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CSO METER

Empowered for Action

2024 Regional Report

The Hague





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European Center for
Not-for-Profit Law

CSO Meter 2024 Regional Report

European Center for Not-for-Profit Law Stichting (ECNL) has prepared this Regional Report based on the findings and priorities of the six CSO Meter Country Reports for 2024 from its six partners: Transparency International Anticorruption Center in Armenia; Civil Society Institute in Georgia; Promo-LEX Association in Moldova; ISAR Ednannia in Ukraine; country researchers from Belarus and Azerbaijan; and the support of the following Hub members: NGO Center, Law Development and Protection Foundation, and Eurasia Partnership Foundation from Armenia; the Georgian Young Lawyers' Association (GYLA) and the Institute for Development of Freedom of Information (IDFI) in Georgia, the Independent Journalism Center (IJC) and the Legal Resources Centre from Moldova (LRCM); the Ukrainian Center for Independent Political Research (UCIPR), the Centre for Democracy and Rule of Law, ZMINA Human Rights Centre and the Institute of Legislative Ideas in Ukraine.

ECNL is a leading European resource and research centre in the field of policies and laws affecting civil society. ECNL creates knowledge, empowers partners and helps set standards that create, protect, and expand civic freedoms.

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CONTENTS

ABBREVIATIONS & ACRONYMS5

I. EXECUTIVE SUMMARY: CIVIL SOCIETY ENVIRONMENT IN THE EASTERN PARTNERSHIP REGION 6

CIVIL SOCIETY AS AN ESSENTIAL PILLAR FOR STABILITY AND DEMOCRACY IN THE EAP REGION ..	6
KEY TRENDS.....	10
ASSESSING THE CIVIL SOCIETY ENVIRONMENT IN THE EAP REGION: SCORES AND INSIGHTS	13

II. KEY FINDINGS 17

AREA 1: FREEDOM OF ASSOCIATION.....	17
AREA 2: EQUAL TREATMENT.....	19
AREA 3: ACCESS TO FUNDING	22
AREA 4: FREEDOM OF PEACEFUL ASSEMBLY.....	24
AREA 5: RIGHT TO PARTICIPATION IN DECISION-MAKING	26
AREA 6: FREEDOM OF EXPRESSION	28
AREA 7: RIGHT TO PRIVACY	30
AREA 8: STATE DUTY TO PROTECT	31
AREA 9: STATE SUPPORT	34
AREA 10: STATE–CSO COOPERATION.....	37
AREA 11: DIGITAL RIGHTS.....	38

III. KEY PRIORITIES 41

IV. BIBLIOGRAPHY 43

ANNEX 1. REGIONAL SCORES 2024 48

ABBREVIATIONS & ACRONYMS

AI	Artificial intelligence
AML/CTF	Anti-money laundering and counter-terrorism financing
COP29	2024 United Nations Climate Change Conference
CSO	Civil society organisation
DoD	European Union Directive on Transparency of Interest Representation on Behalf of Third Countries
EaP	Eastern Partnership
ECNL	European Center for Not-for-Profit Law Stichting
EU	European Union
GDPR	General Data Protection Regulation (Regulation (EU) 2016/679)
LGBTQ+	Lesbian, gay, bisexual, transgender, queer/questioning, intersex, asexual, etc.
MONEYVAL	The Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
NGO	Non-governmental organisation
OGP	Open Government Partnership
SLAPP	Strategic litigation against public participation
UBO	Ultimate beneficial owner
USAID	United States Agency for International Development

I. Executive summary: Civil society environment in the Eastern Partnership region

The CSO Meter 2024 Regional Report draws on the six CSO Meter 2024 Country Reports based on continuous monitoring and broader analysis of the civil society environment in the Eastern Partnership (EaP) region. It highlights key trends both within and outside the region, including recent developments such as the United States (US) funding freeze and the reduction in bilateral support which has had a significant impact on civil society in the region. The Report also covers key developments and changes in scores across the eleven thematic areas of the CSO Meter. The Report concludes with a set of strategic priorities which aim to guide states, European Union (EU) institutions, civil society organisations (CSOs) and donors in navigating their work on improving the civil society environment in the region. These priorities are intended to inform the EU's assessment of progress toward integration of Ukraine, Moldova and Georgia and shape its rule of law reporting. They also serve as essential guidance for the EU and other donors in setting funding priorities and planning political and financial support for civil society.

Civil society as an essential pillar for stability and democracy in the EaP region

In 2024, the EaP region faced instability due to war, conflict, floods, polarisation, and election interference, while civil society came under further legal restrictions. Yet despite these challenges, civil society remained crucial in advancing democratic reforms, particularly by advocating for legislation that enhances public participation, data protection, and transparency. Additionally, it has supported national stability through anti-disinformation initiatives, delivering services to vulnerable populations, and fostering dialogue. In restrictive environments, CSOs have been instrumental in protecting people's fundamental rights, from resisting surveillance and defending the

right to exercise their freedom of assembly, to demanding accountability for violations and advocating for greater access to funding.

On the one hand, Georgia, Azerbaijan, and Belarus have intensified their existing trajectories to restrict civil society and to suppress democratic voices and initiatives, implementing measures that stifle human rights activism. On the other hand, Ukraine, Moldova and Armenia have remained committed to their EU integration paths and have ensured generally positive engagement with civil society.

As the region continues to face security challenges, it will be ever more important to empower CSOs as pillars of stability and democracy.

Civil society affected by conflict and crises

In Ukraine, despite the severe challenges posed by the Russian Federation's armed aggression which has continued throughout 2024, civil society has shown remarkable resilience and adaptability. Organisations have continued their work – even following their displacement from areas that are temporarily occupied or where hostilities have been taking place. CSOs have persisted in their work despite daily threats to the lives and health of their employees, as well as shortages of qualified staff, with many people having been killed, displaced, or serving in the military. Civil society continues to help displaced people from Ukraine, as well as to actively counter disinformation and foreign interference through various programmes focused on debunking and media literacy. The armed aggression against Ukraine also continues to affect Moldova. Several Russian-launched drones have landed in the territory of the Republic of Moldova in 2024, threatening the safety of the population¹.

Relations between Armenia and Azerbaijan in 2024 were marked by progress in the negotiations on the delimitation of the border². Armenian CSOs continue to provide aid to displaced families from the Nagorno-Karabakh region and to advocate for their rights at the international level. Many organisations from the Nagorno-Karabakh region have re-registered in Armenia where they are continuing their activities. During heavy floods in May 2024, Armenian CSOs also provided crucial emergency relief to affected populations³.

Deepening of relations between the EaP region and the EU

¹ Police of the Republic of Moldova, Facebook posts (in Romanian): Etulia (Vulcanesti), 11 February 2024 (in Romanian), <https://www.facebook.com/share/p/xuYeCsNXmEFa1GDz/> ; Fîrladeni (Causeni) si Borosenii Noi (Rîscani), 10 November 2024 (in Romanian), <https://www.facebook.com/share/p/bBDjGMsHXDJV79va/> ; Port Mall/Arena Chisinau, 19 November 2024, <https://www.facebook.com/share/p/dExwS37Ktr4GsaZ/> .

² European External Action Service (EEAS), Armenia/Azerbaijan: Statement by the High Representative/Vice-President regarding the finalisation of negotiations on Armenia/Azerbaijan Peace Treaty, March 2024. [Armenia/Azerbaijan: Statement by the High Representative/Vice-President regarding the finalisation of negotiations on Armenia/Azerbaijan Peace Treaty | EEAS](#)

³ Euronews, Northern Armenia assess aftermath of worst flooding in decades, May 2024. <https://www.euronews.com/2024/05/28/northern-armenia-assess-aftermath-of-worse-flooding-in-decades>

In June 2024, the EU officially opened accession negotiations with Moldova⁴ and Ukraine⁵, while, due to negative developments and serious democratic backsliding, it halted this process for Georgia⁶. CSOs have been crucial in supporting democratic reforms and, in the case of Georgia, in supporting protesters who disagreed with the government's reversal on EU accession.

While polls indicate overwhelming support for EU integration among the Georgian population,⁷ shortly after the parliamentary elections in October 2024, the ruling Georgian Dream party announced that it would not place EU accession negotiations on the agenda until 2028, citing alleged 'blackmail and manipulation' by EU officials⁸. This triggered widespread protests across Georgia which are still ongoing⁹, advocating for the resumption of EU accession negotiations and the scheduling of new parliamentary elections. Based on the monitoring done by Georgian CSO Meter partners, the government attempted to suppress the protests with brutal police force, arbitrary detentions, torture, and inhumane treatment of protesters. As protests continued, the government retaliated with legislative restrictions, introducing numerous amendments that infringe on the fundamental right to peaceful assembly and association. While various EU institutions have condemned the developments, more sustained international pressure is needed.

In Moldova, the EU accession procedure has encouraged reforms, as evidenced by Moldova's swift alignment with EU legislation in several areas. 2024 was marked by a constitutional referendum on EU accession, which passed by a narrow margin and resulted in the inclusion of EU integration as a strategic objective in the Moldovan Constitution¹⁰. The referendum, along with the presidential elections held simultaneously, were heavily affected by foreign interference and active disinformation against EU integration. This manipulation, which included pro-Russian content, was amplified during the referendum and was also characterised by illegal

⁴ European Commission, Directorate-General for Neighbourhood and Enlargement Negotiations, EU opens accession negotiations with Moldova, June 2024. [EU opens accession negotiations with Moldova - European Commission](#)

⁵ European Commission, Directorate-General for Neighbourhood and Enlargement Negotiations, EU opens accession negotiations with Ukraine, June 2024. [EU opens accession negotiations with Ukraine - European Commission](#)

⁶ European Commission, Directorate-General for Neighbourhood and Enlargement Negotiations, Commission proposes to suspend visa-free travel for officials from Georgia, December 2024. [Commission proposes to suspend visa-free travel for officials from Georgia - European Commission](#)

⁷ EU NEIGHBOURS east, Georgia Annual Survey 2024 – Country Report, November 2024. [Georgia annual survey 2024 – country report - EU NEIGHBOURS east](#).

⁸ France 24, Georgia delays EU bid until 2028 amid post-election crisis, November 2024. [Georgia postpones EU bid until 2028, accusing Brussels of 'blackmail'](#)

⁹ CSO Meter, Georgia: Protests continue, marked by violence, arrests and intimidation, December 2024. [Georgia: Protests continue, marked by violence, arrests and intimidation | CSOMETER](#)

¹⁰ Europa pentru tine, 'Europe for you' (in Romanian), <https://moldovaeuropeana.md/>.

activities such as electoral corruption, unlawful financing, and paid protests¹¹. The schemes targeted hundreds of thousands of people in an attempt to influence the electoral process.

The advancement of Ukraine's EU accession negotiations has led to significant support for CSOs and possibilities for their involvement in the decision-making process. The government has announced that it will involve CSOs in national consultations on the process of Ukraine's EU membership.

Election periods exacerbating restrictions on fundamental freedoms

In 2024, elections took place in Azerbaijan, Belarus, Georgia and Moldova. In all of these countries, apart from in Moldova, the election campaigns contributed to increased pressure on civil society actors.

