



Executive summary

1. Context: a rapidly changing civic space environment

CIVIL SOCIETY is operating in an increasingly constrained and complex global environment. Across regions, organisations face a combination of restrictive laws, administrative burdens, shrinking and more conditional funding, digital surveillance and harassment, as well as increasing public narratives that question civil society's legitimacy. At the same time, the development cooperation landscape is undergoing significant change. Aid budgets are under pressure, geopolitical priorities are shifting, and development finance is increasingly shaped by security agendas, private sector engagement, and multilateral restructuring. These dynamics are directly affecting the space in which civil society operates.

In this context, the OECD-DAC Recommendation on Enabling Civil Society (2021) is more relevant now than ever. The five-year review provides an important basis for the next phase of implementation: moving from broad commitments to more practical action that strengthens civil society's ability to operate safely, independently and effectively.

This report offers a Forus perspective grounded in the network's own experience, gathered through eight Thinking Rooms with members across Africa, Asia, the Pacific, Latin America, the MENA region and Europe; a multilingual member survey; and a final workshop. It also draws on existing monitoring data, including from the EU System for an Enabling Environment for Civil Society (EU SEE) from across 86 countries and wider civil society evidence assembled for the OECD-DAC five-year review.

It explores how civil society has experienced the implementation of the three pillars of the Recommendation and situates this in the broader civic space context they face. The evidence is organised according to the six interrelated enabling-environment dimensions: fundamental freedoms; legal and regulatory frameworks; resources and funding; an open and responsive state; public discourse and narratives; and a secure digital environment.

2. Key findings from the research



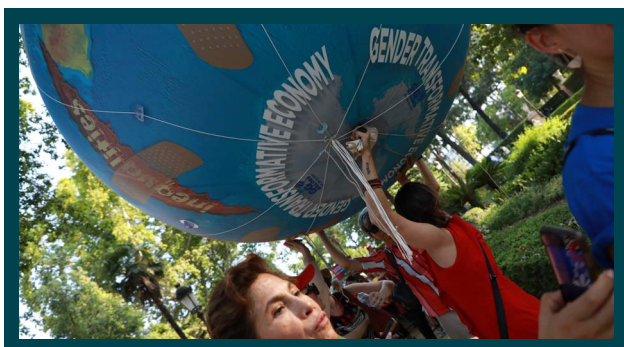
CIVIL SOCIETY RESTRICTIONS ARE CUMULATIVE, MULTI-DIMENSIONAL AND INTERCONNECTED.

Legal and administrative constraints, funding pressures, digital repression, and delegitimising narratives increasingly reinforce each other, producing a cumulative shrinking of civic space even where formal rights remain in place.



ENABLING ENVIRONMENT RISKS ARE OFTEN INDIRECT AND UNDER-RECOGNISED.

A significant proportion of restrictions arise through “grey-zone” measures such as registration requirements, foreign funding controls, counter-terrorism and anti-money laundering rules, tax and reporting obligations, and digital governance regulations. These are often treated as technical issues despite their cumulative impact on civic space.



FUNDING SHOCKS ARE NOW A STRUCTURAL CIVIC SPACE RISK.

Recent abrupt funding reductions, including the 2025 freeze of US assistance, have had severe consequences. 67% of surveyed CSOs reported direct impact, and 40% lost between a quarter and half of their budgets¹. Human rights and democracy organisations were most affected. These shocks transfer risk to local actors and weaken institutional capacity.



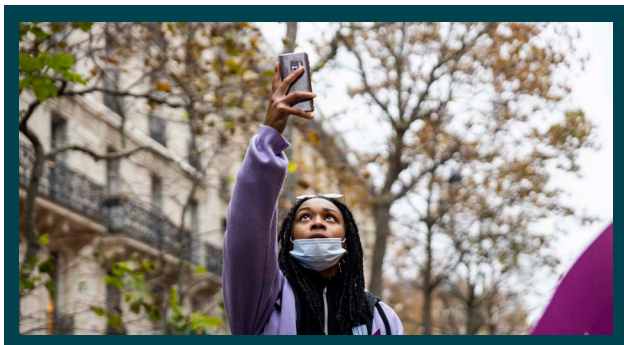
EARLY WARNING SYSTEMS MAKE A DIFFERENCE.

The evidence gathered through early warning systems that have been created in several countries has already had a concrete impact by enabling CSOs to prepare for and mitigate oncoming restrictions by anticipating impact of legislation and preparing for it, by accessing information to mitigate or secure adjustments to laws and policies, before they are implemented.

¹ **Source:** <https://eusee.hivos.org/document/the-impact-of-the-us-funding-freeze-on-civil-society/>

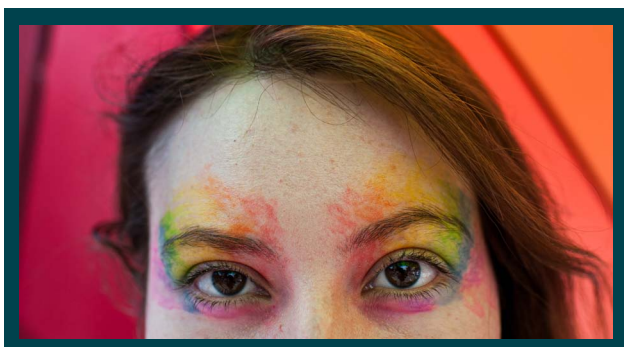
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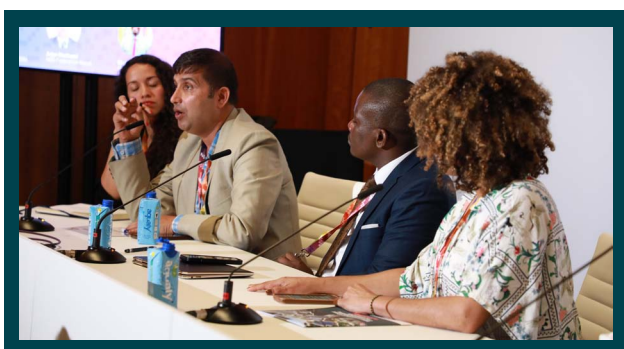
THE DIGITAL ENVIRONMENT IS A FRONTLINE CIVIC SPACE ARENA.

