



Funded by
the European Union



csometer



European Center for
Not-for-Profit Law

CSO Meter: Trends and signals in the Eastern Partnership civil society environment (January – September 2025)

As part of the [CSO Meter project](#), ECNL and our partners in the Eastern Partnership (EaP) region monitor how laws and practices affect civic freedoms. The CSO Meter [tool](#) is based on international and European standards and practices and has been shaped through the contributions of hundreds of CSOs across the region, who have supported both its development and the preparation of annual country reports (since 2019). We also maintain an [early warning mechanism](#) to ensure that the European Commission and other interested stakeholders are kept up to date with meaningful analyses of developments related to the civil society environment (in the respective countries and regionally).

In this overview, we outline key trends, concerns and promising developments in the civil society environment across the EaP region in the period from January - September 2025 mainly based on the [early warning system](#) under the CSO Meter.

Key trends:

► **I. Continued repression and criminalisation.** Authoritarian regimes have intensified crackdowns on civil society through legal restrictions, smear campaigns and criminal prosecution. The situation is particularly dire with legal and financial barriers forcing many CSOs to close or operate from exile. In 2025, civil society in Georgia faced unprecedented assault led by the Georgian Dream (GD) party through repressive laws [targeting foreign influence](#) and grant approval. Namely the Law on Transparency of Foreign Influence and Foreign Agents Registration Act (FARA) and the [Law on Grants](#) have been used to criminalise activists, discredit independent CSOs and restrict rights-based work. Amendments to [protest laws](#) increased penalties and expanded grounds for detention. In practice, participants of mass protests disputing the October 2024 election outcome faced excessive police force, [torture](#), arbitrary arrests and unfair trials leading to [prison sentences](#). Also, in a package of amendments to 14 laws, the Georgian Dream Parliament removed the requirement for CSO [participation in policymaking](#), which

contradicts international standards. Further, GD significantly and unduly, restricted freedom of expression and media operation through [various legislative amendments](#), notably in the Law on Broadcasting, introducing [a ban on foreign funding for media](#). In addition, GD adopted a legislative package, removing the terms “[gender](#)” and “gender identity” from 16 different laws, worsening the protection of rights for people of different genders, and restricting the work of organisations protecting vulnerable groups. GD also [announced](#) and [created](#) a government-controlled state fund for CSOs, to support groups aligned with the ruling party, deepening concerns about shrinking civic space. Up to 30 independent and critical CSOs face waves of investigations launched both by the [Anticorruption Bureau \(ACB\)](#) and the [Prosecutors office](#), and several organisations had their bank accounts [frozen](#). In [Belarus](#), the government expanded the list of crimes categorized as [extremist](#) activity, adding criminal convictions for violating procedures in receiving foreign aid. These persons face significant restrictions on their civil legal capacity, in addition to potential criminal punishment. These restrictions remain in place even after the fulfilment of the sentence. Also in Belarus, a [draft law](#) set to punish information on LGBTIQ, childlessness and gender transition was submitted to parliament in July and is likely to pass, expanding the regime’s arsenal of repressive measures and restrictions on freedom of speech. they introduced a ban on foreign funding for media. In addition, GD adopted a legislative package, removing the terms “[gender](#)” and “gender identity” from 16 different laws, worsening the protection of rights for people of different genders, and restricting the work of organisations protecting vulnerable groups. GD also [announced](#) and [created](#) a government-controlled state fund for CSOs, to support groups aligned with the ruling party, deepening concerns about shrinking civic space. Up to 30 independent and critical CSOs face waves of investigations launched both by the [Anticorruption Bureau \(ACB\)](#) and the [Prosecutors office](#), and several organisations had their bank accounts [frozen](#). In [Belarus](#), the government expanded the list of crimes categorized as [extremist](#) activity, adding criminal convictions for violating procedures in receiving foreign aid. These persons face significant restrictions on their civil legal capacity, in addition to potential criminal punishment. These restrictions remain in place even after the fulfilment of the sentence. Also in Belarus, a [draft law](#) set to punish information on LGBTIQ, childlessness and gender transition was submitted to parliament in July and is likely to pass, expanding the regime’s arsenal of repressive measures and restrictions on freedom of speech.

