fines or suspends activities before a court resolves the case.

[Decree No. 518](#) further weakens protection from interference. It allows inspections, requests for internal documents, and review of financial and organisational information, and checks on whether CSO activities match statutory goals. These powers can become tools of control rather than proportionate oversight. The expert panel reported that CSOs working on sensitive issues face higher risks of inspections, forced changes to activities, suspension and pressure through financial or administrative channels.

Under Law No. 72 and its implementing Regulation (Cabinet of Ministers Decree No. 518), the Ministry of Justice has the legal power to suspend the activities of a CSO classified under the “foreign representatives” framework for up to six months before a court reviews the matter. An appeal does not automatically stop enforcement, and suspension can restrict access to bank accounts. During the reporting period, this appeared primarily as a credible enforcement threat rather than a publicly documented practice applied to specific CSOs. Even as a threat, it creates a strong pressure point: a CSO may avoid sensitive advocacy or foreign-funded work because suspension could lead to the loss of staff, funding, partners and trust before any later court review.

The wider legal environment also shows how the state can use courts and other legal tools to close or silence civic actors. In July 2025, a [court ordered](#) the closure of the independent broadcaster Aprel TV and the end of its broadcasting and social media operations after prosecutors claimed that its coverage undermined state authority. In October 2025, a [court banned](#) Temirov Live and AitAit Dese, thus targeting leading independent media outlets shortly before a snap parliamentary election.

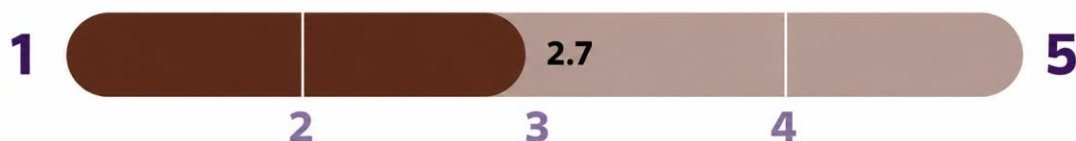
The panel also reported that interference does not always take the form of formal closure. Some CSOs chose to end their work voluntarily rather than operate under legal uncertainty, rising reporting duties and the risk of being labelled “foreign representatives”. Other organisations left the non-profit field and re-registered or re-emerged as commercial consulting or service entities so that they could keep providing expertise with less regulatory exposure. Experts also reported internal splits in active CSOs: some staff left civic activism for consulting or other private-sector work, while others stayed. These cases show how pressure can weaken CSOs without a court order.

The assessment of the enabling environment for Principle 2 therefore reflects a mixed but clearly worsening picture: CSOs can still register and operate, yet the law gives state bodies broad tools to monitor, inspect, suspend and stigmatise organisations that receive foreign funding or work on public policy. The state has also used media, extremism and administrative tools against watchdog actors. Thus, the enabling environment for association has moved beyond ordinary regulation into a disabling framework for many independent and rights-based CSOs.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score: 2.75/5



Resources remain accessible to many CSOs, but they are increasingly less stable, less flexible and costlier to manage. The environment is close to partially enabling for established organisations with donor relationships, but disabling for smaller, regional, grassroots and sensitive-issue CSOs.

3.1 | Resource accessibility

CSOs in Kyrgyzstan can still access funding and non-financial resources. International donors remain the main source of support for many organisations, and information about calls for proposals is usually available through donor websites, mailing lists, CSO networks and partner organisations. Larger CSOs in Bishkek and Osh can still track opportunities, prepare applications and manage donor reporting.

However, access has become increasingly uneven. Smaller, regional and grassroots CSOs face language barriers, complex application forms, weak fundraising skills, limited digital skills and fewer links to donors. These barriers make it harder for them to compete with

larger organisations. The gap is wider outside Bishkek and Osh, where CSOs also have less access to legal, audit, accounting and grant-writing support.

The “foreign representatives” framework has made foreign funding more sensitive. Law No. 72 does not ban foreign funding, but it creates extra reporting duties and gives the state broader oversight powers over foreign-funded CSOs engaged in “political” activities. [Reuters reported](#) that the law introduced stricter rules for foreign-funded non-governmental organisations, required extra reporting from organisations involved in political activities and gave authorities broader oversight powers. This has made CSOs more cautious when they apply for grants linked to advocacy, human rights, media freedom, anti-corruption, gender equality, election monitoring, LGBTQIA+ issues or public accountability.

Most of this legal risk falls on domestic CSOs operating under Kyrgyz law, rather than on donors based outside the country. As a result, some organisations need not only funding, but also legal advice, compliance support and safer grant structures that allow them to continue public-interest work without increasing their exposure to registration, reporting or inspection risks. The panel also highlighted that some organisations avoid foreign-funded advocacy grants, soften project language or shift away from public-facing work to lower the risk of being treated as “political”. These choices do not mean that funding has disappeared. They show that legal and reputational risk now shape which funding CSOs seek and how they design projects.