Surveillance, internet shutdowns, platform restrictions, and misuse of cyber and online safety laws are increasingly deployed to constrain civic space, while policy responses remain fragmented and slow.



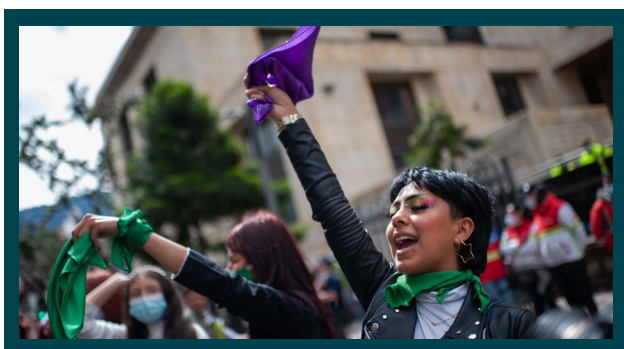
DELEGITIMISING NARRATIVES ARE A GROWING STRUCTURAL CONSTRAINT.

Public attacks and misinformation campaigns are frequently used to undermine civil society legitimacy and prepare the ground for formal restrictions.



THE CENTRAL GAP IS BETWEEN COMMITMENT TO AND IMPLEMENTATION OF THE OECD DAC RECOMMENDATION.

Across all three pillars, civil society recognises policy commitments but reports uneven and often insufficient implementation. Monitoring systems, early action mechanisms, and policy coherence remain underdeveloped.



IMPACTS ARE UNEVEN ACROSS ACTORS.

Women-led, youth-led, Indigenous, disability-led, LGBTQIA+ and grassroots organisations, as well as human rights defenders, environmental actors, and independent media, face disproportionate risk and reduced access to support.

3. Implications of the findings for the DAC Recommendation

For the DAC Recommendation to fulfil its potential to enable civil society it must **move from policy commitment to implementation capability**. The key challenge is no longer the absence of policy frameworks, but the lack of operational mechanisms to translate commitments into coordinated action. This means **using early warning systems that are linked to coordinated early action**, response protocols, and systematic monitoring of civic space risks. It also includes **resourcing civil society adequately**, despite the funding shocks of the recent period. **Digital repression needs to be recognised as a core civic space issue** as technology has been shown to be an accelerator of restrictions on civil society.

Civic space cannot be assessed solely through the existence of formal rights or assessments of a single theme. DAC members need to systematically assess the combined impact of legal, financial, digital, and

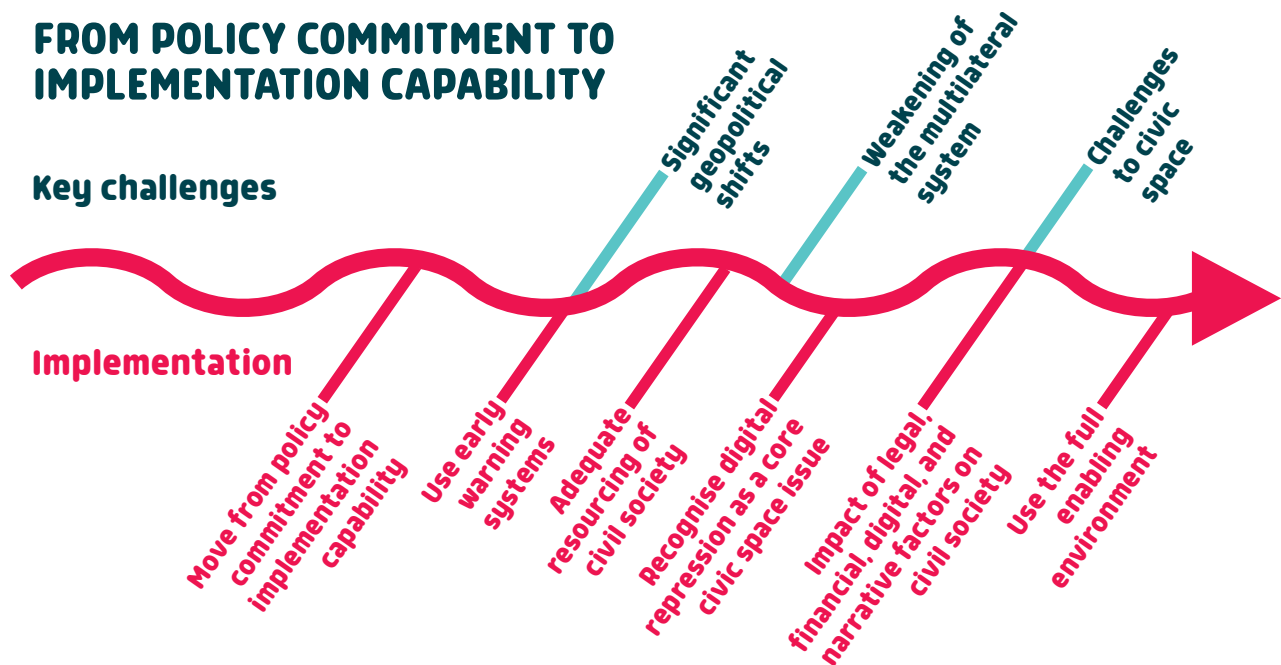
narrative factors on civil society's ability to operate. The full **enabling environment lens** provides an effective framework to use.