► **2. Access to funding continues to decline amid restrictions.** CSOs across the region continue to face severe funding challenges. Restrictive laws in Belarus, Azerbaijan, and Georgia limit access to international support, cash and anonymous donations. In [Georgia](#), the FARA law imposed criminal liability on individuals and organisations receiving foreign funds without state approval, creating a climate of fear and forcing

many CSOs and donors to scale back or suspend operations. For years, civil society in Belarus and Azerbaijan face severe restrictions on both foreign and domestic funding, with novel requirements in Azerbaijan mandating state pre-approval for any foreign aid received. In July 2025, Azerbaijan amended the Law on NGOs and the Code of Administrative Offences to tighten control over foreign-funded service contracts, prohibiting banks from processing unregistered transactions and introducing for the first time, significant fines for both CSO leaders and organisations that fail to register their foreign funded activities, or accept financial or material resources without service contracts (ranging from 780 to 7,800 euros), targeting CSOs, their staff and financial intermediaries. Also, amendments to the Media Law in Azerbaijan require foreign media entities to register with the Media Development Agency within seven days of establishing operations, with non-compliance leading to deregistration and fines under existing administrative law. In Armenia, Moldova, and Ukraine, state funding and domestic philanthropy remain weak. The termination of USAID operations and funding has had a devastating impact, with some CSOs fully closing operations, others losing up to 90% of their funding, and with that significantly reducing their operations and number staff. Civil society groups emphasise the need for core funding to be able to flexibly react to accelerating restrictions.

- **3. Public participation efforts are advancing.** Despite legal and practical restrictions on public participation in some countries (for example in Georgia, as noted above), several other countries noted progress in strengthening civil society participation. Armenia established a new department on Participatory and Open Government within the Prime Minister's Office, aiming to address long-standing gaps in state-CSO cooperation. In Moldova, the government began reviewing legislation to improve transparency and accountability, in a multistakeholder working group tackling key participation barriers. Ukraine saw major legislative advances, including a law signed in January that modernises civic engagement in local governance, and another expanding media freedoms and civil society access to parliamentary processes, both seen as crucial for democratic resilience under martial law.

Critical concerns:

- **I. Civil society and activists are imprisoned, exiled or facing severe threats due to escalating restrictions.** Across the region, civil society representatives and activists have relocated to exile or navigate legal uncertainty inside their country, risking imprisonment and fines for practicing their basic freedoms and rights. Georgian civil society faces collapse under rising authoritarianism, and continues to operate, albeit in extremely challenging conditions. According to Belarusian human rights CSOs, the total number of political prisoners in Belarus is around 1,200 and is decreasing very slowly. Despite the release of some political prisoners, including civil society activists, through pardons or the end of their sentences, new arrests and criminal convictions for expressing opinions are issued by courts. The released political prisoners are pressured to leave Belarus. For Belarusian civil society, repression extends beyond borders into transnational repression, as authorities continue to exert pressure on activists and representatives of civil society who have been forced to remain abroad. In Azerbaijan, there is a [growing list](#) of journalists and activists who are imprisoned and increasing number of those that relocate to other countries. For those that remain inside, the space is further reduced for [any](#) independent civil society engagement and work. Civil society is in grave danger, underfunded and needs comprehensive support.
- **2. Elections drive foreign agent laws, internet blocking and assembly restrictions.** With the upcoming Moldovan election in September 2025, the parliament opposition introduced a [draft "foreign agents" law](#) in March 2025 to label organisations receiving foreign funding, raising fears of stigmatisation and restrictions ahead of elections. The law includes vague definition and criteria on foreign agents, heavy reporting burdens, and sanctions aimed at silencing independent voices and shrinking civic space. Also, in the context of elections, two additional proposals are relevant. Firstly, a proposal to [fine online disinformation](#) risks infringing on free expression due to unclear terms and potential overreach. Secondly, a [draft law on public events](#), intended to complement regulation on freedom of peaceful assembly, it introduces more restrictive procedures and obligations for public events, posing a significant threat to the freedom of assembly.. Also in Moldova, multiple political figures, pushed for restrictions on CSOs, including proposing stricter CSO funding rules and a proposed ban on 'LGBT propaganda'. In 2025, both Belarus and Azerbaijan held elections in contexts marked by severe restrictions on freedoms and weakened opposition forces. Belarus's presidential election on January 26 was marked by [internet censorship](#), VPN blocking, and a crackdown on dissent. It culminated in Lukashenko securing a seventh consecutive term in a demonstrably unfree and unfair election with over 86% of the vote amid the absence of legal opposition parties and the imprisonment of political prisoners (including Nobel laureate Ales Bialiatski) or

exile of opposition figures. Similarly, Azerbaijan's municipal [elections](#) on January 29, followed early [presidential](#) and [parliamentary](#) elections criticised by the OSCE for lacking genuine political alternatives and taking place in a tightly controlled environment. In Armenia, civil society is concerned about the increasing influence from politicised and pro-Kremlin actors ahead of the 2026 parliamentary elections, with anti-democratic forces exploiting public sentiments to erode trust in the democratic institutions. At the same time, in the context of high public polarisation, CSOs face growing pressure and politicised labelling both for voicing criticism and for engaging in collaborative initiatives with the government. Georgian local elections in October 2025 are anticipated to bring further repression of civil society, in an environment of imprisoned opposition political figures, and failure to secure presence of independent election monitoring missions.