External funding also became less predictable. In April 2024, [Open Society Foundations](#) (OSF) announced that it would close its branch in Kyrgyzstan after the adoption of the new law, which it described as imposing restrictive, broad and ill-defined rules on internationally funded local organisations. The OSF closure removed a long-term source of support for civil society. The 2025 cuts to US-funded assistance were another shock. [The Diplomat](#) reported in March 2025 that, if leaked lists were accurate, almost all United States Agency for International Development programmes in Central Asia had been cut. These cuts affected the wider donor environment and increased competition for the remaining grants.

Domestic funding does not fill this gap. CSOs can use membership fees, small donations, local philanthropy, service contracts, state social procurement and occasional support from businesses or local authorities. Yet these sources mostly support social service delivery and community development. They rarely support watchdog work, anti-corruption, independent media, LGBTQIA+ rights or other sensitive public-interest activities. [ICNL notes](#) that Kyrgyzstan has a state social procurement framework through which CSOs can provide public-benefit services, but this mechanism remains relevant mainly to service delivery rather than to independent oversight or advocacy.

CSOs also face banking and financial-service barriers. Banks increasingly ask questions about grant agreements, budgets and beneficial ownership. These checks are harder for CSOs to navigate because beneficial ownership concepts do not map neatly onto non-commercial governance structures. They affect smaller organisations most, because those organisations have fewer administrative staff and weaker access to legal advice.

3.2 | Resource Effectiveness

Resources remain usable, but CSOs use them in a less flexible and less efficient way than before. Donor–CSO relationships remain mostly collaborative. The panel did not find that donors routinely interfere in CSOs’ internal governance or mission. Many donors still discuss

risks with grantees and allow changes in activities, wording or formats when the environment becomes more sensitive. This keeps the effectiveness score in the partially enabling range.

Still, most funding remains project based. Grants often cover short cycles, narrow outputs and detailed reporting instead of core costs and long-term institutional needs. This limits CSOs' ability to retain staff, invest in systems, support regional partners or react quickly to new risks. It also favours larger CSOs with stronger finance and reporting teams.

The legal environment also affects how CSOs use resources. The "foreign representatives" law does not always block funding, but it changes how CSOs and donors manage grants. Organisations spend more time on legal review, audit preparation, documentation, communications checks and risk management. This reduces the time and money available for programme work. It also pushes some CSOs to avoid terms such as "advocacy", "rights", "gender equality" or "anti-corruption" in public materials or project documents.

Donors have tried to adapt, but their responses remain uneven. Some donors allow grantees to revise activities, change public wording or move activities into lower-risk formats. While others continue to use strict reporting and output rules that do not reflect the risk level in the country. This creates a mixed environment: donors often respect CSO autonomy, but the funding terms do not always give CSOs enough flexibility or protection to work safely in a restrictive civic space.

The contraction of major donor programmes also affects effectiveness. When funding becomes shorter and less predictable, CSOs spend more time fundraising and less time implementing programmes. They may also choose safer projects over more needed but more sensitive work. This does not make resources unavailable, but it reduces their impact.

3.3 | Resource Sustainability

Sustainability is the weakest dimension of Principle 3 reflecting serious limits on long-term planning. Most CSOs still depend on short-term international project grants. Domestic philanthropy, volunteer work, paid services, membership fees and social enterprise models exist, but they rarely cover salaries, rent, accounting, security, communications or compliance costs.

The first pressure on sustainability comes from regulation. Law No. 72 and Decree No. 518 increase fixed costs for CSOs that receive foreign funding and work on public policy or public opinion. CSOs must manage more reporting, audit, labelling and inspection risks. These duties are especially hard for regional organisations because audit, legal and accounting services remain more concentrated in larger cities.

The second pressure comes from donor contraction. As noted above, the closure of the Open Society Foundations' national foundation branch and the 2025 disruption of USAID-backed programmes reduced the availability of flexible and multi-year support. This did not eliminate international funding, but it made the resource environment less predictable, especially for watchdog, rights-based, regional and smaller CSOs.

The panel found that these pressures already affect organisations. Some CSOs reduced or closed programmes, avoided sensitive grants, moved towards lower-risk service delivery, or reduced public advocacy. Some organisations struggled to retain staff because project

pipelines became shorter and less predictable. Regional CSOs faced stronger risks because they have fewer donor links, weaker fundraising capacity and higher relative compliance costs.

The overall resource picture is therefore fragile. CSOs can still access funds, training, networks and donor support. But they cannot count on stable, flexible and long-term resources. The environment remains partially enabling only for organisations that can manage legal risk, donor compliance and funding uncertainty. For smaller, regional and rights-based CSOs, resource sustainability is close to disabling.