It is critical that DAC members do not withdraw support for enabling civil society at a time of significant geopolitical shifts, weakening of the multilateral system and challenges to civic space. DAC members must continue to engage in this agenda or they risk impacting their existing commitments and values to pluralistic society.

"DAC members need to systematically assess the combined impact of legal, financial, digital, and narrative factors on civil society's ability to operate."

FROM POLICY COMMITMENT TO IMPLEMENTATION CAPABILITY

Key challenges



4. Priority areas for DAC action

Based on the evidence, seven priority areas emerge for strengthening the implementation of the Recommendation:

1. ADOPT AN ENABLING ENVIRONMENT LENS TO ASSESS IMPACT.



Implementation should be assessed based on whether civil society can operate safely, independently, and effectively, not on whether policies exist. The six-dimensional framework should be embedded in monitoring and decision-making systems.

2. ACT EARLIER AND IN A COORDINATED FASHION.



DAC members should establish early-warning-to-early-action mechanisms with clear triggers and coordinated responses within defined timelines, supported by embassy mandates, joint démarche, quiet diplomacy, emergency legal and protection support, and accelerated or flexible grants.

3. RESOURCE CIVIL SOCIETY TO SUSTAIN INDEPENDENT AND COLLECTIVE ACTION.



Resourcing is part of civic-space protection: protect core funding, make advocacy fundable, and do no harm in transitions. Funding systems should prioritise predictable, flexible, multi-year core support, reduce administrative burden, and ensure equitable access for local actors while avoiding risk transfer.

4. TREAT THE DIGITAL ENVIRONMENT AND DIGITAL REPRESSION AS A CORE CIVIC SPACE ISSUE.



Digital threats should be integrated across all pillars, with stronger responses to surveillance, shutdowns, platform restrictions, and misuse of cyber laws.

5. SUPPORT PUBLIC DISCOURSE AND NARRATIVES THAT PROTECT CIVIL SOCIETY.



DAC members should support positive narratives on civil society and respond to disinformation and smear campaigns that undermine civic space.

6. MEASURE PARTICIPATION BY INFLUENCE, NOT ATTENDANCE.



Participation should be assessed based on influence and feedback loops, not attendance. Civil society input should demonstrably inform policy and funding decisions.

7. STRENGTHEN WHOLE-OF-GOVERNMENT POLICY COHERENCE.



Civic space commitments must be integrated across development, foreign affairs, trade, security, migration, and digital policy to avoid contradictory impacts.

5. Conclusion

THE OECD-DAC Recommendation on Enabling Civil Society is more relevant now than ever. However, the evidence clearly shows a gap between policy commitments and implementation in practice.



The five-year review provides an important basis for the next phase: ensuring that DAC members are not only committed

to enabling civil society in principle, but are equipped to do so in practice in an increasingly complex global environment.

STRENGTHENING THE RECOMMENDATION REQUIRES A SHIFT TOWARD:



GREATER OPERATIONAL IMPLEMENTATION CAPACITY



EARLIER AND MORE COORDINATED RESPONSES TO CIVIC SPACE DETERIORATION



ADOPTING THE 6 DIMENSIONS OF THE ENABLING ENVIRONMENT FRAMEWORK TO UNDERSTAND IMPACT AND RECOGNISE THE INDIRECT AND SYSTEMIC RESTRICTIONS



STRONGER COHERENCE ACROSS DEVELOPMENT, DIPLOMATIC, AND FINANCIAL SYSTEMS





1. Introduction

THIS FORUS report presents **evidence and priorities for action to strengthen the enabling environment for civil society**. It offers a civil society perspective alongside the OECD-DAC five-year review of the implementation of the OECD-DAC Recommendation on Enabling Civil Society. It asks how the enabling environment is changing, how civil society is experiencing implementation of the Recommendation, and what this means for DAC members going forward. The report is written for Forus members and other civil society stakeholders, **to support engagement with OECD-DAC members and other actors that shape civil society's operating environment**. The report and executive summary are also intended to support policy makers in acting on the five-year review and strengthening the next phase of implementation of the Recommendation.

Since 2021, civil society's operating environment has become more constrained in most countries and regions. Restrictions are not limited to direct attacks on freedom of association, assembly and expression; they also take place through legal and administrative pressure, shrinking resources, hostile narratives, digital repression and risk-averse donor practices. Formal rights may remain in place, while the actual ability to organise, speak, advocate and participate becomes harder. The OECD-DAC's five-year review of the Recommendation has taken stock of the first phase of its implementation and provides an important basis for asking what needs to change so that the Recommendation remains useful in a deteriorating global context. This changed context underscores both the importance of the five-year review and the need to act on it.

This changed context makes the review of the OECD DAC Recommendation all the more timely and critical. As a global network of national NGO platforms and regional coalitions, Forus brings an important perspective to this debate as it can show how civil society organisations experience and navigate these contextual changes. Its members are well placed to identify how international commitments are experienced at country and regional level, and what DAC members need to do differently to support an enabling environment for civil society.

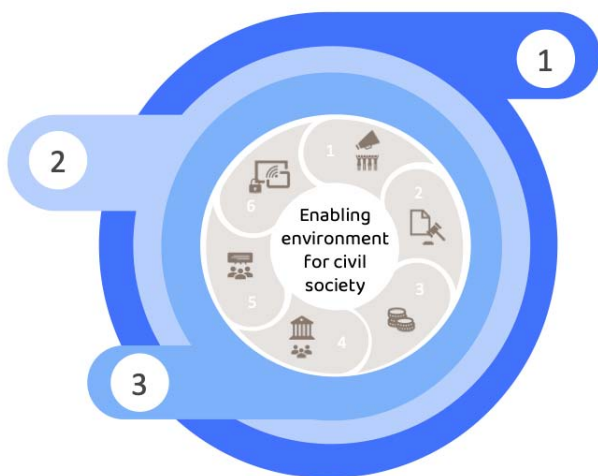
- 1.** The report's **Section 1** briefly introduces the OECD DAC Recommendation on Enabling Civil Society, the Enabling Environment Framework that is used in the analysis, and provides a short methodological note on the research.
- 2.** **Section 2** outlines the **key changes in context** since 2021 that need to be taken into account when assessing the Recommendation's impact and looking towards the future.
- 3.** **Section 3** examines **what civil society is experiencing**, in terms of the implementation of the Recommendation and then places that experience within the wider enabling environment.
- 4.** **Section 4** sets out **recommendations for DAC members moving forward**.