In the run-up to the parliamentary election in Georgia, the government adopted legislation restricting fundamental rights, including the Law on Transparency of Foreign Influence (sometimes referred to as the 'foreign agents law')¹² and the Law on Family Values and the Protection of Minors¹³. The parliamentary election, in which the ruling Georgian Dream party was declared the winner, was widely criticised for manipulation and voter intimidation¹⁴. This triggered a wave of protests, which are continuing at the time of this Report. Civil society has played a crucial role in addressing the unlawful actions taken against protesters. For instance, CSOs have provided legal aid to those arbitrarily detained, documented violations and assaults, and crowdfunded support for those fined for demonstrating.

Azerbaijan held two elections in 2024: a presidential election in February and a parliamentary election in September¹⁵. Both periods were marked by increased pressure, attacks on international organisations, smear campaigns against activists and arrests of journalists.

¹¹ Police of the Republic of Moldova (in Romanian): 'Tens of searches in a case of illegal financing of political parties and money laundering', 3 June 2024, <https://politia.md/ro/content/zeci-de-perchezitii-intr-un-dosar-de-finantare-ilegala-partidelor-politice-si-spalare-de-0>; 'Searches within a criminal case regarding the illegal financing of political parties, initiative groups and electoral competitors', 16 August 2024, <https://politia.md/ro/content/perchezitii-cadrul-unei-cauze-penale-privind-finantarea-ilegala-partidelor-politice>.

¹² Law of Georgia on Transparency of Foreign Influence, No. 4194-XIV⁰-X⁰, 28/05/2024, <https://www.matsne.gov.ge/en/document/view/6171895?publication=0>

¹³ Law of Georgia on Family Values and the Protection of Minors, No. 4437-XVI⁰-X⁰, 17/09/2024, <https://matsne.gov.ge/en/document/view/6283110?publication=0>.

¹⁴ OSCE Office for Democratic Institutions and Human Rights (ODIHR), Georgia Parliamentary Elections 26 October 2024: ODIHR Election Observation Mission Final Report, October 2024. [584029_0.pdf](#)

¹⁵ OSCE Office for Democratic Institutions and Human Rights (ODIHR), Early parliamentary elections, 1 September 2024: Election Observation Mission Final Report, September 2024. [Early parliamentary elections, 1 September 2024 | OSCE](#)

Belarus held parliamentary elections in February 2024¹⁶ and presidential elections in January 2025¹⁷. Both pre-election periods were marked by two waves of arrests and searches targeting civil society activists¹⁸. The level of repression remained high throughout 2024, with hundreds of arrests, searches, and dozens of prison sentences each month. Restrictions also extended to new areas, affecting teachers, minorities, families of political prisoners, donors to solidarity funds, and subscribers to banned media channels. Government control tightened with new legislation introducing excessive licensing requirements in tourism and social services, as well as further criminalising civil society and foreign aid recipients, who were abusively labelled as 'extremists'.

In the presidential election in Moldova, incumbent Maia Sandu won a second presidential mandate following the second round of voting on 3 November 2024. Despite the more progressive outlook in the country, certain political figures have expressed direct hostility toward CSOs in their electoral platforms. Additionally, as reported by country partners, during election-related assemblies, there were instances where police resorted to disproportionate measures—restricting access to public spaces, intervening in the conduct of assemblies, or dispersing them.

Key trends

The following key trends were identified:

1. Rising repression: Civil society faces increased criminalisation and violence amid declining human rights

Civil society in Georgia, Azerbaijan and Belarus has been severely impacted with over 331 individuals being detained for political reasons in Azerbaijan¹⁹ and according to human rights defenders, at least 1,317 individuals being detained in Belarus by the end of 2024. The governments continued targeting opposition groups, activists, and critical media. Freedom of assembly and expression is particularly under threat. In Azerbaijan, despite laws permitting peaceful gatherings, organisers face arbitrary denials and harsh penalties. Similarly, in Belarus, violent crackdowns on protests resulted in criminalization of dissent, creating widespread fear. In Georgia, the government's

¹⁶ International Institute for Democracy and Electoral Assistance (International IDEA), Belarus – February 2024, February 2024. [Belarus - February 2024 | The Global State of Democracy](#)

¹⁷ UK Government, 2025 Presidential Elections in Belarus: Joint Statement to the OSCE, January 2025. [2025 Presidential Elections in Belarus: joint statement to the OSCE - GOV.UK](#)

¹⁸ CSO Meter, Belarus: Ahead of the January 26 presidential election, criminal charges against any opposition still used to suppress civic activity <https://csometer.info/updates/belarus-ahead-january-26-presidential-election-criminal-charges-against-any-opposition>

¹⁹ International Partnership for Human Rights (IPHR) and Campaign to End Repression in Azerbaijan, Azerbaijan's Defiance: A Decade of Contempt for the Council of Europe, December 2024. [Report: Azerbaijan's Defiance: A Decade of Contempt for the Council of Europe | Anar Mammadli Campaign to end repression in Azerbaijan](#).

violent response to protests against new restrictive laws and election results and the pausing of the EU integration process led to unprecedented police violence and arrests. This repression, along with disinformation, has stifled activism and deepened authoritarianism across the region. In Belarus and Azerbaijan, the number of CSOs and activists in exile has significantly increased over the years and it is expected that this trend will also be seen in Georgia.

2. Power play: Silencing CSOs through lobbying and foreign funding restrictions

Recent legislative developments, such as ‘foreign agents’ laws, impose heavy compliance burdens and penalties, primarily targeting the democracy and human rights CSOs. In 2024, Georgia adopted the Law on Transparency of Foreign Influence, signalling a closing and restrictive space for civil society, and growing violations of freedoms and human rights. Additionally, lobbying laws pose significant challenges to civil society’s advocacy efforts and its involvement in policymaking, impacting initiatives, laws, and strategies critical to societal progress. In Ukraine, a new Law on Lobbying was adopted in 2024 which fails to distinguish between commercial lobbying activities and genuine citizen participation raising concerns among civil society that it could undermine advocacy for policy change²⁰. In parallel to these developments, the EU proposed Directive on Transparency of Interest Representation on Behalf of Third Countries (DOD)²¹, which has been flagged by ECNL²² and partners as problematic due to vague definitions and disproportionate obligations on civil society. While aimed at addressing covert foreign influence, the DOD has already been cited by the Georgian Dream in Georgia²³ in the region to justify adoption of restrictive measures against civil society.

3. Security under threat: Civil society and vulnerable groups face increasing stigmatisation, marginalisation and surveillance

Across the EaP region, there is a growing trend of using legal pressure, harassment, and stigmatising narratives to suppress activism and marginalise vulnerable communities and especially work of organisations focusing on justice and inclusion. LGBTQ+

²⁰ CSO Meter, Ukraine: New Law on Lobbying Could Restrict CSOs’ Advocacy Activities, March 2025. [Ukraine: New Law on Lobbying could restrict CSOs’ advocacy activities | CSOMETER](#)

²¹ European Commission, Proposal for a Directive of the European Parliament and of the Council establishing harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries and amending Directive (EU) 2019/1937, December 2023. [EUR-Lex - 52023PC0637 - EN - EUR-Lex](#).

²² European Center for Not-for-Profit Law (ECNL), EU Defence of Democracy Package: Proposal for Directive lacks clarity and legal certainty on key definitions, April 2024. <https://ecnl.org/publications/eu-defence-democracy-package-proposal-directive-lacks-clarity-and-legal-certainty-key>

communities across the region face intensifying legal and societal attacks. Legislative developments concerning anti-LGBTQ+ laws follow a broader trend in which legislation restricting foreign funding to civil society is often followed by anti-LGBTQ+ laws (as seen in [Russia](#), [Hungary](#), [Slovakia](#) and [Bulgaria](#)). In 2024, in Georgia, the Parliament passed the Law on Family Values and the Protection of Minors, which restricts LGBTQ+ rights through bans on same-sex marriage, LGBTQ+ content, gender reassignment procedures, and LGBTQ+ assemblies. Hate speech targeting LGBTQ+ individuals remains widespread in Belarus and Georgia, often amplified by state-aligned media. In Belarus, law enforcement authorities have carried out forced outings of LGBTQ+ persons as part of ongoing political repression. While in Moldova, the authorities provided security for LGBTQ+ Pride events, in Armenia, debates on anti-discrimination laws in the National Assembly excluded specific protections for sexual orientation and gender identity.

In parallel, environmental groups are also under increased attack. Strategic litigation against public participation (SLAPPs), harassment, and smear campaigns continue to target environmental activists, such as those opposing Armenia's Amulsar gold mining project, with little protection offered by law enforcement. In Moldova, 70 per cent of media-related cases brought before the Supreme Court between 2019 and 2023 were likely SLAPPs, with an even greater number in the lower courts, aimed at silencing critical voices. These developments reinforce government control over civil society, making it exceedingly difficult for CSOs to operate independently and to effectively advocate for human rights and democratic governance.

4. Survival of civil society at risk: Funding access narrows amid shifting development infrastructure, growing international scrutiny and isolation

The survival of CSOs across the EaP countries is increasingly jeopardised by significant challenges in accessing funding for various reasons, including recent freezes from major international donors, including the intended dismantling of the United States Agency for International Development (USAID)²⁴. The situation is particularly alarming in Belarus, where restrictions on both domestic and international funding, coupled with government scrutiny and the risk of legal repercussions for their activities, have led to the closure or exiled work of numerous organisations. Azerbaijan faces similar challenges, with rigorous registration requirements for foreign funding that create substantial barriers to financial support, and similar barriers are expected

²⁴ CSO Meter, Civil society in the Eastern Partnership is Europe's strategic partner: This is how funders can support it, December 2024. [Civil society in the Eastern Partnership is Europe's strategic partner: This is how funders can support it | CSOMETER](#)

to emerge in Georgia. The U.S. funding freezes, the dismantling of USAID, and Georgia's paused EU accession process exacerbates these difficulties, leading to immediate consequences such as project and activity cancellations. Even in countries with supportive laws, as Armenia and Moldova, many organisations find it challenging to pivot toward alternative sources of funding, as the infrastructure to develop and use them needs further investment. This difficulty arises from several societal factors as well, including the long-term programming commitments of donors, the absence of flexibility in redirecting funds to meet emergent priorities, the lack of local donors and supporters, mistrust, limited cooperation with businesses, and underdeveloped public funding systems.

The reports by multi-lateral bodies of serious violations of human rights practices resulted in diplomatic strains on the relationships with Belarus, Azerbaijan, and Georgia. Namely, the Parliamentary Assembly of the Council of Europe declined to ratify the credentials of Azerbaijan's parliamentary delegation, drawing attention to serious concerns regarding human rights violations in the country. Since then, the authorities have refused to cooperate with the institutions and monitoring mechanisms of the Council of Europe. Belarus is facing significant diplomatic and economic sanctions imposed by Western countries and organisations, including the U.S. and the EU, predominantly in relation to the Belarusian government's involvement in Russia's aggression against Ukraine. Additionally, Georgia's paused dialogue with the EU has raised alarms about the future trajectory of the country.