PRINCIPLE SCORE

4. Open and Responsive State

Score: 2.4/5



The state remains partly open through formal access-to-information rules, public councils and digital portals. However, participation and accountability have weakened, especially when decisions concern civic space, media freedom, public oversight, elections, equality or security.

4.1 | Transparency

Kyrgyzstan has a formal legal framework for access to information. [Article 33 of the Constitution](#) protects the right to seek and receive information. The [Law on the Right of Access to Information](#) entered into force in January 2024 and gives individuals and organisations the right to request information from public bodies. The [Centre](#) for Law and Democracy notes that the law gives “everyone” the right to access information held by public bodies and has improved Kyrgyzstan’s [RTI Rating score](#) from 87 to 103 out of 150.

The law includes several positive features. Requests do not need to be justified and can be submitted on paper or electronically; public bodies must generally respond within 10 business days. These rules help CSOs, journalists and citizens to request documents, monitor public spending and check how public bodies act.

The state also maintains some digital tools for transparency. The [Open Budget Portal](#) gives online access to budget data. The [public discussion portal](#) allows users to review draft legal acts and submit comments. The [Open Budget Survey](#) 2023 gave Kyrgyzstan a transparency score of 61 out of 100, meaning that the country publishes enough budget material to support informed public debate, but still has gaps in the timing and content of some key budget documents, such as the quality and completeness of the information.

However, implementation remains uneven. Public bodies may delay responses beyond the formal deadline, give incomplete answers, redirect requests between institutions or reply in a formalistic way. Information on sensitive issues is harder to obtain. This includes information on procurement, law enforcement, state-owned enterprises, public appointments and implementation of major policy decisions. Transparency also varies by level of government: national portals provide more information than many local institutions.

The appeal system also remains weak when disclosure is denied. Formal routes exist through internal review, the Ombudsman and courts, but CSOs cannot always rely on these tools to obtain a timely disclosure. Kyrgyzstan does not have a dedicated information commissioner with binding powers. As a result, the practical value of access-to-information rights is limited when public bodies refuse, delay or narrow responses.

Hence, transparency is partially disabling: Kyrgyzstan has laws and tools that support access to information, but these tools do not work consistently enough to make the environment enabling. CSOs can obtain some information, but they face gaps, delays and weak remedies, especially when they seek data on politically sensitive issues.

4.2 | Participation

Formal participation channels still exist. CSOs can take part in public councils, parliamentary hearings, sectoral working groups, budget discussions and online consultations on draft laws. In less sensitive areas, such as social services, health, education, disability inclusion, local development and community work, CSOs still work with public institutions and local authorities: the state occasionally invites CSOs to provide expertise in areas where its own knowledge is more limited, or to help with implementation.

By contrast, participation becomes much weaker when decisions affect civic space, media freedom, human rights, anti-corruption, elections or public oversight. The panel found that authorities often consult CSOs late, give limited time for comments or treat participation as a formality. CSOs that the state sees as critical have less access to decision-makers than service-oriented, neutral or government-aligned organisations. This means that participation has not disappeared, but it has become more clearly selective and uneven.

Recent legislative processes show this pattern. The Law on “Foreign Representatives” passed despite strong concerns from civil society and international actors. Legal experts and media watchdogs [warned](#) that the law could be used to suppress independent journalism and that the Media Policy Institute urged the president not to approve it. The law was still passed and entered into force.

Changes to the law-making process also weaken participation. [ICNL reports](#) that March 2025 amendments to the Law on Normative Legal Acts reduced the standard public consultation period from 30 days to 15 days, and in some cases to 10 days, and allowed consultations to be skipped if the president declares an issue urgent. Shorter or skipped consultations reduce the time for CSOs to prepare comments. They also make it harder to track whether public bodies assess those comments in good faith.

The decline of open-government mechanisms also reduced space for participation. Kyrgyzstan became [inactive](#) in the Open Government Partnership (OGP) in May 2024 after it [failed to submit](#) new action plans for two consecutive cycles, reportedly due to the absence of sufficient national funding to sustain the process. OGP now [lists](#) Kyrgyzstan as withdrawn and notes that it was a member from 2017 to 2025. This matters because OGP had offered a structured platform for the state and civil society to plan reforms together. Its loss removed one important channel for dialogue and joint commitments.

Therefore, participation is disabling because while CSOs still take part in some processes, they often cannot influence outcomes on sensitive issues. The state allows participation more readily when CSOs provide services or technical input. It restricts meaningful participation when CSOs challenge power, defend rights or demand oversight.