The OECD DAC Recommendation on Enabling Civil Society

The OECD DAC Recommendation on Enabling Civil Society is the **first international standard** acknowledging the need to protect civic space and support local actors in international cooperation and humanitarian aid. Its launch in 2021 marked an important milestone in the recognition of **the need for DAC members, or ‘providers’ to actively protect civic space and civil society actors** as independent actors in society, not just as implementing partners in humanitarian and development initiatives. As such it is an important resource for civil society, DAC members and other development actors.

The Recommendation sets out commitments across three connected pillars. These are:

1. **Respecting, protecting and promoting civic space;**
2. **Supporting and engaging with civil society; and**
3. **Incentivising civil society organisation effectiveness, transparency and accountability.**

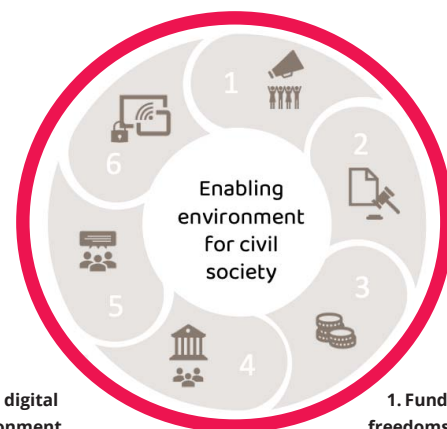


Together, these pillars provide a useful international standard for how development cooperation and humanitarian assistance should help protect and enable civil society.

The Enabling Environment framework

This analysis uses a broad enabling environment framework with six connected dimensions: (1) fundamental freedoms; (2) legal and regulatory frameworks; (3) resources and funding conditions; (4) an open and responsive state; (5) public discourse and narratives; and (6) a secure digital environment. These dimensions are read together with the three pillars of the OECD-DAC Recommendation. This wider lens is essential because restrictions rarely appear in one area alone, and they reinforce each other. A hostile public narrative can prepare the ground for a restrictive law. A funding cut can weaken an organisation’s ability to challenge power. A registration delay can block access to both donor funding and participation spaces. A cybercrime law can limit expression, association and participation at the same time.

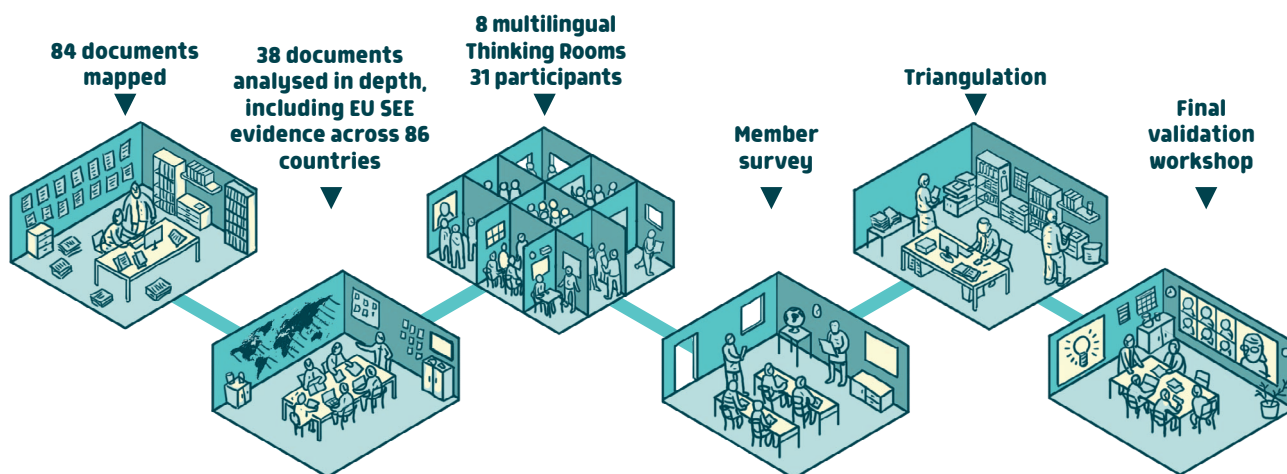
See Annex 1 for further detail on the Enabling Environment Framework



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| <p>6. Secure digital environment
(Safe digital access, without the threat of censorship, surveillance, or disinformation)</p> <p>5. Public discourse and narratives
(Supportive and positive public culture that acknowledges civic engagement and recognises the contributions of CSOs)</p> <p>4. Open and responsive state
(Constructive, democratic relationship where public authorities are transparent, accountable, and actively include civil society)</p> | <p>1. Fundamental freedoms
(Association, peaceful assembly, expression, protection of defenders)</p> <p>2. Legal and regulatory frameworks
(NGO laws, registration, foreign funding, taxation, anti money laundering, counter terrorism rules)</p> <p>3. Resources and funding conditions
(Accessible, predictable and sustainable resources and the ability to secure them without administrative red tape)</p> |
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Methodology and evidence note

DESK REVIEW:



This report is based on a staged research process carried out between April and June 2026. The work began with a desk review of existing evidence from Forus, EU SEE, the DAC Civil Society Reference Group and other civil society sources. An initial bibliography of **84 documents** was classified and a subset of **38 documents** was selected for deeper analysis (see list of published sources reviewed in Annex 2). Key sources included **EU SEE monitoring data from across 86 countries**, independent indices such as the CIVICUS Monitor and V-Dem, and civil society submissions and other evidence assembled for the OECD DAC five-year review. Evidence was explored against the six enabling environment dimensions and reviewed with four cross-cutting lenses: regional diversity, levels and forms of restriction, intersectionality, and the role of coordination actors. The six enabling environment dimensions align with the six principles used by the EU SEE's monitoring system, meaning that findings could be mapped consistently across sources. Evidence for how civil society experiences the DAC Recommendation was mapped against the three pillars of the recommendation.