Assessing the civil society environment in the EaP region: Scores and Insights

CSO Meter	Overall		Law		Practice	
Country	2024	2023	2024	2023	2024	2023
Armenia	4.8	4.8	5.2	5.2	4.3	4.3
Azerbaijan	3.7	4.0	4.2	4.4	3.2	3.6
Belarus	2.2	2.2	2.7	2.7	1.6	1.7
Georgia	4.0	4.8	4.3	5.2	3.7	4.3
Moldova	4.8	4.8	5.1	5.1	4.4	4.4
Ukraine	4.7	4.7	5.1	5.1	4.3	4.3
AVERAGE	4.0	4.2	4.4	4.6	3.6	3.8

Table 1: Comparative 2024 versus 2023 CSO Meter scores.

The regional civil society environment score is at the lowest in 2024 since the first assessment under the CSO Meter in 2021. The overall regional civil society environment score deteriorated from 4.2 in 2023 to 4.0 in 2024. The average score across all six countries for Legislation has fallen from 4.6 in 2023 to 4.4 in 2024 and the average score for Practice from 3.8 in 2023 to 3.6 in 2024.

Georgia experienced the most significant deterioration in the overall civil society environment – from a score of 4.8 in 2023 to 4.0 in 2024. This sharp decline was marked by the adoption of the Law on Transparency of Foreign Influence and the Law on Family Values and the Protection of Minors, both of which stigmatise CSOs and severely restrict LGBTQ+ rights. Peaceful protests against these laws were met with violence, arrests, and repression. Simultaneously, state-CSO cooperation collapsed, with the government halting the Open Government Partnership (OGP) Action Plan and excluding CSOs from public processes. This democratic backsliding prompted the EU to freeze Georgia's accession talks and the U.S. to suspend major financial aid, threatening the stability of CSO funding. Combined with attacks on journalists, legal crackdowns on free expression, and an unstable, non-transparent legislative process, these developments have deeply undermined civil society and democratic governance in Georgia.

Azerbaijan also saw a notable deterioration in its overall score – from 4.0 in 2023 to 3.7 in 2024. This is due to the escalation in pressure against civil society, with a record 331 political prisoners and increased targeting of journalists, activists, and CSOs, particularly around the time of the COP29 climate change conference held in Baku in November 2024²⁵. In previous years, the government has adopted restrictive laws, imposed burdensome reporting and tax obligations on CSOs, and limited their access to funding, while smear campaigns and surveillance have further undermined civil society. Free association, access to funding, peaceful assembly and free expression remain severely restricted and dissenting voices have been excluded from electoral and decision-making processes.

Belarus' average score for Practice deteriorated from 1.7 in 2023 to 1.6 in 2024. While independent CSOs continue to operate covertly, their activities are severely restricted, with some sectors such as non-state trade unions and human rights movements relegated to the illegal sphere. The first sentence under Article 193-1 of the Criminal Code for continuing illegal activities of a dissolved organisation occurred in 2024, highlighting the ongoing repression. A new version of Edict No. 300 has allowed for

²⁵ International Federation for Human Rights (FIDH), Azerbaijan: Civil society demands attention to human rights and climate justice ahead of COP29, November 2024. <https://www.fidh.org/en/region/europe-central-asia/azerbaijan/azerbaijan-civil-society-demands-attention-to-human-rights-and>

some legal domestic funding for CSOs, but access to this funding remains politically controlled. The government has intensified prosecution of individuals and CSOs receiving foreign aid, often accusing them of extremist activities. State-controlled CSOs have been active in political campaigns, but due to the lack of political pluralism and manipulated elections, their participation remains limited. Additionally, the compulsory re-registration of religious organisations, which began in July 2024, is part of a broader crackdown on civil society.

In 2024, all six countries have recorded changes in their scores across various areas. The only country to report only improvements in score (and no deteriorations) was Ukraine, namely in the Legislation dimension of Area 5 (*Right to Participation in Decision-Making*), which increased from 5.1 in 2023 to 5.2 in 2024. In Ukraine, new laws on public consultations and local self-government were passed, aiming to enhance civic participation. The government continued work on a new Action Plan for implementing the National Strategy for Promoting Civil Society Development and collaborated with CSOs to develop a volunteer support programme for 2025–2030. Georgia and Azerbaijan saw only declines in score across all 11 assessed areas. In contrast, Armenia and Moldova experienced both positive and negative developments across different areas. Moldova noted the highest number of positive changes in score – across four different areas.

In 2024, Armenia experienced large-scale protests which were mostly peaceful, yet police responses were at times violent, including the use of stun grenades with no accountability. Controversial draft legislation on police surveillance drew criticism from civil society, prompting the government to retract some of the proposals and to express readiness for further dialogue. A new Draft Law on Public Information was introduced and, although it was largely discussed with CSOs, some organisations raised concerns over potential rights violations contained in the Draft Law. CSOs expect that the latest legislative amendments covering policing of assemblies will contribute to the improvement of the rights of assembly participants. However, the use of SLAPPs and the levels of online hate against activists, especially environmental defenders, have intensified. Meanwhile, efforts to combat disinformation have progressed, participatory budgeting has been expanded to more communities, and a draft anti-discrimination law was discussed, although key protections remain excluded from it.

In Moldova, the Law on Access to Information of Public Interest, new participation platforms and a new CSO Development Programme were adopted, all of which aim to enhance state–CSO cooperation. Local-level transparency has also improved. Conditions for the exercise of freedom of peaceful assembly have improved with the end of the state of emergency. However, concerns remained over law enforcement interference in peaceful assemblies during the electoral period. In the area of digital

rights, specifically artificial intelligence (AI), progress included the establishment of the Sub-Council on AI and Data Governance with the involvement of CSOs, the publication of a White Paper on this topic, and Moldova's signing of the Council of Europe AI Framework Convention.

Armenia and Moldova continue to lead the region in terms of overall scores, while Belarus retains the lowest overall score, despite noting an improvement in one area (*Access to Funding*). Armenia holds the highest average score in the region in the Legislation dimension (5.2), while Moldova leads in the Practice dimension (4.4). Armenia has the highest scores by area across both dimensions. In Legislation, Armenia obtained a score of 5.8 in three areas – Freedom of Association, Access to Funding and Right to Privacy – and, in Practice, a score of 5.6 for Freedom of Association. Of all the countries in the region, Belarus maintains the lowest scores in both dimensions. For Legislation, it has an average score of 2.7 (the same as in 2023) and, for Practice, an average score of 1.6 (a deterioration from 1.7 in 2023).

Freedom of Association and Access to Funding both deteriorated in Georgia, Belarus and Azerbaijan, while Right to Participation in Decision-Making improved in Moldova and Ukraine. The only deteriorations noted in Armenia and Moldova were related to the practice of Freedom of Peaceful Assembly. In Moldova, alongside the improvement in the Right to Participation in Decision-Making, scores also increased in the areas of State-CSO Cooperation and Digital Rights. Area 4 (*Freedom of Peaceful Assembly*) experienced the most significant decline in average score across countries, dropping from 4.4 in 2023 to 3.9 in 2024. In the Legislation dimension, two areas also saw notable deteriorations: Area 2 (*Equal Treatment*) and Area 3 (*Access to Funding*), both decreasing from 4.7 to 4.4. In the Practice dimension, Area 3 (*Access to Funding*) fell from 4.0 to 3.7, while Area 10 (*State-CSO Cooperation*) deteriorated from 3.7 to 3.4. The most significant discrepancies between the Law and Practice dimensions are observed in two areas: Area 5 (*Right to Participation in Decision-Making*) and Area 6 (*Freedom of Expression*). These gaps highlight the contrast between the existence of legal frameworks and their actual implementation in practice.

II. Key findings

Area 1: Freedom of Association

	Overall		Law		Practice	
Area 1	2024	2023	2024	2023	2024	2023
Armenia	5.7	5.7	5.8	5.8	5.6	5.6
Azerbaijan	3.7	4.0	4.3	4.5	3.0	3.4
Belarus	2.3	2.3	2.8	2.8	1.7	1.8
Georgia	5.4	6.1	5.2	6.1	5.5	6.0
Moldova	5.5	5.5	5.6	5.6	5.3	5.3
Ukraine	5.6	5.6	5.6	5.6	5.5	5.5
AVERAGE	4.7	4.9	4.9	5.1	4.4	4.6

Table I: Comparative 2024 versus 2023 CSO Meter scores for Area 1 (*Freedom of Association*).

The average overall score in the area of **Freedom of Association** deteriorated from 4.9 in 2023 to 4.7 in 2024. However, it remains the highest-scoring area, with countries continuing to uphold it more consistently in both law and practice than other assessed areas. A significant contributor to this decline was the deterioration in Georgia's score (from 6.1 in 2023 to 5.4 in 2024) which resulted from the enactment of restrictive legislation (the Law on the Transparency of Foreign Influence and the Law on Family Values and the Protection of Minors) that is anticipated to severely curtail freedom of association through provisions that allow state interference in CSO operations, impose increased reporting burdens, and disproportionate sanctions. As a result, Armenia achieved the highest score (5.7) in this area in 2024, followed by Ukraine (5.6) and Moldova (5.5), consistent with previous years' assessments. These countries allow for everyone to freely form, join, and engage in CSOs, alongside operational autonomy and easy and inexpensive registration processes. Belarus (2.3) and Azerbaijan (3.7), which have the lowest scores in this area (representing further deteriorations versus 2023), are failing to meet international standards for freedom of association and demonstrating severe restrictions. These include obstacles to registration, the criminalisation of unregistered work, forced CSO termination processes in Belarus, and the active government targeting and suppression of CSOs perceived as critical or oppositional.

Growing legal constraints and practical violations on freedom of association

Georgia saw a sharp decline in freedom of association in 2024, marking a steep reversal from all previous reporting years in which it had the highest assessed level in this area. While a generally favourable legislative framework exists in Georgia, the Law on Transparency of Foreign Influence adopted in 2024 has significantly increased the potential for government overreach and the suppression of critical voices. This Law, along with the adoption of the Law on Family Values and the Protection of Minors in September 2024, creates a notably more restrictive environment for certain CSOs, demonstrating a concerning shift away from the principles of freedom of association.

In the other countries, except for in Belarus, freedom of association is, in general, guaranteed through national legal frameworks and is upheld in practice. Azerbaijan continues to show a discrepancy between legal guarantees and practice in this area. While the Azerbaijani constitution nominally protects freedom of association, for over a decade significant barriers exist, particularly for foreign nationals seeking to establish CSOs or those wishing to operate unregistered CSOs. The requirement of permanent residency for founders and legal representatives effectively limits the involvement of international organisations, hindering the development of a strong and diverse civil society. Additionally, conducting activities in the absence of an officially registered CSO may result in administrative or criminal liability. Belarus continues to suppress freedom of association, with systematic government repression leading to the forced closure of numerous CSOs and severe limitations on foreign participation, effectively nullifying the legal guarantees enshrined in its constitution.