4.3 | Accountability

Accountability is the weakest dimension under Principle 4. The state does not consistently explain how it uses CSO input. Public bodies rarely publish clear response matrices or other documents that show which recommendations they accepted, rejected or used in final decisions. When they reject CSO input, they often do not give a detailed public reason.

This problem goes well beyond weak participation. CSOs can submit comments, attend hearings and provide expert analysis, but they rarely receive clear follow-up. Feedback is more common in technical or service-delivery areas. In sensitive areas, such as media regulation, anti-corruption, human rights, gender equality, elections and CSO regulation, feedback often remains minimal or absent.

The 2025 [Mass Media Law](#) illustrates this weak feedback loop. Journalists, legal experts and rights groups raised concerns before the law entered into force. Reuters [reported](#) that critics warned that the law could suppress dissent and limit independent journalism, while rights groups said it violated international freedom of expression standards. The law still moved forward, and the authorities did not provide a clear public account of how they had addressed or rejected these concerns.

The same problem appears in the “foreign representatives” framework. Civil society and international organisations raised serious [concerns](#) before and after adoption. Yet the authorities proceeded with the law and then adopted implementing rules that expanded reporting, audit and inspection risks. This pattern shows that the state may receive input but does not consistently account for how it uses that input.

The withdrawal from OGP further reduced follow-up spaces. OGP processes used to create public commitments, monitoring and reporting. Without this framework, CSOs have fewer structured routes to ask the state to explain progress, delays or refusals. They must rely more on ad hoc advocacy, access-to-information requests, public pressure or court action.

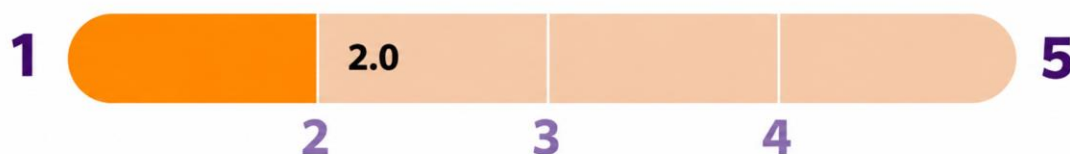
The situation under Principle 4 has deteriorated. The state still maintains some transparency and consultation tools, but the space for meaningful participation and accountability narrowed during the reporting period.



PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score: 2/5



5.1 | Public discourse and constructive dialogue

Public discourse on civil society has become more polarised and less constructive. Service-oriented CSOs still receive some public recognition, especially when they help vulnerable groups or support local development. But CSOs that monitor the state, defend rights or influence policy face more suspicion. This explains why the panel scored this dimension as disabling.

The Law on “Foreign Representatives” has strongly shaped this discourse. The [Venice Commission](#) found that the term “foreign representative” has negative and stigmatising connotations. It noted that the label suggests that affected non-commercial organisations serve foreign states or organisations rather than the country and its people, and that it is likely to stir distrust and suspicion against them. The commission also warned that such labelling can damage the reputation and actual activities of CSOs.

This legal label has practical effects. It makes it easier for officials, public commentators and some media actors to frame independent CSOs as outsiders or agents of foreign influence. This does not affect all CSOs equally. It mostly affects organisations that receive foreign funding and work on public policy, human rights, anti-corruption, gender equality, election monitoring, independent media and public accountability.

The wider public discourse also reflects direct pressure from political leaders and state-linked narratives. [BTI 2026](#) reports that Kyrgyzstan's leaders have disparaged civil society actors as unpatriotic, self-serving, grant-seeking collaborators of foreign sponsors. It also notes that civil society and media actors have faced legal and propaganda-based pressure, while organised civic groups have had only limited success in influencing restrictive laws.

Independent media cases further weaken constructive dialogue. In October 2025, a court banned Kloop, Temirov Live and AitAit Dese as “extremist organisations”. [Reuters](#) reported that this was the first ruling of this kind against journalists and media outlets in Kyrgyzstan and that it banned these organisations' websites shortly before a snap parliamentary election. This matters for public discourse because these platforms helped to shape civic debate, investigative reporting and public accountability.

The panel found that these trends affect CSOs' behaviour. Some organisations avoid words such as “rights”, “advocacy”, “gender equality” or “anti-corruption” in public materials. Others reduce public statements, avoid direct criticism or move discussions into closed formats. This does not mean that dialogue has disappeared, as CSOs still communicate with communities and some public bodies, but dialogue is safer for service delivery than for watchdog, rights-based or political accountability work.

Hence, there is a disabling discourse for sensitive civic work. The state does not fully silence all CSOs, but official and public narratives make it harder for independent organisations to speak, build trust and engage openly.