The desk review was complemented by targeted engagement with the Forus network through Thinking Rooms: small group facilitated peer discussions. **Eight Thinking Rooms** were held with **31 participants** drawn from national platforms and regional coalitions across Africa, Asia, the Pacific, Latin America, the MENA region and Europe. The Thinking Rooms were run in English,

French and Spanish, were structured by region and included a dedicated session with the Forus Secretariat. Many participants were EU SEE data-collection leads in their own countries, tying this consultation directly to near-real-time civic space monitoring. The purpose of discussions was to test the resonance of trends emerging from the literature review, deepen their interpretation and define and sharpen policy asks to DAC members. A multilingual **member survey** was then used to test a preliminary advocacy agenda with the network.

The evidence base and findings have been **triangulated** across the literature review, Thinking Room discussions and survey responses. The findings and proposed advocacy agenda were discussed with participants from the Forus network in a **final workshop**, and feedback from this discussion informed this report.

Some limitations relate to the targeted and tightly time-bound nature of the consultation. Given the political sensitivity of the analysis, the report avoids unnecessary identification of individuals or high-risk contexts, using examples carefully. This report deliberately foregrounds how implementation is experienced by civil society and treats CSO-led monitoring and reporting as operational evidence of implementation, not only as context. This complements provider reporting by foregrounding how implementation is experienced by civil society and what changes in practice on the ground.



2. Changing global context

THE OECD-DAC Recommendation was adopted in 2021, and its five-year review was conducted in a markedly more adverse context for civil society. The enabling environment is being shaped by the convergence of democratic regression, aid contraction and disregard of humanitarian and human rights norms. Violent conflict, climate stress and rising economic inequality along with technological disruption and declining public trust are seriously impacting the enabling environment for civil society.

This evolving context makes the Recommendation even more relevant. It also means that implementation needs to become more political, more responsive to risk and more tangible. It is not enough to ask whether DAC members have policies, tools or consultation mechanisms in place, the key question is whether their actions are helping civil society to operate independently, safely, sustainably and with influence in a tougher context.

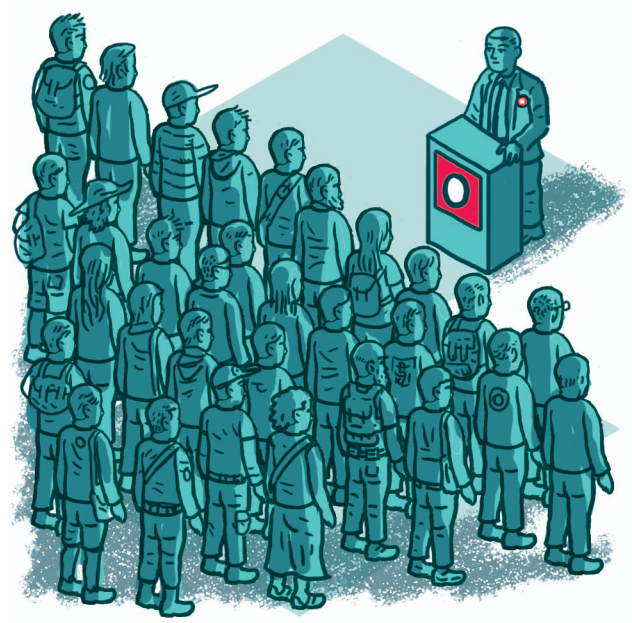
“Violent conflict, climate stress and rising economic inequality along with technological disruption and declining public trust are seriously impacting the enabling environment for civil society.”



Democratic regression and the narrowing of usable rights

Across many contexts, civil society is operating in an environment marked by rising authoritarianism and democratic backsliding. This is visible in overtly authoritarian settings and in countries that continue to hold elections and maintain formal democratic institutions alike. In these contexts, civic space can narrow without a formal rupture: governments may expand executive power, weaken oversight bodies, restrict protest, increase surveillance, or introduce laws that make civil society activity harder in practice. Civil society may still have constitutional rights to associate, assemble and speak, while those rights become increasingly difficult or risky to use.

According to the evidence reviewed, restrictions often intensify during elections, around protests and anti-corruption mobilisation, governance crises, or where latent conflicts around land and other resources exist. Restrictions also often intensify around certain topics, such as rights, gender, migration or climate. DAC members therefore need to look beyond the existence of rights on paper; they need to assess whether civil society can exercise those rights safely and effectively.

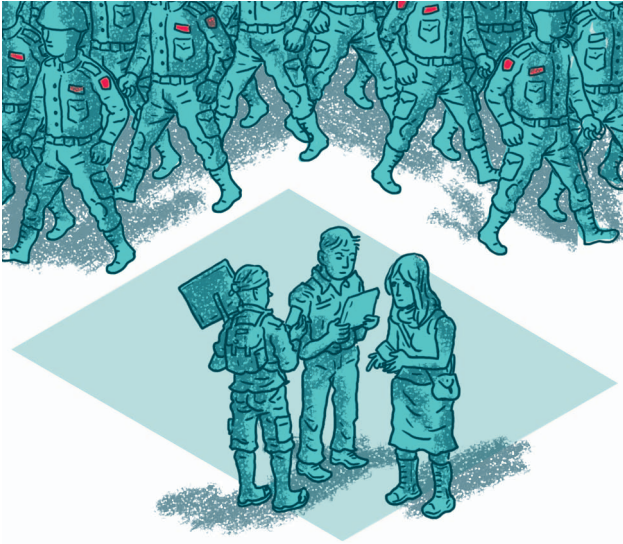


Populism, polarisation and attacks on civil society legitimacy

The rise of populist and anti-pluralist politics is also changing the conditions in which civil society operates with political actors increasingly using “us versus them” narratives to mobilise support. Civil society organisations, independent media, human rights and environmental defenders, feminist movements and organisations working with migrants or marginalised groups are often portrayed as foreign, elitist, partisan, anti-national or disconnected from ordinary people.