Beneficial ownership rules continue to hinder CSO registration

The registration processes for CSOs vary significantly across the EaP region. Armenia offers a relatively straightforward and inexpensive process, although the lack of online registration and the closure of regional offices create logistical difficulties, particularly for CSOs in remote areas. Moldova's process is also relatively accessible, although additional requirements, such as systemic rearrangements of the registration section (combining register) and compulsory declarations on the CSO's ultimate beneficial owner (UBO), impose administrative burdens and slow down the procedure. Anti-money laundering and counter-terrorism financing (AML/CTF) regulations are also impacting freedom of association in countries in the region such as Armenia, Ukraine and Belarus. Requirements for a CSO to declare its UBOs create administrative burdens and a lack of clarity, including the requirement for additional documents and fees in Moldova and Armenia. Ukraine's registration system is generally efficient and inexpensive, but the lack of access to it through the online 'Diia' portal and the disruptions caused by the war present obstacles. Discussions on the issue of UBOs among Ukrainian civil society and relevant institutions continued throughout 2024, highlighting the need to expand the options available for registration of an entity's ownership structure and to define a list of CSOs that are not obligated to determine and disclose their UBOs. In Azerbaijan, the registration process is characterised by lengthy delays, arbitrary rejections, and informal demands for support letters from state bodies. The European Court of Human Rights has repeatedly condemned Azerbaijan's registration practices for CSOs. Belarus's registration process is largely irrelevant due to the government's systematic suppression of CSOs. The extensive requirements and lack of independence in the judiciary make successful registration highly improbable

for independent organisations and many initiatives do not even attempt to obtain legal status, preferring to undertake low profile operations, out of the public eye.

Expansion of state interference, restrictions and oversight

The freedom of CSOs to determine their objectives and activities is significantly constrained by law in Georgia and Belarus. While Armenia, Moldova, and Ukraine generally allow CSOs to choose their activities, the ongoing war in Ukraine has introduced new challenges. In 2024, Ukrainian members of the Parliament, proposed two draft laws to regulate ‘special missions’ and foreign representation trips, including provisions that raised concerns among CSOs about potential indirect pressure and criminal liability for activities such as attending events. Following public pressure, the draft laws were withdrawn. For over a decade, Azerbaijan imposes significant restrictions through lengthy registration processes, informal pressure, and limitations on international collaboration, particularly for CSOs working on sensitive topics. Belarus demonstrates the most severe violations and limitations, using a variety of methods, including labelling organisations as ‘extremist,’ conducting searches and seizures, and blocking CSOs’ bank accounts. Georgia’s Law on Transparency of Foreign Influence raises serious concerns about state interference, as it allows for broad oversight powers, vague criteria, and stigmatisation of those receiving foreign funding. Alongside this, the Law on Family Values and the Protection of Minors imposes restrictive measures targeting LGBTQ+ issues and actions. Sanctions against CSOs in the region pose challenges – from disproportionately high fines in Azerbaijan, to arbitrary closures and criminal prosecution in Belarus, with Moldova allowing forced liquidation for administrative non-compliance.

Area 2: Equal Treatment

	Overall		Law		Practice	
Area 2	2024	2023	2024	2023	2024	2023
Armenia	4.9	4.9	5.0	5.0	4.8	4.8
Azerbaijan	3.4	3.6	3.8	3.8	3.0	3.4
Belarus	2.7	2.7	3.1	3.1	2.2	2.2
Georgia	4.7	5.6	4.1	5.8	5.3	5.3
Moldova	4.7	4.7	4.8	4.8	4.5	4.5
Ukraine	5.3	5.3	5.4	5.4	5.1	5.1
AVERAGE	4.3	4.5	4.4	4.7	4.2	4.2

Table II: Comparative 2024 versus 2023 CSO Meter scores for Area 2 (*Equal Treatment*).

States widen the disparities in how they treat CSOs, both in relation to businesses and among CSOs themselves. The overall score in this area has decreased from 4.5 in 2023 to 4.3 in 2024. Azerbaijan and Georgia saw a deterioration in their overall scores

due to restrictions, for instance in access to foreign funding, which do not extend to other sectors. Armenia has the highest overall score (4.9), while Belarus has the lowest score (2.7). In general, in the region, registration procedures (timelines, fees and other aspects), reporting requirements, access to funding and taxation and other benefits are more favourable for the business sector compared to CSOs. In all countries of the region, there is preferential treatment for certain CSOs, mostly based on unclear criteria.

States deepen their unequal treatment of CSOs as compared to businesses

All countries of the region provide registration procedures for CSOs which are either more expensive, more time-consuming, not available online and/or more burdensome compared to for business entities. Registration for CSOs in practice in Belarus and Azerbaijan is restricted as compared to businesses. In Azerbaijan, foreigners and stateless persons can be founders of business entities, but founders of CSOs are required to have permanent residency in Azerbaijan. Also, any foreign citizen can invest in a business, whereas foreign funding in the form of a donation from a foreigner to a CSO is not allowed.

Burdensome reporting requirements, intense oversight and disproportionately high fines are used to crackdown further on CSOs in Belarus and Azerbaijan. In Georgia, the new Law on Transparency of Foreign Influence adopted in 2024 added additional administrative burdens and stricter deadlines. For instance, CSOs that receive more than 20 per cent of their funding from foreign sources must not only disclose these sources but also register as ‘Implementing Organisations of Foreign Power Interests’ (IOFPs). The same does not apply to businesses. In the other countries of the region, reporting is generally more burdensome for CSOs compared to businesses. Also, in Moldova, a failure to submit an annual report may serve as a reason for termination of a CSO, unlike for a business.

When accessing funding from any domestic and/or foreign source and state-related benefits, CSOs are disadvantaged compared to businesses. In Belarus and Azerbaijan, basic access to funding – particularly foreign funding – is restricted and other barriers are imposed on different funding sources for CSOs as compared to businesses (for instance, associations cannot engage in entrepreneurial activities in Belarus). Similarly, in Georgia, the Law on Transparency of Foreign Influence introduced in

2024 provides for heightened scrutiny of and administrative load on CSOs that access any sources and amounts of foreign funding. This acts as a deterrent, potentially limiting the inflow of foreign funding which is crucial for the survival of many CSOs. In all countries of the region, CSOs face difficulties in participating in public procurement tenders as compared to businesses. In Azerbaijan and Belarus, access to public procurement is severely limited, while in Moldova, CSOs face burdensome requirements such as bank certificates (with a 2 per cent guarantee), a certificate of proper performance of the contract (a bank guarantee of a maximum of 15 per cent for the winner of the contract) and delayed payment for services, which cannot be fulfilled by CSOs in the absence of available liquidity. In Ukraine, CSOs need to appoint an authorised individual to, among other things, organise and conduct the procurement procedure, to establish a tender committee and to confirm the level of knowledge in the field of public procurement.

States deepen their preferential treatment of certain CSOs

In all countries of the region, certain CSOs enjoy preferential treatment regarding state funding and in-kind support (for instance, certain CSOs that work with persons with disabilities in Moldova and Ukraine and children, youth, and veterans' CSOs in Ukraine). However, this preferential treatment is not based on clear criteria. In Belarus and Azerbaijan, the governments use this treatment to ensure control over the operation of organisations. In Belarus, the Law on the Republican Budget for 2024 channels state finance to three state-public associations and two state-linked organisations: the Belarusian Union of Writers and the Belarusian Republican Youth Union, which receives an annual budget allocation of approximately 4 million EUR. The distribution of financial resources from the public purse to pro-government organisations is also addressed in the decisions on the local (regional, district, city) budgets. Other countries also report differential treatment for certain groups of CSOs. In Moldova, for instance, a preferential annual subsidy from the state budget is only available to a limited number of CSOs for persons with disabilities.

CSOs take part in legal and policy making processes, e.g. through working groups and consultative meetings. But partners in all countries report that opinions and input by those CSOs that are more critical, are simply not considered. The most extreme example is in Belarus, where state policy aims to eliminate CSOs that oppose the government, discredit undesirable organisations, promote state-linked groups, and

engage with compliant CSOs for social or cultural projects. There is also a growing divide between CSOs operating abroad under more favourable conditions and those remaining in Belarus, where only pro-government organisations have access to decision-making spaces, leading to inequality and special treatment for government-aligned entities. In addition, state officials discredit and stigmatise ‘critical’ CSOs that engage in watchdog and advocacy activities. This occurred particularly in the context of elections. In 2024, Georgia adopted the Law on Family Values and the Protection of Minors, severely restricting LGBTQ+ organisations from public engagement, threatening their operations and existence. Additionally, CSOs receiving foreign funding must register as serving ‘foreign interests’ which reinforces stigmatisation. Similar negative rhetoric targeting CSOs was also seen in Moldova during its electoral period.

Area 3: Access to Funding

	Overall		Law		Practice	
Area 3	2024	2023	2024	2023	2024	2023
Armenia	5.3	5.3	5.8	5.8	4.8	4.8
Azerbaijan	2.8	3.0	3.0	3.2	2.5	2.8
Belarus	2.2	2.2	2.6	2.5	1.8	1.9
Georgia	4.1	5.6	4.3	6.0	3.8	5.1
Moldova	5.3	5.3	5.7	5.7	4.8	4.8
Ukraine	4.7	4.7	5.0	5.0	4.4	4.4
AVERAGE	4.1	4.4	4.4	4.7	3.7	4.0

Table III: Comparative 2024 versus 2023 CSO Meter scores for Area 3 (*Access to Funding*).

Access to funding has deteriorated from an average score of 4.4 in 2023 to 4.1 in 2024. The lead cause for this is the situation in Georgia, where the overall score has decreased significantly from 5.6 in 2023 to 4.1 in 2024 due to the enactment of the Law on Transparency of Foreign Influence and the impact of the registration of CSOs as foreign agents. Armenia and Moldova are the highest-scoring countries in this area, with an overall score of 5.3, followed by Ukraine, which scores 4.7. No notable changes in scores were documented in these countries. Meanwhile, Belarus and Azerbaijan score the lowest due to considerable restrictions in this area. Belarusian CSOs in exile in Georgia are also affected by Georgia's legislation concerning foreign funding restrictions.

Restrictions on foreign funding hamper CSO operations

In Georgia, the new Law on Transparency of Foreign Influence has significantly impacted the ability of organisations to seek foreign funding freely. The legislation

requires organisations receiving over 20 per cent of their funding from foreign sources to register as IOFPs. This registration could potentially deter international donors due to the stigma and bureaucratic hurdles associated with the label. As CSOs rely on international funding, the legislation may restrict their ability to function freely and effectively.

CSOs in Belarus and Azerbaijan face severe and further restrictions on both foreign and domestic funding, requiring pre-approval from state authorities for receiving foreign aid. Similarly, in Azerbaijan, CSOs face restrictive regulations on receiving and registering foreign financial aid and it is extremely difficult for CSOs to obtain government approval for grants. In July 2024, the Cabinet of Ministers introduced new burdensome financial reporting and grant registration requirements for CSOs comprising additional forms in addition to annual financial reports that must be filed to the Ministry of Justice by 1 April with fines for non-compliance.

Limited and inefficient infrastructure for accessing domestic sources of funding

In Belarus, strict limitations on accessing domestic funding persist. The government has made some efforts to improve CSOs' access to local funding, such as the enactment in 2024 of a new edition of Presidential Edict No. 300, which expands the opportunities and scope for sponsorship from Belarusian businesses. However, these measures are largely undermined by the country's systematic repression (encompassing the mass dissolutions of aid recipients, pressure on domestic donors, and the misuse of criminal charges for financing extremism) and closed civic space. In Georgia, while a new state grant programme aimed at supporting CSOs listed in the Ministry of Justice's registry was announced, the overall restrictive environment raises significant concerns about the further limitations on freedoms and lack of independence of CSOs, especially those critical of government policies or advocating for issues deemed controversial.