5.2 | Perception of civil society and civic engagement

Public perception of civil society remains mixed. Many people value CSOs when they see direct benefits, such as help with social protection, disability inclusion, education, health, humanitarian aid, local infrastructure or legal advice. Community-based civic engagement also continues through volunteering, local initiatives, informal mutual aid and issue-based mobilisation.

At the same time, citizens are more cautious about visible engagement with organisations that the state presents as “political” or foreign funded. The “foreign representatives” label, media pressure and legal cases against civic actors have weakened trust in parts of civil society. This affects beneficiaries, partners and local officials, who may avoid public cooperation with sensitive CSOs even when they value their work privately.

Kyrgyzstan still has a culture of volunteering and mutual support, but much of it remains focused on less political forms of civic action. A 2023 [study](#) on volunteering in Kyrgyzstan found that volunteer activity focused mostly on charity, social protection, ecology, education, emergency response and civic activism. Charity and social protection are the areas where volunteering was the strongest, while civic activism was noted as less common than several

service-oriented fields. This supports the panel's view that social engagement exists, but that citizens are less likely to engage visibly in advocacy or accountability work.

Public attitudes toward democracy and civic influence are also uneven. BTI 2026, drawing on IRI polling, [reports](#) that many citizens say democracy is developing well and that democracy is the best form of government. At the same time, the same polling showed high approval of strong leaders and heavy-handed action by the State Committee for National Security, even where due process was weak. BTI describes this as a mismatch between support for democratic empowerment and support for undemocratic but “decisive” governance.

This mixed attitude affects civic engagement. Citizens may support the idea of voice and participation, but fear, distrust and support for strong state action can reduce willingness to engage with independent watchdog CSOs. The panel reported that some partners, beneficiaries and local actors now avoid public association with organisations working on anti-corruption, human rights, media, gender equality or LGBTQIA+ issues.

Citizens still engage in community life, volunteering and service-oriented activities. Yet visible participation in public advocacy and independent civic action is constrained by stigma, fear of state attention, reputational risks and concern about being associated with “political” or foreign-funded activity. The environment is therefore not closed, but it does not support broad, visible and confident civic engagement.

5.3 | Civic Equality and Inclusion

Kyrgyzstan has active women's organisations, disability rights groups, youth initiatives, community-based groups and service CSOs. These actors work with communities and sometimes with public institutions. Formal equality commitments also exist in law and policy. However, equality in civic participation remains limited. Women, persons with disabilities, rural communities, linguistic minorities, LGBTQIA+ people, people living with HIV, sex workers, drug users and other marginalised groups face different barriers to participation. These barriers include stigma, poverty, weak access to information, safety concerns, limited digital access, language gaps and fear of public visibility.

Gender equality remains a major challenge as highlighted by the UN Women's 2025 Country Gender Equality Profile. Gaps persist in women's economic empowerment, labour market participation, public life, violence against women and girls, social protection, health, education, climate and digital inclusion. These affect civil society because women's groups need to work in a context where inequality remains deeply structural and social.

Persons with disabilities also face barriers to equal participation. While Kyrgyzstan ratified the Convention on the Rights of Persons with Disabilities (CRPD) in 2019, the UN and development partners continue to stress the need for inclusive environments, accessible infrastructure and stronger participation of persons with disabilities: For instance [UNDP](#) noted in 2025 that though CRPD ratification created legal commitments to ensure full participation in society through inclusive environments and accessible infrastructure, there have been challenges. These have included a lack of accessible infrastructure, inclusive information, sign-language interpretation, reasonable accommodation and uneven direct participation in decision-making processes. As a result, disability rights organisations often spend resources overcoming access barriers before they can influence policy. The

[UNPRPD](#) also points to gaps in access to justice, local-level awareness and implementation of disability rights.

LGBTQIA+ civic actors face a particularly restrictive environment. In 2023, Kyrgyzstan adopted amendments to child protection legislation that restrict information on sexual orientation and gender identity. The [amended law prohibits](#) sharing of information on diverse sexual orientation and gender identity under the label of “promotion of non-traditional sexual relations” and [bans](#) dissemination of information about LGBTI people, rights and identities among minors. This pushes LGBTQIA+ organisations and allies toward self-censorship and lower visibility.

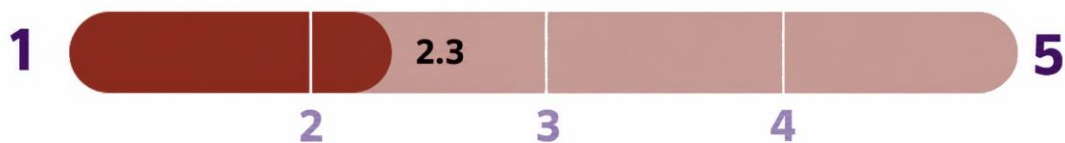
The panel found that inclusion also varies by geographically. CSOs in Bishkek and Osh have better access to donors, networks, legal support and digital tools. Rural and remote groups face more costs, weaker connectivity, fewer trained staff and less access to decision-makers. Marginalised people outside major cities therefore have fewer safe channels to join civic life or shape CSO agendas.