These narratives are not only a communications problem, they can create the public acceptance of restrictions that follow. Once civil society is framed as suspicious or illegitimate, restrictive laws, funding controls, administrative harassment and exclusion from policy spaces become easier to justify.

Civil society, on the other hand, also needs to respond to this environment; it cannot assume that its legitimacy is self-evident. Organisations noted that they need to better explain their role, communicate more clearly and in accessible language, show their contribution to communities, and build trust beyond policy and donor audiences.



Securitisation, militarisation and shrinking political space

Security concerns are shaping public policy in many regions. War, conflict and terrorism, along with geopolitical competition for critical resources, and increased defence spending are changing national and international priorities. At the same time, security narratives are increasingly used to justify controls on protest, public debate, digital expression, foreign funding and civil society activity. Security arguments are being used to narrow the space for rights-based work, accountability, peacebuilding, humanitarian access and democratic participation.

This matters for the OECD DAC Recommendation in two ways. First, development and civic space work in particular, is being deprioritised as defence and security spending increase. Second, civil society appears to be treated less as an independent actor and more as a risk to be managed. DAC members will need to ensure that security priorities do not undermine their commitments to protect and enable civil society.

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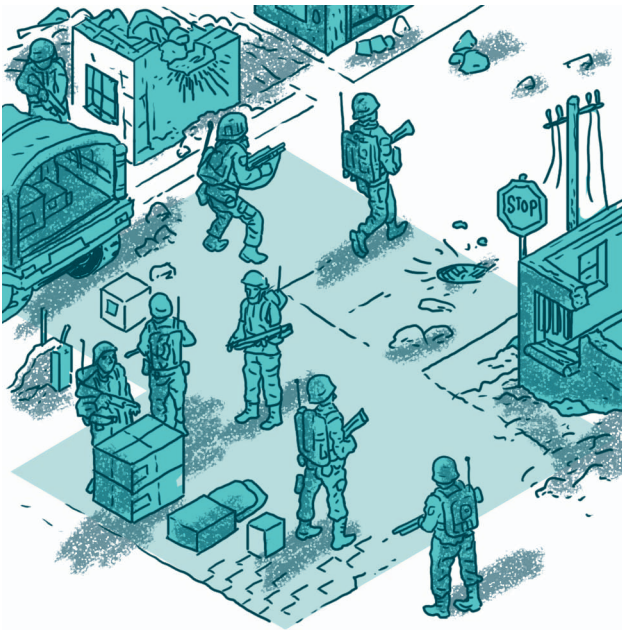
Rupture in the aid and development consensus

The aid and development landscape has changed sharply as major aid cuts, donor exits and reprioritisations have sent severe shocks through civil society ecosystems. The evidence reviewed notes that 26 out of 34 DAC members reduced their ODA contributions in 2025². This is happening at the same time as development cooperation is increasingly framed through donor strategic interests including private capital mobilisation, migration control, security priorities and geopolitical competition.

These shifts directly affect civil society's enabling environment with funding access and quality shaping who survives, who can speak, who can take risks, and which parts of civil society remain visible. When flexible and predictable funding declines, civil society organisations are pushed into survival mode. They may lose staff, reduce advocacy and withdraw from coalitions. In many cases CSOs will then avoid important yet politically sensitive issues or be forced to adapt to donor-safe themes.

The current context also creates risks for localisation. While there is an opportunity to strengthen locally led development and shift power to local actors, localisation can be weakened or co-opted if there is merely a change in the delivery chain. Locally led development requires independent civic agency. This means local civil society must be able to set agendas, access quality funding, organise independently, speak safely, and hold power to account.

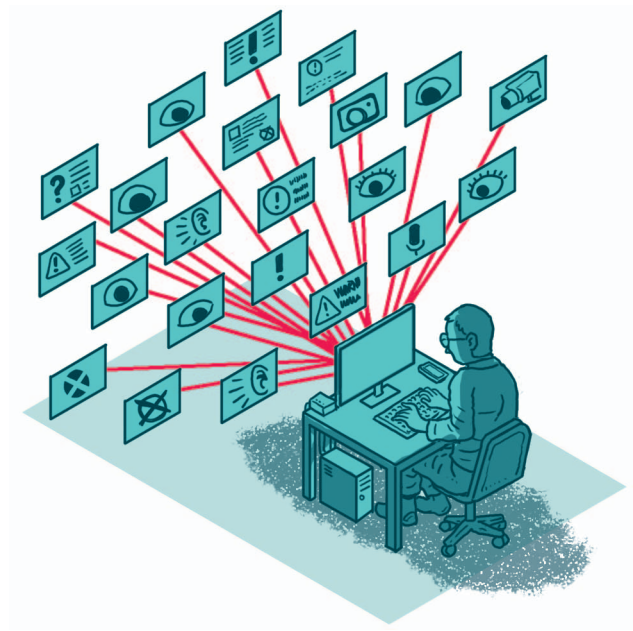
² Source: [https://one.oecd.org/document/DCD\(2026\)8/en/pdf](https://one.oecd.org/document/DCD(2026)8/en/pdf)



Crisis of international humanitarian and human rights norms and architecture

International humanitarian and human rights norms and institutions are under growing strain, further weakening confidence in multilateral systems and contributing to a more selective and unstable international order. Over the past two years, violations of international law, attacks on humanitarian action, restrictions on solidarity, and double standards in international responses have reinforced perceptions that protection, accountability and civic participation are applied inconsistently, and have given greater prominence to 'might is right' approaches to international relations, with a visible escalation in 2026.