In Azerbaijan, existing state grants are disbursed via thirteen government donors, including the NGO Support Agency, being insufficient to ensure sustainability. Additionally, government contracts outsourcing social service operations to CSOs known as 'social orders' are exclusively issued by the Ministry of Labour and Social Protection. However, only a few CSOs benefit from these contracts, which typically focus on specialised areas such as care centres.

Progress in identifying varied obstacles to access to funding

While Moldova, Ukraine, and Armenia legally allow CSOs to seek and receive funding, taxation or bureaucratic barriers and unsupportive broader fiscal and financial regulations make accessing and managing funding challenging. In Moldova, CSOs benefit from a relatively low-tax environment. However, in relation to crowdfunding,

for instance, the new Law on Crowdfunding Services (2024) does not apply to CSOs, excluding them and channelling support to other sectors. Additional limitations include the lack of SMS donation services, a ban on cryptocurrency ('virtual assets') transactions, and the high cost and complexity for CSOs to install a donation function on their websites. In Ukraine, CSOs reported difficulties related to cross-border financial transaction restrictions and the financial monitoring measures and additional documentation imposed by banks. Armenia has the most challenging taxation policies, including VAT on grants, which create financial burdens that discourage the growth of CSOs. Also, as in previous years, the audit requirements for projects funded from public sources in Armenia are disproportionate and burdensome. Set by law, they continue to affect CSOs' access to funding unfavourably, as many organisations lack free (unrestricted) funds to cover audit costs.

Area 4: Freedom of Peaceful Assembly

	Overall		Law		Practice	
Area 4	2024	2023	2024	2023	2024	2023
Armenia	5.2	5.3	5.7	5.7	4.7	4.9
Azerbaijan	3.4	3.7	4.0	4.4	2.8	3.0
Belarus	1.5	1.5	1.9	1.9	1.1	1.1
Georgia	2.9	4.5	3.1	5.2	2.7	3.8
Moldova	5.3	5.3	5.5	5.4	5.0	5.1
Ukraine	4.7	4.7	4.9	4.9	4.5	4.5
AVERAGE	3.9	4.2	4.2	4.6	3.5	3.7

Table IV: Comparative 2024 versus 2023 CSO Meter scores for Area 4 (*Freedom of Peaceful Assembly*).

The right to peaceful assembly, particularly in practice, has deteriorated in Armenia, Azerbaijan, Georgia, and Moldova. In Belarus, exercising this right often results in detention, prosecution, and ill-treatment. In Ukraine, civil society operates under martial law, which imposes restrictions. The overall score in this area has decreased from 4.2 in 2023 to 3.9 in 2024, reflecting several documented instances of prosecution of assembly participants and the use of disproportionate force by police during 2024.

In Georgia, the score dropped significantly from 4.5 to 2.9, indicating deterioration in both Legislation and Practice. The Law of Georgia on Family Values and the Protection of Minors, along with related amendments, unduly restricts the right to assemble by banning any manifestation that 'popularises nontraditional relationships', effectively prohibiting assemblies by LGBTQ+ individuals. During the ongoing protests in April and May 2024, there were significant violations of the freedom of assembly.

In Azerbaijan, individuals and CSOs face significant obstacles when exercising their right to peaceful assembly. Only in Moldova did the Legislation score increase (from 5.4

in 2023 to 5.5 in 2024) due to the end of the state of emergency and the lifting of previous legal restrictions. However, the Practice score declined slightly from 5.1 in 2023 to 5.0, due to repeated and disproportionate interventions by law enforcement at peaceful public assemblies organised by opposition political groups.

Increased crackdown and excessive use of force by police

The situation in Georgia exemplifies the authorities' crackdown on the right to protest. During the April and May 2024 protests, triggered by the approval of the Law on Transparency of Foreign Influence, protesters were subjected to systematic violence by law enforcement – often encouraged by high level political officials. Criminal and administrative laws were used to intimidate protest participants. Additionally, psychological and physical violence was used to harass protesters, supporters, civil activists, journalists, politicians, and their family members. Peaceful assembly remains severely restricted in Belarus and Azerbaijan. In Belarus, the legislative restrictions established in 2021, which prohibit the broadcasting of mass events and impose criminal liability for repeated violations of rally procedures, continue to be enforced. In 2024, at least 1,019 people were prosecuted under Article 342 of the Criminal Code for 'grossly violating public order', and twenty-four people were charged with 'mass riots' under Article 293. Since 2020, the authorities have repeatedly used torture and arbitrary arrests.

By contrast, despite the legal regime of martial law and the ongoing threats from war, organising and holding peaceful assemblies remains possible in most regions of Ukraine, although their frequency remains low. In Armenia and Moldova, violations were noted in practice. In Armenia, the state has failed to guarantee and protect freedom of assembly in numerous instances. Incidents of arbitrary detentions, brutal treatment and the alleged illegal use of stun grenades were reported, with no meaningful sanctions applied to police officers who violated the law. In Moldova, the exercise of this right was instrumental for political actors during the referendum on EU accession and the presidential elections held in 2024. However, isolated cases of law enforcement interference with peaceful assemblies were reported during these events.

Legal developments to improve peaceful assembly

In Moldova, the end of the state of emergency and the lifting of all restrictions previously imposed during the Covid-19 pandemic and the state of emergency related to the Russian invasion of Ukraine marked a step forward. Additionally, the Ministry of Internal Affairs introduced a Draft Law on Public Events to regulate a wider range of gatherings beyond traditional public assemblies; however, the draft's vague provisions did not adequately address practical needs and will require further consultation. In Armenia, legislative reforms were proposed, including the adoption of a new Law on

Police Guards and amendments to the Law on Freedom of Assembly. These aim to strengthen the rights of assembly participants by simplifying notification procedures and removing the time limit for spontaneous or urgent gatherings, thereby reducing the risk of disproportionate or inconsistent police actions.

Area 5: Right to Participation in Decision-Making

	Overall		Law		Practice	
Area 5	2024	2023	2024	2023	2024	2023
Armenia	4.9	4.9	5.4	5.4	4.3	4.3
Azerbaijan	4.3	4.6	5.0	5.0	3.5	4.1
Belarus	2.6	2.6	3.1	3.1	2.1	2.1
Georgia	4.3	4.8	5.3	5.3	3.3	4.2
Moldova	5.0	4.9	5.4	5.3	4.5	4.4
Ukraine	4.8	4.7	5.2	5.1	4.3	4.3
AVERAGE	4.3	4.4	4.9	4.9	3.7	3.9

Table V: Comparative 2024 versus 2023 CSO Meter scores for Area 5 (*Right to Participation in Decision-Making*).

The overall average score for Right to Participation in Decision-Making decreased from 4.4 in 2023 to 4.3 in 2024. The average score in Legislation remained the same as in 2023, while the average score in Practice decreased from 3.9 to 3.7. Moldova and Ukraine noted improvements in overall scores in this area due to the introduction of favourable legislation. In Ukraine, the score for Legislation improved from 5.1 in 2023 to 5.2 in 2024, the overall score increasing to 4.8, compared to 4.7 in the previous year. In Moldova, the score for legislation increased to 5.4 in 2024 (up from 5.3 in 2023) as a result of amendments to transparency legislation, enforcement of the Law on Access to Information of Public Interest, and the introduction of new participation formats (some of these addressing the 2023 CSO Meter recommendations). Moldova additionally noted an improvement in Practice from 4.4 in 2023 to 4.5 in 2024, reflecting slight improvements in transparency and participation at the local level.

Georgia saw a decrease in its overall score in this area (from 4.8 to 4.3), due to a deterioration in Practice from 4.1 to 3.3. The Law on Transparency of Foreign Influence significantly worsened relations between state institutions and civil society, negatively affecting participation. The situation was further worsened by the termination of Georgia's membership in the OGP. Deterioration in the overall score was also noted in Azerbaijan, driven by the lower score for Practice as a result of the lack of CSO participation in the COP29 climate change conference, pressure on active civil society and the suspension of Azerbaijan's membership in the Parliamentary Assembly of the Council of Europe.

Legal reforms to advance participation and access to information

In several countries, legislation was introduced facilitating participation, public consultations, and the public's access to information. In Moldova, the Law on Access to Information of Public Interest entered into force, while in Armenia a draft Law on Public Information was presented by the government. In Moldova, participation was also legislatively enhanced by the launch of expert councils with CSO representatives to support the work of parliamentary committees. Government ministries have also established new consultative platforms, although concerns remain over insufficient CSO representation. While martial law continues to affect participation in Ukraine, several laws were adopted, including the Law on Ensuring Transparency of Local Self-Government, the Law on Public Consultations, and the Law on People's Power at the Level of Local Self-Government. These laws introduce important safeguards for participation, including involving the public in early stages of policy formation, reporting on consultation results and introducing a single web portal for public consultations. Participation also saw a slight improvement in Belarus. Following state-run public discussions on a new draft Code of Civil Justice, CSOs succeeded in restoring the right to appear in civil courts and have therefore been able to keep this method in their toolbox of operations.

CSOs face selective and superficial participation in decision-making processes

In many countries, CSOs report numerous challenges with the implementation of participation legislation and existing mechanisms, such as a lack of enforcement of participatory processes, which often renders legislation on participation symbolic; no requirement to consider public input; public involvement only occurring in the later stages of policymaking; and the selective invitation of CSOs to public consultations. One of the most common challenges is the exclusion of critical CSOs or the hindrance of participation altogether when it comes to policymaking on specific 'sensitive' issues, such as environmental matters (in Armenia) or transparency and anti-corruption (in Georgia). In Armenia, environmental activists in particular face SLAPPs on the basis of libel and insult accusations by mining companies, along with compensation claims. Meanwhile in Georgia, in August 2024, Transparency International Georgia and the International Society for Fair Elections and Democracy withdrew from the Advisory Group of the Central Election Commission, citing a flawed selection process that undermined the credibility and effectiveness of CSO representation. The Law on Transparency of Foreign Influence adopted in Georgia is expected to have a chilling effect on the participation of CSOs in the public exchange of views and consultations and the law will negatively impact the legitimacy of those organisations that are labelled as representing foreign interests when engaging in public participation. In Azerbaijan and Belarus, participation is only available to CSOs aligned with the government. In Ukraine, although perhaps understandable under martial law, increased secrecy of state institutions can hinder the participation of CSOs.

Growing risks for CSOs due to insufficient distinction between public participation and lobbying or political activities

In several countries, CSOs experience restrictions on their work due to the inaccurate conflation of public participation with commercial lobbying or party politics. In Ukraine, a new Law on Lobbying was introduced in 2024 which excludes CSO activities 'except when such activities relate to commercial interests'. The risks of this classification for CSOs remain to be

seen and much will depend on the Law's implementation. In Georgia, while legislation on lobbying does not present a threat, the recent decision to declare certain CSOs as 'persons with electoral goals' has infringed on the public right to participation and unduly blurred the lines between public oversight and party politics.