The situation under Principle 5 deteriorated over the reporting period. as service-oriented civil society remains socially accepted, but public discourses and structural barriers increasingly disable visible, rights-based and inclusive civic engagement.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score: 2.33/5



The digital environment remains mixed. Internet access is broad and CSOs continue to use online tools for outreach, services and coordination. However, online expression, digital security and privacy have become less safe because of blocking powers, media restrictions, prosecutions linked to online speech, state control over internet infrastructure and weak cybersecurity capacity.

6.1 | Digital rights and freedoms

The panel scored digital rights and freedoms as disabling. This reflects a serious decline in online freedoms, but not a fully closed digital space. Citizens and CSOs can still express political views online, and the state does not routinely shut down the whole internet. However, online expression has become much riskier, especially for journalists, activists, government critics and independent civic actors.

Freedom House's Freedom on the Net 2025 [report](#) found that internet freedom in Kyrgyzstan continued to decline during the reporting period. It linked this decline to detentions of journalists, activists and individuals critical of the government, as well as a broader crackdown on online media outlets. This supports the score because online political speech remains possible, but it carries clear legal and personal risks.

The authorities also restricted platforms and online content. In April 2024, most internet providers blocked TikTok after a decision linked to child-safety concerns and the State Committee for National Security. Freedom House [reported](#) that TikTok was inaccessible from all mobile internet service providers by May 2024, though it remained accessible on some fixed connections. This shows that platform blocking is selective rather than total.

The earlier case of blogger Yrys Zhekshenaliev remains an important precedent for online censorship with a significant cooling effect. He was arrested in 2022 after Facebook posts on environmental and mining issues at the Zhetim-Too deposit and charged with public calls for mass disorder and violence; prosecutors later sought a seven-year sentence. Although courts [acquitted](#) him in 2023–2024, the lengthy case showed that online posts or reposts on sensitive public issues can trigger serious criminal prosecution, reinforcing caution among activists, bloggers and CSOs.

The state also used extremism decisions against online media and civic information spaces. In October 2025, a court declared Temirov Live and Kloop Media extremist. The decision [banned](#) their operations, required their social media pages to be blocked and warned that people who distributed or republished their materials could face criminal prosecution. Reuters also [reported](#) that the ruling targeted three leading independent outlets and banned their websites shortly before the parliamentary election.

New media and internet laws increased state control. In June 2025, the parliament [approved](#) a bill requiring news websites to register with a state-authorised body and giving the state power to grant or revoke licences. Media experts warned that the law could be used to muzzle independent and critical outlets. In July 2025, [new rules](#) required internet providers to block websites based on decisions by the Ministry of Culture, with fines for violations.

The panel reported that these measures cause self-censorship. CSOs still use social media, websites and messaging platforms, but they avoid sensitive wording, reduce public commentary and move some discussions into closed groups. Organisations working on human rights, anti-corruption, media freedom, gender equality, elections and LGBTQIA+ issues face the strongest pressure.

Thus, the digital environment is not fully closed, and political opinions still appear online. But censorship, blocking, criminal-law risks and prosecutions are now frequent enough to discourage online expression and make the environment close to disabling for independent civic expression.

6.2 | Digital security and privacy

The panel scored digital security and privacy as disabling. CSOs have some legal protections around personal data, and the new Digital Code creates an updated data protection framework. But privacy and security risks remain high because the state has gained stronger control over internet infrastructure, online expression and data flows.

The biggest new risk is the now centralised control over international internet traffic: in July 2025, Reuters reported that President Japarov had signed a decree giving the state-owned company EICat a one-year monopoly over international internet traffic from 15 August 2025. Other telecom operators were required to transfer their international bandwidth contracts to EICat. Reuters also [reported](#) concerns that this decision increased the role of the state at the

expense of market freedom and civil liberties. This matters for digital security because centralised routing can increase the risks of surveillance, disruption and pressure on providers.

Data protection law has changed, but CSOs still face compliance challenges. ICNL's [guidance](#) on Kyrgyzstan's Digital Code notes that the code replaces the 2008 Law on Personal Information and creates a new framework that CSOs must comply with from February 2026. CSOs must understand and comply with [rules](#) on personal and sensitive data, lawful processing, valid consent, cross-border transfers, data security, data-subject rights. It also notes new administrative liability for violations. CSOs must now prepare for new consent, data processing and compliance obligations. While this gives CSOs a clearer legal framework than before, it also raises the compliance burden for smaller organisations that lack dedicated legal counsel, data protection staff or secure information technology (IT) infrastructure.