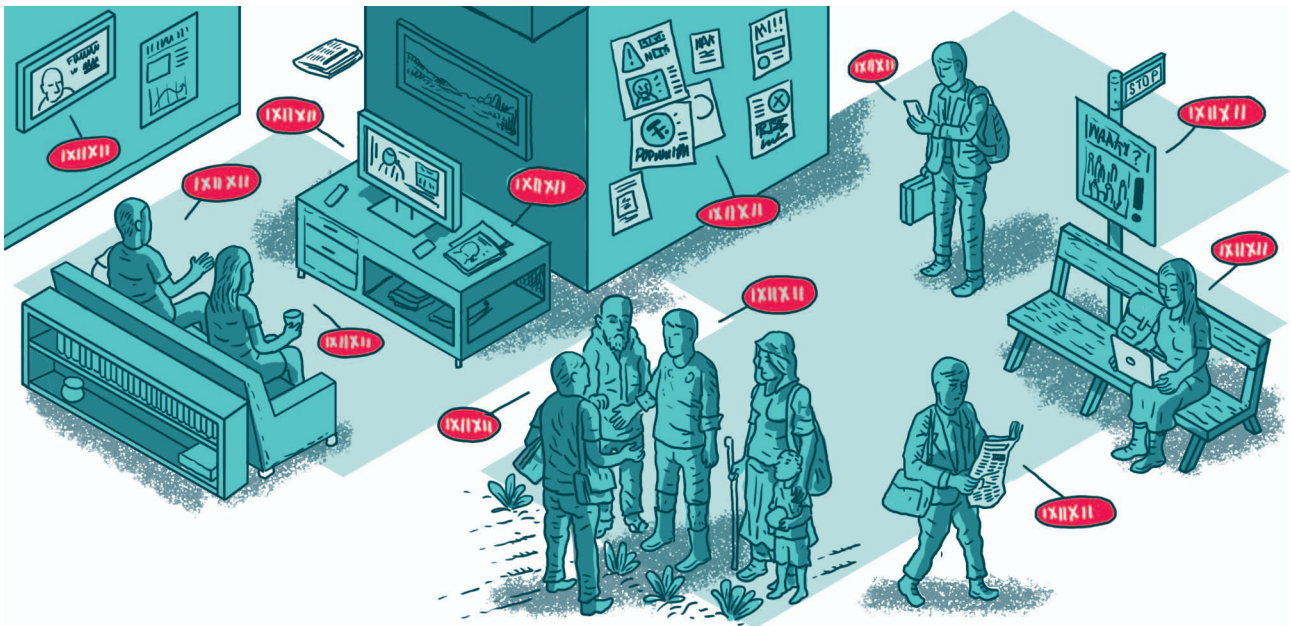
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Digital repression and the transformation of civic space

The digital environment has become central to civic life as civil society now depends on digital tools to organise, mobilise, communicate, to gather evidence or raise funds and to participate in public debate. At the same time, digital repression is expanding through surveillance, internet shutdowns and platform restrictions. Biometric control systems and AI-assisted monitoring and surveillance limit the space for civil society actors to act. Organisations and individuals face online harassment, doxxing and disinformation or smear campaigns, often without proper redress channels from regulators or technology companies.

Digital repression affects more than freedom of expression online; it limits association, assembly, participation, protection and access to resources. A shutdown during an election or protest can prevent organising and monitoring; a cybercrime law can criminalise criticism; online smear campaigns can produce offline threats; and algorithmic amplification can spread hostile narratives faster than civil society can respond. For DAC members, digital governance cannot be treated only as a technical or cybersecurity issue; it is now a core enabling-environment issue.