Area 6: Freedom of Expression

	Overall		Law		Practice	
Area 6	2024	2023	2024	2023	2024	2023
Armenia	4.8	4.7	5.2	5.2	4.3	4.2
Azerbaijan	3.4	3.9	4.2	4.6	2.5	3.1
Belarus	1.8	1.8	2.4	2.4	1.2	1.2
Georgia	4.2	4.9	4.7	5.6	3.6	4.1
Moldova	5.0	5.0	5.4	5.4	4.6	4.6
Ukraine	4.9	4.9	5.5	5.5	4.2	4.2
AVERAGE	4.0	4.2	4.6	4.8	3.4	3.6

Table VI: Comparative 2024 versus 2023 CSO Meter scores for Area 6 (*Freedom of Expression*).

The overall average score for the area of Freedom of Expression decreased from 4.2 in 2023 to 4.0 in 2024. In 2024, the scores remained unchanged in Moldova and Ukraine, while there has been some progress in this area in Armenia, its overall score in this area increasing from 4.7 to 4.8 due to a higher score for Practice (from 4.2 in 2023 to 4.3 in 2024).

As in other areas, Georgia's overall score declined from 4.9 in 2023 to 4.2, with declines for both Legislation and for Practice. A key factor in this was the negative impact of the Law on Family Values and the Protection of Minors, which prohibits the dissemination of any information pertaining to LGBTQ+ issues. This restriction affects activism and creative, scientific, and academic activities, violating international standards and creating a chilling effect on activists, artists, scientists, law enforcement, and academics.

Armenia's increase in scores can be attributed to positive trends in collaboration on media reforms, efforts to combat disinformation, and the increased use of extrajudicial mechanisms to resolve defamation claims.

Belarus and Azerbaijan have the lowest scores in this area due to the minimal spaces for independent media and ongoing censorship, while, in Belarus, there is also criminalisation of expression under the pretext of fighting extremism and hate speech. While the scores for Belarus remained the same as in 2023, Azerbaijan's score for Practice has deteriorated due to an escalation of attacks against journalists.

Attacks on journalists and misuse of the legal system to deter critical speech

In Armenia, there were numerous reports of physical violence against journalists and obstruction of media representatives during protests in April and June 2024. Similarly, in Georgia, journalists faced aggressive rhetoric and assaults from high-ranking government officials in the context of protests against the 'foreign agents law'.

Countries in the region continue to misuse their legal systems to deter critical speech. Defamation cases against journalists are prevalent, creating a chilling effect that hinders free expression. In Armenia, journalists and activists are facing multiple legal proceedings claiming compensation for alleged defamation and insult. While a growing tendency of officials settling issues through extrajudicial measures was reported in 2024, the practice of suing journalists continues to generate an environment of intimidation.

In Ukraine, despite a lack of confirmed information on cases of convictions of journalists or searches of media to disclose sources of information, there has been a surge in the persecution of anti-corruption activists and investigative journalists. This includes covert surveillance of the team from the independent investigative journalism outlet Bihus.Info, an attack on the residence of journalist Yuriy Nikolov, and a number of other cases of direct pressure on media professionals. In addition, the effects of the war in Ukraine on freedom of expression are devastating. In the two years and six months since the start of Russia's full-scale invasion, according to data from the Institute of Mass Information, Russia has committed some 620 crimes against journalists and media in Ukraine.

In Moldova, while not a systematic issue, politicians often sue the authors of statements that scrutinise their activities for defamation, leading to wasted time and resources for media institutions.

Belarus remains highly restrictive, with dozens of journalists, bloggers, and media workers arrested, searched, and prosecuted, raising the total number of imprisoned media representatives to over forty-five. A notable example is the conviction of Volha Radzivonava, a freelance journalist who contributed to the authoritative German newspaper *Die Tageszeitung*. She was sentenced to four years in prison in December 2024 for discrediting Belarus, insulting and slandering the president, and inciting discord. This case sets a new precedent, as such sentences were previously reserved for individuals associated with Belarusian exile publications.

Attempts to tackle disinformation remain insufficient

Efforts to tackle disinformation remain insufficient throughout the region. In Moldova, the government's efforts to combat disinformation led to a new mechanism from December 2023 to suspend licences for TV channels connected to fugitive oligarchs promoting manipulative content. The Audiovisual Council issued its first fines for

disinformation based on the legal definition and the methodology adopted in 2023, but the process has been criticised for its lack of transparency. CSOs continue to advocate for a predictable, clear and transparent mechanism to tackle disinformation, including procedural guarantees and an appeals procedure. In Armenia, steps were taken in 2024 to implement the National Concept for Combating Disinformation, such as establishing a working group to coordinate efforts aimed at improving media literacy, organising capacity-building events for government employees, holding coordination meetings with state agencies to plan and implement communication strategies, and developing partnerships with private media companies to conduct awareness campaigns.

Disinformation campaigns in Georgia have intensified, particularly during the mass protests and the parliamentary election campaign. Reports by Meta and the Digital Forensic Research Lab reveal that government-affiliated actors, including the Strategic Communications Department of the Government Administration of Georgia (StratCom), have spread false narratives online to discredit opposition voices and demonstrations, especially those in opposition to the ‘foreign agents law’.

Area 7: Right to Privacy

	Overall		Law		Practice	
Area 7	2024	2023	2024	2023	2024	2023
Armenia	4.9	4.9	5.8	5.8	3.9	3.9
Azerbaijan	4.1	4.4	4.6	4.9	3.5	3.8
Belarus	2.4	2.4	3.3	3.3	1.5	1.5
Georgia	3.4	3.9	4.0	4.7	2.8	3.0
Moldova	4.3	4.3	5.2	5.2	3.4	3.4
Ukraine	4.1	4.1	4.9	4.9	3.2	3.2
AVERAGE	3.9	4.0	4.6	4.8	3.1	3.1

Table VII: Comparative 2024 versus 2023 CSO Meter scores for Area 7 (*Right to Privacy*).

The overall average score in the area of Right to Privacy deteriorated from 4.0 in 2023 to 3.9 in 2024. Except for Georgia, where a significant decline is noted from 3.9 in 2023 to 3.4 in 2024, and a decrease in Azerbaijan from 4.4 in 2023 to 4.1 in 2024, the situation in this area in the other four countries remained similar compared to the previous year.

The right to privacy is protected in various legislative frameworks across all countries. Each country has established legal provisions that aim to protect personal privacy, often influenced by international standards such as the European Union's General Data Protection Regulation (GDPR). A critical challenge faced by the EaP countries is the weak enforcement of existing privacy laws, which leads to a lack of accountability for privacy violations.

Expansion of state surveillance further reduces the space for CSOs' operation

In Armenia, proposed amendments to the Law on Police have raised significant concerns among CSOs that they will allow the police an unrestricted access to surveillance cameras in businesses and public places, creating a potential for misuse of personal data and raising fears of a surveillance state. In Belarus, extensive state surveillance measures have resulted in widespread abuse of personal data (where the main threat to CSOs is in the electronic sphere, including in matters of donations.). In Moldova, there are notable concerns about the lack of effective legal recourse for privacy invasions. A significant case involved the unlawful interception of communications and video recordings of several high-profile politicians and activists, which has yet to result in accountability for the perpetrators. Similarly, Ukraine faces challenges in enforcing privacy rights, especially under martial law, where reports of unauthorised surveillance of journalists and activists have become more frequent. For example, security services have been implicated in covertly monitoring the communications of independent media outlets. The issue of protecting the right to privacy in the temporarily occupied territories, where Russia commits systemic violations, remains particularly acute. In Ukraine, CSOs highlight the potential for abuse, as proposed legislation aims to expand the surveillance powers of counterintelligence agencies without adequate oversight mechanisms. In Georgia, the practical implementation of the state's duty to respect the right to privacy shows worrying trends, with leaked documents illustrating the illegal surveillance of CSOs and associated individuals.

Privacy infringements and lack of accountability undermine civil society

In Georgia, although the legal framework nominally prohibits unauthorised surveillance, weak judicial oversight enables security agencies to conduct intrusive monitoring with little to no external control. The recently adopted Law on Transparency of Foreign Influence further exacerbates concerns by compelling CSOs to disclose sensitive personal and financial information about their members and donors, exposing them to potential targeting and reprisals. Similarly, in Armenia, CSOs have criticised the state's failure to act on the lack of oversight and accountability mechanisms for surveillance by law enforcement bodies. Across the region in general, the absence of effective redress mechanisms allows privacy infringements to persist with impunity, eroding public trust and constraining the operational space for civil society.

Area 8: State Duty to Protect

	Overall		Law		Practice	
Area 8	2024	2023	2024	2023	2024	2023
Armenia	4.5	4.5	5.2	5.2	3.8	3.8



Azerbaijan	4.0	4.4	4.5	4.7	3.5	4.1
Belarus	1.9	1.9	2.5	2.5	1.2	1.2
Georgia	3.8	4.4	4.4	5.0	3.2	3.8
Moldova	4.6	4.6	5.0	5.0	4.2	4.2
Ukraine	3.7	3.7	4.0	4.0	3.4	3.4
AVERAGE	3.8	3.9	4.3	4.4	3.2	3.4

Table VII: Comparative 2024 versus 2023 CSO Meter scores for Area 8 (*State Duty to Protect*).

The countries across the EaP region continue the trend of failing to fulfil their duty to protect civil society. The overall average score in this area has decreased from 3.9 in 2023 to 3.8 in 2024. Two countries recorded changes in score from 2023 – namely, Azerbaijan and Georgia saw a deterioration in their overall score, due to the lack of an environment free from intimidation (or also violence in Georgia) as witnessed particularly in relation to the continuous protests against CSOs, activists, and journalists. Moldova has the highest overall score (4.6), while Belarus has the lowest score (1.9).

Legal guarantees and mechanisms for state protection of CSOs and individuals vary by country. They are set out in different legal documents and include the right to appeal state actions, to challenge registration denials, to represent CSOs and related individuals in court and to conduct strategic litigation. While some legal frameworks ensure protection from hate speech and discrimination, others lack explicit safeguards for vulnerable groups. The AML/CTF laws in most of the countries impose risk-based oversight, while, in Azerbaijan and Belarus, they require extensive financial scrutiny and provide for severe penalties. In Belarus, extremism laws are broadly defined and abused to crackdown against any opposition. In practice, states largely failed to fulfil their duty to ensure the legal guarantees to protect civil society.

States legally repress, imprison, criminalise and stigmatise CSOs and activists – including LGBTQ+ groups, environmental defenders, human rights advocates and watchdog organisations

Azerbaijan and Belarus continued their crackdown on civil society, activists, and opposition groups, with Azerbaijan holding 331 political prisoners and Belarus at least 1,317 political prisoners by the end of 2024. In both countries, state-backed media engaged in smear campaigns against civil society members, journalists, and activists. In Belarus, killings in previous years and documented instances of torture remain

unpunished, while hate speech and incitement to violence – including the justification of torture – are widely broadcast by state media. In Georgia, the adoption of the Law on Transparency of Foreign Influence fuelled hostility toward CSOs, journalists, and activists, creating an environment of increased violence against civil society actors. CSO representatives, particularly those advocating for transparency and human rights, experienced numerous incidents of threats, physical violence, and attacks, including at their homes or offices.