► **3. Targeting civil society under the guise of combating extremism, terrorism, corruption and money laundering.** With regards to misuse of anti-corruption measures, Ukrainians strongly opposed a [controversial draft law](#) and succeeded in having it withdrawn. The proposal would have weakened the independence of key anti-corruption agencies by placing them under the direct authority of the politically appointed Prosecutor General. The draft law sparked protests alongside criticism from the G7, European Commission and civil society as it would have affected Ukraine's anti-corruption efforts amid its EU integration goals. Meanwhile, in Georgia, the Georgian Dream continues to [abuse](#) the Anti-Corruption Bureau to persecute civil society, in violation of international law. With regard to anti-money laundering/counter-terrorism financing (AML/CFT) measures, the State Financial Monitoring Service in Ukraine [labelled](#) CSOs as high-risk for AML/CFT based on broad assumptions and lack of evidence, threatening to overregulate vital wartime humanitarian actors. However, as a [CEDEM study](#) found, engagement of volunteers does not actually affect the risk profile of CSOs and charities, as volunteers rarely handle funds and, when they do, proper legal and compliance measures are followed. Further, in Ukraine [AML regulations](#) on ultimate beneficial owners added compliance burdens and penalties, increasing risks for CSOs under war conditions. At the same time, a new law created a vague public list of terrorist groups, raising concerns about [potential misuse to restrict legitimate CSO activities](#), without clear safeguards and limit freedom of association. In Azerbaijan and Belarus, authorities [abuse](#) measures to combat extremism, terrorism, corruption and money laundering and apply extensive financial scrutiny and provide for severe penalties. Belarus exhibits the most serious abuses of these measures serving as main tools of repression, targeting legitimate civil society activity and free expression through widespread criminal prosecution.

► **4. Expanded surveillance.** Armenia's Parliament passed [amendments](#) to the Law on Police in March 2025, framed as a public safety measure, which allow the Ministry of

Internal Affairs (MIA) to access surveillance cameras installed on public buildings, transport and parking areas. In addition, [legislative amendments](#), which took effect in August 2025, allow the MIA to launch a nationwide system of real-time biometric surveillance. The amendments limit the scope of access and include several safeguards to ensure the transparent and accountable use of surveillance systems. However, they provide large discretion for usage of the information, including through face identification in case of “reasonable suspicion of an offense”, as well as introduce a provision allowing municipalities to access surveillance systems in their communities, which lacks clear legal safeguards. Given the absence of proper regulation of artificial intelligence (AI) technologies and public oversight mechanisms, the amended law poses a risk of misuse and infringement to the rights of privacy, freedom of peaceful assembly and non-discrimination principles, guaranteed by Armenia’s Constitution and its international human rights obligations. The expanded surveillance is a trend already noted in our 2024 [report](#) in the remaining countries of the region.

► **5. SLAPPs against environmental activism.** In May 2025, [Armenia’s](#) largest mining company, Zangezur Copper-Molybdenum Combine (ZCMC), [filed a lawsuit](#) against eight former workers who had struck for fair wages and safer conditions, demanding AMD 4.7 billion (10.6 million EUR) in damages and placing liens on their assets. Civil society groups warn this SLAPP-style lawsuit aims to intimidate activists and deter future protests, especially in the mining sector. With the government owning a 21.8% stake in ZCMC, concerns about state complicity have grown. The case threatens workers’ rights and sets a dangerous precedent for silencing dissent, prompting over 25 CSOs and international actors to condemn the suit and [call](#) for its withdrawal. Also in [Moldova](#), a [report](#) published by the Legal Resources Centre from Moldova (LRCM) shows that CSOs have consistently been the target of smear campaigns and SLAPPs.