Online harassment and intimidation remain serious risks. Human Rights Watch [reported](#) in February 2025 that imprisoned journalist Makhabat Tazhibek Kyzy had allegedly faced harassment, intimidation and repeated death threats from a fellow prisoner after her conviction on incitement charges. While this case took place in detention, it reflects the wider pattern of intimidation against media and civic actors who work online and offline.

The panel found that many CSOs respond by changing their digital behaviour. They move sensitive communication to closed channels, avoid storing sensitive personal data online, reduce public posts and use encrypted messaging more often. These steps reduce some risk, but they also limit outreach, advocacy and trust-building with beneficiaries.

Smaller and regional CSOs face the greatest security gap. They often lack cybersecurity training, secure cloud storage, safe data management rules and funds for professional IT support. This is especially risky for organisations that work with survivors of violence, persons with disabilities, LGBTQIA+ people, people living with HIV, drug users, sex workers, migrants or whistle-blowers. A data leak or account compromise can expose beneficiaries to stigma or state pressure.

The score therefore reflects a weak, but not absent, protection environment. Data protection rules exist, and some CSOs have improved their practices. Yet state control over internet infrastructure, online intimidation, weak remedies and low CSO cybersecurity capacity threaten to make the environment disabling.

6.3 | Digital accessibility

Digital accessibility is the strongest dimension under Principle 6, with a score of 3. Internet access is relatively broad, and most CSOs can use basic online tools. Organisations in Bishkek, Osh and other urban centres use websites, social media, messaging apps, online meetings, cloud tools, digital fundraising platforms and online training.

National-level data supports this assessment: DataReportal's Digital 2026 [profile](#) reported 6.48 million internet users in Kyrgyzstan at the end of 2025, with internet penetration at 88.5%. The World Bank's [country data](#), based on International Telecommunication Union indicators, reported that 92% of the population used the internet in 2024. These figures show that the country does not face a general lack of internet access.

However, high national penetration does not mean equal access. Rural, mountainous and remote communities still face weaker connection quality, lower speeds, higher relative costs and fewer digital support services. These barriers matter because according to World Bank [data](#), around 62% of the population lives outside urban centres, and many community-based CSOs serve people with limited devices, digital literacy or trust in online communication. They also affect older people, persons with disabilities, rural women, low-income families and people who use minority languages.

Digital skills are another problem. Many CSOs can use basic tools, but fewer can produce accessible online content, properly use or maintain secure data systems, respect cybersecurity norms, plan digital campaigns, engage with online fundraising or use AI-based tools. Smaller CSOs often rely on one or two staff members with basic digital knowledge. If those staff leave, the organisation loses capacity. This limits digital adaptation and makes CSOs more dependent on donors, consultants or informal support.

Digital accessibility also includes accessibility for beneficiaries. Some CSOs cannot reach parts of their target groups online because those groups lack stable internet, devices, digital literacy, accessible formats or trust in online communication. This is especially important for persons with disabilities, older people, rural communities and people who fear stigma or surveillance.

Digital accessibility is thus partially enabling: while Kyrgyzstan has broad internet use, and CSOs can generally access and share content online, digital access is not yet equal, affordable and secure, and the country's population is not skilled enough to support a higher score. Digital accessibility remains partially enabling, while digital freedoms and digital security continue to deteriorate.

C) Recommendations

To the Government and Parliament of the Kyrgyz Republic

The Government and Parliament should review the Law of the Kyrgyz Republic No. 72 of 2 April 2024 “On Amendments to the Law of the Kyrgyz Republic ‘On Non-Commercial Organisations’” and Cabinet of Ministers Decree No. 518 of 27 August 2024. They should remove the stigmatising label of “foreign representative”, repeal the special restrictions and reporting obligations linked to broadly defined “political activity” by CSOs, and make sure that reporting, audit and inspection rules do not let public bodies interfere in the lawful work of CSOs.

The Ministry of Justice should apply registration rules in a clear and predictable way. It should not require CSOs to change names, statutes or activities because of informal political signals. It should publish clear guidance on registration, re-registration, beneficial ownership information and the status of CSOs that do not have owners or shareholders. It should also make sure that CSOs can appeal registration decisions in a way that is timely and effective.

The Government should stop using broad and repeated restrictions on peaceful assemblies in central Bishkek. Courts and local authorities should assess each planned assembly on its own facts and should allow peaceful protest unless the state can show a clear, lawful and proportionate reason for a restriction.

The Government and Parliament should review the Law on Mass Media, online blocking rules and laws on extremist materials to protect free expression and civic information work. The Ministry of Culture should not block websites or online platforms without a clear legal basis, independent review and a prompt appeal route. The authorities should also avoid using extremism and public-order laws against journalists, bloggers, civic information platforms and CSOs because of their critical reporting or public-interest work.