SLAPPs, harassment, and defamatory media narratives continued to target activists. In Armenia, environmental activists raising concerns about the Amulsar gold mining project were particularly targeted, receiving insufficient protection from law enforcement to exercise their freedoms. In Moldova, an analysis by the Legal Resources Centre from Moldova (LRCM) found that 70 per cent of thirty-seven media-related cases brought before the Supreme Court between 2019 and 2023 were rejected, suggesting that they were SLAPPs aimed at silencing the media. LRCM also notes a significantly higher number of such cases in the lower courts.

LGBTQ+ groups across the region continued to face legal restrictions and a rise in hate speech. In 2024, Georgia adopted the Law on Family Values and the Protection of Minors which restricts LGBTQ+ rights. The Law includes a ban on same-sex marriage (even though this is already banned in the constitution), provides for censorship of LGBTQ+ content, bans gender reassignment surgeries and related legal procedures, and outlaws public assemblies related to LGBTQ+ issues. Hate speech targeting LGBTQ+ communities in diverse media is widespread in Georgia and Belarus.

In Armenia, although discussions on anti-discrimination legislation advanced, proposed measures excluded protections for sexual orientation and gender identity, contrary to the recommendations of CSOs and international bodies. In contrast, in Moldova, law enforcement protected the LGBTQ+ Pride events.

State and financial institutions misapply and/or abuse AML/CTF and anti-corruption measures to burden civil society

In Belarus, the government continues to misuse anti-terrorism and extremism laws to silence opponents, block websites, and impose disproportionate AML/CTF measures that harm CSOs. By the end of 2024, 257 groups, including CSOs, media, and online

communities, were extrajudicially labelled as 'extremist formations' since the introduction of the legislative regulation of this term in 2021.

In 2024, MONEYVAL, the Council of Europe's anti-money laundering body, downgraded Azerbaijan to only 'partially compliant' on Recommendation 8, urging balanced risk mitigation for CSOs so that there are not undue restrictions. Georgia's failure to request a reassessment by MONEYVAL on Recommendation 8 left gaps in its CSO regulation, while Moldova's Financial Intelligence Unit launched its Terrorist Financing Risk Assessment which classifies CSOs as entities of 'high risk', despite no evidence of terrorist financing. In Ukraine, a review by the State Financial Monitoring Service published in October 2024 labelled CSOs as 'high-risk' based on vague criteria, raising concerns over financial sustainability. In parallel, Ukrainian CSOs developed a shadow risk assessment offering recommendations.

In Armenia, Moldova and Ukraine, there are challenges for CSOs with the definition of and the need to determine its UBOs. In Armenia, CSOs now face double fees, paying 24 EUR for UBO data changes and 12 EUR for the same updates in registration documents. In Moldova, AML/CTF banking policies hinder CSO fundraising through high commission fees, rejected foreign donations, and strict scrutiny of crowdfunding. The Azerbaijani government imposes heavy financial reporting burdens on CSOs, while Belarusian banks must check CSOs' transactions align with their statutory objectives.

In September 2024, the Georgian Anti-Corruption Bureau designated two prominent Georgian CSOs as 'persons with a declared electoral goal'. This designation did not align with international standards and effectively prevented the organisations from conducting their usual election observation and other electoral process-related activities.

Area 9: State Support

	Overall		Law		Practice	
Area 9	2024	2023	2024	2023	2024	2023
Armenia	4.1	4.1	4.3	4.3	3.9	3.9
Azerbaijan	3.9	4.1	4.0	4.4	3.7	3.9
Belarus	2.4	2.4	2.8	2.8	1.9	1.9
Georgia	4.1	4.2	4.4	4.4	3.7	4.0
Moldova	4.4	4.4	4.7	4.7	4.0	4.0
Ukraine	4.4	4.4	4.7	4.7	4.0	4.0

AVERAGE	3.9	3.9	4.2	4.2	3.5	3.6
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Table IX: Comparative 2024 versus 2023 CSO Meter scores for Area 9 (*State Support*).

In 2024, State support for civil society was the only area across the region that remained overall at the same level as in 2023 — but in Practice, the average score declined slightly, from 3.6 to 3.5. This drop was driven by decreases in Azerbaijan and Georgia. In Azerbaijan, insufficient state support in addition to foreign funding limitations on CSOs have been accumulating over the years, making financial sustainability almost impossible for independent CSOs. In addition, in 2024, new legislation created an additional administrative burden regarding reporting. In Georgia, overall cooperation between the state and CSOs significantly deteriorated, which is also visible in the fields of funding and support. The other countries remained at the same level in this area. Moldova and Ukraine have the highest scores (4.4) and Belarus has the lowest score (2.4). However, this area has (among) the lowest scores compared to other areas, which means it is less developed and has made less progress in both Legislation and Practice.

Underdeveloped and misused state support undermines independent civil society

Throughout the EaP region, the situation regarding public funding for civil society organisations is characterised by minor and limited resources and a fragmented approach. While various mechanisms exist for state funding, such as grants and contracts, the amounts allocated often fall short of meeting the financial needs of CSOs. In 2024 in Azerbaijan, the state funding approach is facing a downward trend and is focussed on exclusively-selected government-aligned organisations, leaving independent CSOs at a disadvantage. Additionally, new regulations were introduced that significantly increased the administrative burden on CSOs in Azerbaijan, particularly concerning financial reporting and grant registration. In Georgia, the government announced the establishment of a separate state fund for CSOs in 2024. The fund is used as a way to exert control over civil society and to provide support to CSOs that are aligned with the ruling Georgian Dream party. Armenia and Moldova offer competitive grant processes, but technical complexities and bureaucratic hurdles often hinder access. In wartime conditions, Ukraine continues to employ various funding mechanisms, albeit with limited resources and involvement from CSOs in the funding cycle, though efforts are made to engage CSOs in service provision.

Unsupportive tax regimes hinder CSO sustainability

The tax environment for CSOs varies significantly among the six EaP countries, with most imposing unfavourable conditions. In Azerbaijan and Belarus, tax regulations

impose burdens on civil society and activists. In 2024 in Belarus, the tax authorities and the financial police conducted checks on individuals who donated money to foreign funds to help victims of political repression in Belarus (especially through crowdfunding platforms). Starting 1 January 2024, Belarus required CSOs to file tax returns electronically, removing the paper filing option, which has led to additional costs for CSOs now requiring digital keys. However, due to the difficulty of obtaining digital keys, especially for organisations outside Belarus, the government reversed the change in December 2024, again allowing paper filing for the 2024 and 2025 tax years. Additionally, a December 2024 revision eliminated the investment tax deduction for CSOs (effective 1 January 2025), making it available only to commercial organisations.

In Azerbaijan, the state imposed stricter conditions in relation to several tax-related laws that apply to CSOs, worsening the tax environment for CSOs compared to in previous years. As of January 2024, the Tax Code requires micro-entrepreneurs to have at least three employees and no social insurance debt to qualify for a 75 per cent tax exemption, increasing the financial burden for organisations that no longer qualify. Most CSOs face a tax increase from 5 per cent to 20 per cent for commercial contracts, especially those registered as individual taxpayers. However, tax exemptions for gifts, tuition aid, and allowances have risen to around 1,300 EUR, and exemptions for transfers to enterprises in the fields of science, education, and other sectors have increased to 15 per cent until 2029. Micro-entrepreneurs, including CSOs, can also deduct 25 per cent of their social insurance payments from income taxes for up to three years.

Moldova provides some exemptions for specific activities but still imposes income taxes and social contributions on employees. The overall lack of tax incentives for individual and corporate donors further discourages philanthropic activities. Moldova is the only country with an applicable percentage designation, which is showing a growing trend (0.74 million EUR in 2024) but is still far from reaching its full potential. In Armenia and Georgia, although tax exemptions exist for certain charitable activities, the benefits for businesses and individuals remain limited. For instance, corporate tax deductions are often minimal, and bureaucratic processes deter businesses from capitalising on available incentives. This has led to a situation where, in practice, a number of business entities allocate funds to CSOs for social, educational, healthcare, and environmental issues; however, they prefer not to apply for the tax deduction to avoid the associated time-consuming and complicated procedures. Ukraine stands out as the only country that has established a clear framework for tax exemptions for grants and donations. The non-profit status exempts CSOs from paying income tax. In addition, there is a possibility of applying a tax refund mechanism, as well as a number of other tax exemptions, such as for humanitarian aid and charitable assistance.

Area 10: State–CSO Cooperation

	Overall		Law		Practice	
Area 10	2024	2023	2024	2023	2024	2023
Armenia	4.0	4.0	4.3	4.3	3.6	3.6
Azerbaijan	3.8	4.0	4.1	4.3	3.5	3.9
Belarus	2.3	2.3	2.7	2.7	1.9	1.9
Georgia	2.8	4.0	3.1	4.2	2.5	3.7
Moldova	4.3	4.3	4.6	4.5	4.0	4.0
Ukraine	5.3	5.3	5.7	5.7	4.8	4.8
AVERAGE	3.8	4.0	4.1	4.3	3.4	3.7

Table X: Comparative 2024 versus 2023 CSO Meter scores for Area 10 (State–CSO Cooperation).

State–CSO cooperation deteriorated from an overall average score of 4.0 in 2023 to 3.8 in 2024. The scores remained unchanged in Armenia, Belarus and Ukraine, while Moldova made some progress, increasing its Legislation score from 4.5 in 2023 to 4.6 in 2024. In contrast, Georgia's overall score declined from 4.0 in 2023 to 2.8 in 2024, as did Azerbaijan's – from 4.0 in 2023 to 3.8 in 2024, with deteriorations in score noted in both Legislation and in Practice for both countries. Aside from the negative impact of the 'foreign agents law' on relations between CSOs and the state in Georgia, there have not been significant changes in this area.

Strategic approaches continue to improve civil society work

In 2024, Moldova and Ukraine have developed dedicated strategic documents and action plans to enhance civil society. Despite the ongoing full-scale invasion, cooperation between CSOs and the state continues in Ukraine, being one of the country's highest-scoring areas. There is a clear plan to develop an Action Plan for the development of civil society in Ukraine, with the involvement of CSOs in various formats, including consultations, strategizing, and gathering information through online platforms. In Moldova, the implementation of the Civil Society Organisation Development Programme for 2024–2027 commenced in 2024, although its progress remains unclear. Also in Moldova, the National Security Strategy emphasises cooperation between state institutions and civil society as one of its four guiding principles. In Armenia, the 2023–2025 Public Administration Reform Roadmap includes measures to strengthen participatory governance, with tools for public input and indicators for awareness and engagement. CSO collaboration is also addressed in key strategies on anti-corruption, gender policy, and human rights, as well as in legal regulations on multi-stakeholder committees.