Promising developments:

- ▶ **1. New laws empowering youth organisations.** Ukraine adopted a new law that [opens](#) diverse funding channels for youth CSOs and introduces long-term institutional support mechanisms. Also, the Armenian Parliament [adopted a new Law on Youth Policy](#), a pivotal step towards empowering young people and recognising them, including youth CSOs as key players in shaping the future of the country.
- ▶ **2. Volunteerism laws.** The Moldovan Parliament passed in first reading a [new](#) law on Volunteering, set to introduce long-awaited reforms to regulate, recognise and support voluntary activities. In Belarus, despite predominantly negative developments, the Standing Committee on Health Care, Physical Education, Family and Youth Policy of the House of Representatives initiated including in the government activity plan in 2026 the development of a similar dedicated law on volunteerism.
- ▶ **3. Public interest litigation.** In Armenia, members of the parliament proposed [legislative amendments](#) to the Law on Public Organisations and the Administrative Procedure Code of Armenia to [expand](#) the ability of CSOs to represent the collective interests of their beneficiaries in court. The changes, taking into account civil society recommendations, will extend CSOs' court standing beyond the current limited scope which includes environmental protection and the rights of persons with disabilities. If adopted, the amendments will allow CSOs to engage in litigation on a wider range of cases concerning protection against discrimination, as well as reduce the requirements for public organisations to apply to court.
- ▶ **4. Protection of Human Rights Defenders and prevention of SLAPPs.** In Moldova, the Ministry of Justice has initiated the procedure to draft legislation, on protection of Human Rights Defenders and to develop an anti-SLAPP framework. The need for such legislation is deemed essential by CSOs, and stems from recent developments that reveal illiberal tendencies among certain political actors who target CSOs, HRDs, and independent media, all of which remain highly vulnerable. The legislative draft on the protection of HRDs builds upon a [concept developed by the Ombudsman](#).
- ▶ **5. Civil society key amidst escalating Russian aggression in Ukraine.** In 2025, despite challenges posed by Russia's full-scale invasion and the constraints of martial law, Ukraine's civil society has continued to improve institutional development and citizen engagement. Key legal and policy advances include the adoption of amendments to the [Law on Social Services](#), which enhance service accessibility and enable CSOs to operate more freely and effectively, particularly in serving vulnerable populations. The government also approved a comprehensive 2025–2026 [Action Plan](#) for Civil Society Development, which promotes public participation, expands digital tools like the Diia

portal for CSO registration, and increases state support for civic initiatives. Also, the Parliament adopted tax reforms that provide fiscal relief to CSOs, volunteers, and charitable organisations, allowing them to function more flexibly under martial law.

Broader civil society context:

The EaP region is experiencing a rapidly worsening and deepening crisis marked by an expanding wave of authoritarian repression in Georgia, Belarus, and Azerbaijan, an ongoing Russian aggression in Ukraine, and numerous political, social, and security challenges. Throughout these crises, civil society is a vital lifeline in protecting people in emergencies, delivering essential services, holding governments accountable, and advocating for justice and fairness. Since the beginning of 2025, civil society confronted the dismantling of the USAID agency, losing vital funding and broader partnership infrastructure and support. This was followed by many countries across the world shifting their spending towards defence, leaving democracy protection efforts in EaP critically underfunded.

EU remains to be the main supporter of civil society in the region. [Ukraine](#)'s EU accession progress faced challenges due to democratic backsliding around anti-corruption reforms, civil society mobilised and [succeeded](#) to protect the integrity of anti-corruption institutions. The relationship between Georgia and the EU further deteriorated as the EU considers re-introducing a visa regime in response to major concerns over democratic backsliding. Moldova is advancing integration efforts through cluster-based screenings and in July 2025 held the [first](#) EU-Moldova summit. As part of their EU accession preparations, [Ukraine](#) and [Moldova](#) have adopted strategic roadmaps addressing rule of law and democratic institutions, including enabling environment for civil society. Armenia has seen a historic citizen-led initiative, after which the National Assembly [passed law](#) to initiate EU accession process, reflecting strong public support for European integration.

Get involved:

We invite you to explore ways to support a resilient civil society:

- Key takeaways from the CSO Meter Civil Society Days 2025 in Brussels: [Stronger together: Why the world needs a resilient civil society in the Eastern Partnership region](#)
- Advice for donors: [Civil society in the Eastern Partnership is Europe's strategic partner: This is how funders can support it](#)
- To find out what improvements has civil society already brought to the region, see the [Stories of Change](#).

Over the coming months, ECNL and the CSO Meter partners will continue to monitor and analyse emerging issues of the CSO environment in the EaP region. To stay informed about the latest developments, see the regular [Updates](#). In early 2025, you will also be able to see the regional and country reports with detailed analysis and updated scores under [Reports](#).

For a quarterly overview of all relevant updates, sign up for the [CSO Meter Roundup](#)!