Public bodies should improve public consultation. They should give CSOs enough time to review draft laws and policies, especially when reforms affect civic space, media freedom, digital rights, equality, elections or public oversight. Ministries and Parliament should publish response matrices that show which CSO comments they accepted, which they rejected and why. The Government should also rebuild structured dialogue with civil society, including by taking steps to re-engage with open-government processes.

The Government should strengthen equality and inclusion in civic participation. It should ensure that women, persons with disabilities, rural communities, linguistic minorities, LGBTQIA+ persons and other marginalised groups can take part in public consultations directly and safely. Public bodies should provide accessible venues, plain-language

materials, online and offline participation options, sign language and other reasonable accommodation where needed.

The Government should protect digital rights and privacy. It should ensure that any control over international internet traffic remains time-bound, lawful, transparent and subject to independent oversight. It should also issue clear, practical guidance on the Digital Code for CSOs, with a focus on consent, sensitive data, cross-border data transfers and safe handling of beneficiary data. Data protection rules should protect people, not create a new tool for selective pressure on CSOs.

To donors and international partners

Donors should provide more multi-year and core funding to CSOs. Short project grants do not cover the costs that CSOs now face for audits, legal review, accounting, digital security, data protection, staff retention and risk management. Donors should give particular support to regional, grassroots and community-based CSOs that have fewer links to funding networks and less access to legal and audit services.

Donors should keep funding rights-based, watchdog and public-interest work, even when this work becomes more sensitive. They should not push CSOs away from advocacy, anti-corruption, human rights, gender equality, election monitoring, independent media or LGBTQIA+ work because of legal risk. Instead, they should help grantees to identify safe legal pathways for receiving and implementing grants, fund legal and compliance advice, adjust project design where needed and support safe public communication.

International partners should coordinate their support so that sudden funding cuts do not leave CSOs without options. They should also support emergency funds for legal aid, digital security, relocation, psychosocial support and rapid response when CSOs, journalists or activists face pressure.

Donors should reduce avoidable administrative burdens. They should use proportionate reporting rules, accept justified changes in activities and budgets, and support local audit, accounting and compliance capacity. This will help CSOs to spend more time on public-benefit work and less time managing donor and regulatory paperwork.

To civil society organisations

CSOs should continue to document how laws, inspections, registration practice, banking checks, public rhetoric and digital controls affect their work. They should record concrete cases, dates, responsible institutions and impacts on staff, beneficiaries and communities. This evidence can support advocacy, legal defence and future monitoring of the enabling environment.

CSOs should strengthen joint advocacy across sectors. Service-delivery CSOs, rights-based CSOs, independent media, women's organisations, disability organisations, youth groups and regional CSOs should work together when laws affect the whole sector. Wider coalitions can reduce the risk that the state isolates only the most critical or visible organisations.

CSOs should invest in internal risk management. They should review statutes, data protection practices, digital security, financial controls and staff safety plans, while avoiding unnecessary self-censorship that weakens their mission. Where possible, CSOs should seek legal advice before changing organisational goals, names or public language in response to informal pressure.

CSOs should make civic participation more inclusive. Larger CSOs and umbrella groups should create more space for smaller, rural and community-based organisations to speak directly with public bodies and donors. They should also support participation by women, persons with disabilities, LGBTQIA+ communities, linguistic minorities, young people and low-income groups.

To banks, audit firms, professional associations and private-sector actors

Banks should apply compliance and beneficial ownership checks to CSOs in a proportionate, risk-based way, taking into account the specific governance features of non-commercial organisations described under Principle 2. They should avoid blocking accounts or delaying transactions without clear grounds and should provide written explanations when they request additional documents.

Banking, audit and professional associations should work with regulators, CSO networks and donors to define good practice for CSO clients. This guidance should explain how to assess CSO governance and control structures, foreign grant documentation, risk-based checks and escalation procedures without applying business ownership models mechanically. Joint guidance can help individual banks to comply with legal duties without over-restricting CSO accounts.

Audit firms and professional associations should expand affordable services for CSOs, especially outside Bishkek and Osh. Donors and CSO networks can help to build a pool of auditors, accountants and legal advisers who understand non-commercial organisations and the new compliance risk they face.

To independent media and civic information actors

Independent media and civic information platforms should keep working with CSOs to explain how civic space restrictions affect ordinary people, local services, rights and public accountability. They should use clear, fact-based language and protect sources, staff and partners from avoidable digital and legal risks.

Media support organisations and CSOs should also invest in digital safety, secure communication, data protection and responsible public-interest reporting. This will help to protect journalists, activists, sources and communities in a more restrictive online environment.

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 April and May 2026.** 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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