Limited progress in advancing state–CSO cooperation and dialogue

Despite formal commitments to state–CSO cooperation and dialogue across the region, practical implementation remains limited. In Armenia, although the constitution provides for a Public Council, it has been inactive for several years. As for ministry-level public councils, only three of twelve ministries convened council meetings in 2024. The planned participatory governance unit under the Prime Minister’s Office, outlined in the OGP Action Plan, was approved in a December 2024 decree. Moldova shows more structured state–CSO cooperation through legislation and joint monitoring bodies. Ukraine has seen growing momentum in this area. A new law awaiting presidential approval (as of October 2024) aims to enhance participatory tools in local governance and increase the number of public councils (including doubling the number of public councils for internally displaced persons from 2023), indicating an expanding civic infrastructure.

In more repressive countries, cooperation between CSOs and the government is either non-existent or ineffective. In Belarus, many CSOs have intentionally ceased advocacy efforts and any form of contact with the authorities amid the prevailing atmosphere of repression. In Azerbaijan, the legal framework that allows CSOs to engage in decision-making processes is poorly executed in practice. State–CSO cooperation mainly occurs through the NGO Support Agency, but this interaction is limited and typically excludes CSOs from the decision-making process, leading to a decline in Azerbaijan’s score for Practice in this area. In Georgia, the passage of the Law on Transparency of Foreign Influence has raised serious concerns among CSOs about stigmatisation and restrictions on their operations. As a result, many CSOs have withdrawn from government-led platforms, such as the OGP Georgia Forum, effectively halting collaborative efforts.

Area 11: Digital Rights

	Overall		Law		Practice	
Area 11	2024	2023	2024	2023	2024	2023
Armenia	4.5	4.5	4.9	4.9	4.0	4.0
Azerbaijan	4.2	4.6	4.5	4.8	3.9	4.3
Belarus	2.1	2.1	2.6	2.6	1.5	1.5
Georgia	4.7	4.9	5.1	5.1	4.3	4.7
Moldova	4.3	4.3	4.5	4.5	4.1	4.0
Ukraine	4.8	4.8	5.1	5.1	4.4	4.4
AVERAGE	4.1	4.2	4.5	4.5	3.7	3.8

Table XI: Comparative 2024 versus 2023 CSO Meter scores for Area 11 (Digital Rights).

The average overall score in the area of Digital Rights decreased from 4.2 in 2023 to 4.1 in 2024. The average score for Legislation remained the same as in 2023 (4.5) but dropped for Practice – from 3.8 to 3.6.

In 2024, Georgia and Azerbaijan experienced a drop in their overall score for Digital Rights from 2023, while Moldova experienced an increase in its score for Practice. In both Georgia and Azerbaijan, there were no significant legal changes in this area, but the drop in the overall score was driven by a drop in the Practice scores. Georgia's overall score in this area decreased from 4.9 to 4.7 due to a change in the Practice score from 4.7 in 2023 to 4.3 in 2024, largely driven by state-sponsored online harassment and widespread disinformation against CSOs, activists and protesters. In Azerbaijan, the drop in the overall score (from 4.6 to 4.4) was driven by a decrease in the Practice score from 4.3 to 3.9. This was largely due to continued website blocking, connectivity issues during elections and new limitations on online media under the Media Law. Moldova was the only country that saw an increase in its Practice score for Digital Rights (from 4.0 to 4.1) and this was due to the publication of the White Paper on Data and AI Governance and the establishment of the Sub-Council on AI and Data Governance, with the participation of CSOs.

Most countries in the region have good internet coverage, but no specific legislation safeguarding digital rights. Often, officials in state and justice institutions lack a comprehensive understanding of digital rights and the legal system does not provide any specific remedies for violations of digital rights.

The internet is used to both facilitate and suppress movements

The internet, particularly the websites of independent media and CSOs, as well as social media, is used for a variety of purposes that facilitate an active civil society. These include digital crowdfunding, organising protests, or disseminating independent information. Digital mobilisation has been especially prominent in Georgia during the protests that have taken place throughout 2024. In more repressive environments, the internet facilitates repression. In Belarus, for instance, contributors to websites deemed as belonging to 'extremist formations' (including the websites of many CSOs) are found criminally liable. In Georgia, government agencies have been actively spreading disinformation about activists and demonstrators, as well as sponsoring social media advertisements criticising protesters. Website blocking is a common way to restrict access to information in Azerbaijan and Belarus. In Ukraine, website blocking occurs in the context of Russian aggression. While there are legal grounds for blocking websites through sanctions, the issue of proportionality and necessity remains unclear, raising concerns.

Surveillance is common and facilitated by AI lacking safeguards

Surveillance of activists has been reported in recent years in Armenia (including via spyware), Belarus (including surveillance on public transport) and in Georgia. In 2024,

two countries in the region, Georgia and Moldova, signed the Council of Europe Framework Convention on AI. However, in Georgia, experts report that AI systems, including facial recognition, are used by law enforcement without any proper accountability or standards for their use. Cooperation on developing standards for AI varies. In Moldova, there are examples of state–CSO cooperation in this area that is actively ongoing.

Full potential of digitalisation for CSOs and broader civic engagement is not yet realised

In most countries, government services that CSOs and activists can use to support their work (registration, reporting, participation in policy-making, applying for state support) exist and are scattered across multiple platforms. Several barriers, such as complicated verification procedures or fees for electronic signatures (for instance, for issuing reports or registration documents) make digital state services inaccessible. In several countries, there is also a lack of governmental initiatives to promote digital literacy and counter disinformation. In Armenia, it is mostly CSOs that are active in media literacy programmes and fact-checking activities. In Ukraine, a new draft law on regulating information-sharing platforms that disseminate mass information is set to be developed in line with the EU's Digital Services Act, with the participation of CSOs.

III. KEY PRIORITIES

In 2024, the civil society environment in the EaP region reached its lowest point since the first CSO Meter assessment conducted in 2021. The overall score declined from 4.2 in 2023 to 4.1, with notable deteriorations across all six countries in both the legal framework (from 4.6 to 4.5) and its practical implementation (from 3.8 to 3.6). At the same time, the civil society sector shows resilience and strong commitment to achieve their missions and goals, whilst also operating in complex contexts.

In response to the assessments, findings, and key trends identified by the CSO Meter 2024 that affect civil society in the EaP region, the following key priorities are set out to guide governments, EU institutions, donors in strengthening the civil society environment:

Security, civic freedoms and ceasing all forms of repression

The EU and the international community should continue to advocate for ensuring secure space, civic freedoms and ceasing of all forms of repression against civil society in the relevant countries and:

- Release political prisoners and terminate all politically-motivated criminal cases and investigations against CSO activists, journalists, and human rights defenders.
- Repeal all discriminatory and stigmatising legislation restricting the freedoms of expression and association for CSOs, media representatives, and vulnerable groups.
- Stop the forced termination of CSOs in Belarus.

Stability and survival of civil society

- Provide emergency funding for CSOs working on strengthening and promoting democracy, monitoring and advocating for freedoms, rights and supportive environments.
- Simplify operational and reporting requirements (remove any co-funding requirements and increase the ceiling for indirect costs) and support the groups experiencing the biggest challenges (for instance, those working in exile).
- Where possible, support organisations and states to invest in philanthropy infrastructure and resource mobilisation.
- Support organisations and institutions to work with banks and other financial institutions (for instance, the European Banking Authority) to limit de-risking and ensure that AML/CTF rules do not impact the work of CSOs.
- Ensure financial support for CSOs by preparing to identify new threats and taking action to promote an enabling environment.

- Ensure long-term financial support and core funding to safeguard an enabling environment for civil society through monitoring and advocacy in the EaP region under the new Multiannual Financial Framework.

Security in the EaP region via sustainability of partnerships and dialogue with civil society

- Devise sustainable mechanisms for partnership with civil society in the region to deliver the goals of the EU (security, prosperity, tackling interference).
- Sustain support for an enabling environment for civil society and facilitate dialogue between state authorities, CSOs and other stakeholders depending on the key priorities in a country (identified via the evidence provided in the CSO Meter country reports).
- Support EU-wide solidarity building for civil society in the EaP region and ensure knowledge exchange.

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Annex 1. Regional scores 2024

AREA

Country	1	2	3	4	5	6	7	8	9	10	11	Average
Armenia	5.7	4.9	5.3	5.2	4.9	4.8	4.9	4.5	4.1	4.0	4.5	4.8
Azerbaijan	3.7	3.4	2.8	3.4	4.3	3.4	4.1	4.0	3.9	3.8	4.2	3.7
Belarus	2.3	2.7	2.2	1.5	2.6	1.8	2.4	1.9	2.4	2.3	2.1	2.2
Georgia	5.4	4.7	4.1	2.9	4.3	4.2	3.4	3.8	4.1	2.8	4.7	4.0
Moldova	5.5	4.7	5.3	5.3	5.0	5.0	4.3	4.6	4.4	4.3	4.3	4.8
Ukraine	5.6	5.3	4.7	4.7	4.8	4.9	4.1	3.7	4.4	5.3	4.8	4.7
Average	4.7	4.3	4.1	3.9	4.3	4.0	3.9	3.8	3.9	3.8	4.1	4.0

LEGISLATION

Country	1	2	3	4	5	6	7	8	9	10	11	Average
Armenia	5.8	5.0	5.8	5.7	5.4	5.2	5.8	5.2	4.3	4.3	4.9	5.2
Azerbaijan	4.3	3.8	3.0	4.0	5.0	4.2	4.6	4.5	4.0	4.1	4.5	4.2
Belarus	2.8	3.1	2.6	1.9	3.1	2.4	3.3	2.5	2.8	2.7	2.6	2.7
Georgia	5.2	4.1	4.3	3.1	5.3	4.7	4.0	4.4	4.4	3.1	5.1	4.3
Moldova	5.6	4.8	5.7	5.5	5.4	5.4	5.2	5.0	4.7	4.6	4.5	5.1
Ukraine	5.6	5.4	5.0	4.9	5.2	5.5	4.9	4.0	4.7	5.7	5.1	5.1
Average	4.9	4.4	4.4	4.2	4.9	4.6	4.6	4.3	4.2	4.1	4.5	4.4

PRACTICE

Country	1	2	3	4	5	6	7	8	9	10	11	Average
Armenia	5.6	4.8	4.8	4.7	4.3	4.3	3.9	3.8	3.9	3.6	4.0	4.3
Azerbaijan	3.0	3.0	2.5	2.8	3.5	2.5	3.5	3.5	3.7	3.5	3.9	3.2
Belarus	1.7	2.2	1.8	1.1	2.1	1.2	1.5	1.2	1.9	1.9	1.5	1.6
Georgia	5.5	5.3	3.8	2.7	3.3	3.6	2.8	3.2	3.7	2.5	4.3	3.7

Moldova	5.3	4.5	4.8	5.0	4.5	4.6	3.4	4.2	4.0	4.0	4.1	4.4
Ukraine	5.5	5.1	4.4	4.5	4.3	4.2	3.2	3.4	4.0	4.8	4.4	4.3
Average	4.4	4.2	3.7	3.5	3.7	3.4	3.1	3.2	3.5	3.4	3.7	3.6

Legend:

- I Freedom of Association
- 2 Equal Treatment
- 3 Access to Funding
- 4 Freedom of Peaceful Assembly
- 5 Right to Participation in Decision-Making
- 6 Freedom of Expression
- 7 Right to Privacy
- 8 State Duty to Protect
- 9 State Support
- IO State-CSO Cooperation
- II Digital Rights