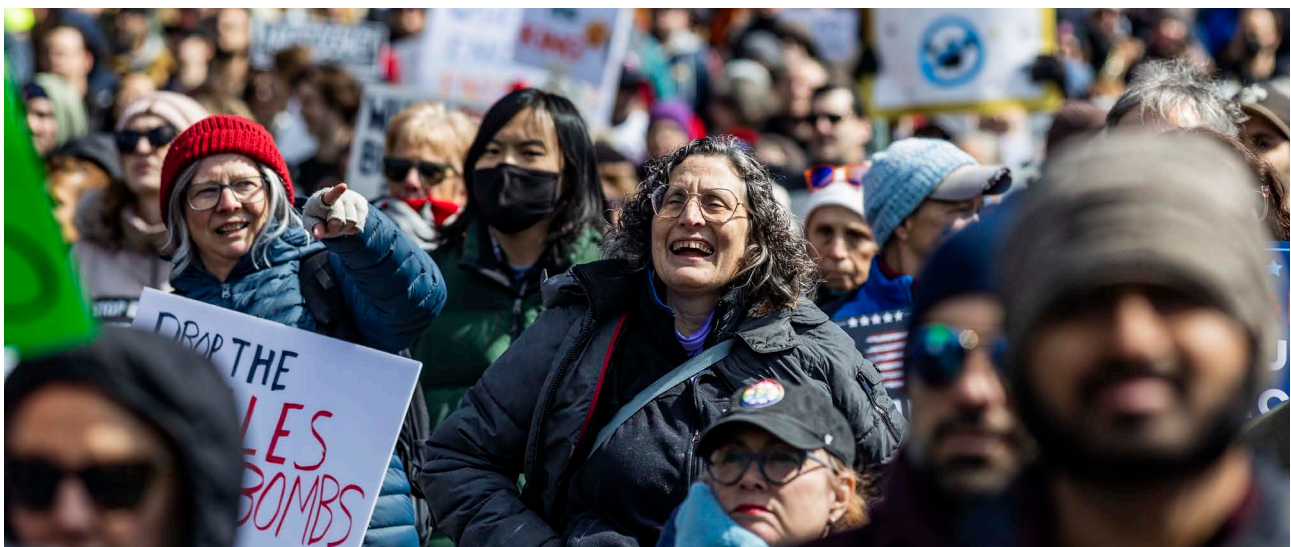


Public narratives and the role of media ecosystems

Disinformation, false narratives, fake news, coordinated smear campaigns, online abuse and information overload contribute to distrust and curtail the enabling environment for civil society. Public narratives are not only background context; they often create the political conditions in which restrictive laws, administrative controls and funding restrictions become acceptable to parts of the public. The changing nature of communication, and the role and responsibility of both 'new' and 'old' media are also central. The distortive role social media's algorithms play in amplifying outrage is well known, yet tech company development continues to maximise profit over responsibility and accountability.

What this means for the next phase of the Recommendation

The main implication is clear: the Recommendation remains highly relevant, more so than before, but its implementation must better respond to today's risks. Civil society is facing restrictions that are indirect, cumulative, and mutually reinforcing: with legal pressure, funding insecurity, hostile narratives, weak participation and digital repression often working together. DAC members therefore need to **use a full enabling-environment lens** to better understand the impact of their interventions and the conditions of civil society.





3. What civil society is experiencing: Implementation of the DAC Recommendation and the wider enabling environment

THIS SECTION looks at civil society's experience. Section 3.1 summarises *how civil society has experienced the implementation of the Recommendation across its three pillars*. Section 3.2 places this experience within the *broader enabling environment*, using the six dimensions lens applied in this report. Section 3.3 draws out the *main implications* for the next phase of implementation by OECD-DAC members.

Civil society evidence points to a clear overall finding: **the OECD-DAC Recommendation is even more relevant now than when adopted in 2021**. As the first international standard recognising the need to protect civic space and support local actors in international cooperation and humanitarian aid, it continues to give civil society, DAC members and other actors a shared framework. It also recognises that civil society

needs more than funding or consultation, it requires an enabling environment in which it can organise, defend rights and hold power to account. However, the **increasing restrictions on civil society's enabling environment** demonstrate that the **potential of the recommendation remains largely unfulfilled**. While DAC members have supported important tools, dialogues and initiatives, it would appear their collective policies and practices have **not managed to keep up with the pace, scale and interconnected nature of restrictions** affecting civil society.

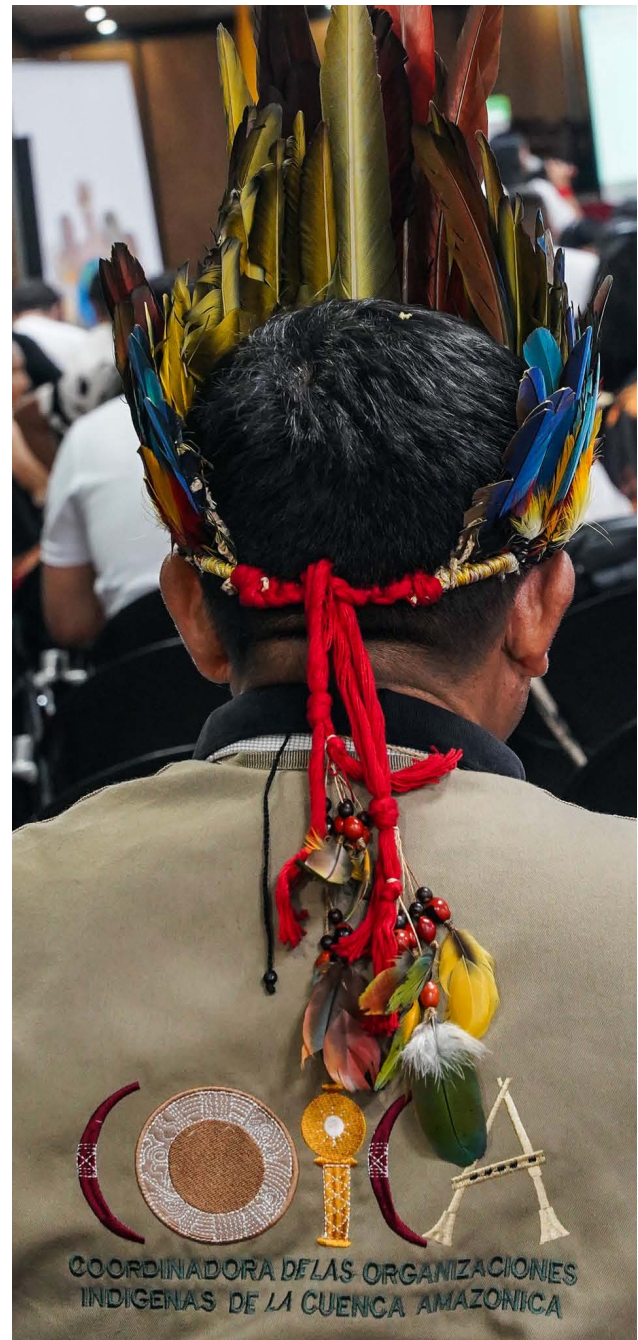
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3.1 How civil society has experienced the Recommendation

Civil society recognises that DAC members have taken positive steps under the Recommendation's guidance. However, the question is whether these steps have changed the conditions under which civil society works. The evidence reviewed suggests that **progress is more visible in policies, tools and consultation mechanisms than in practical protection, quality funding, meaningful influence and risk-sharing.** Nonetheless, implementation has not kept pace with the speed and scale of restrictions affecting civil society.

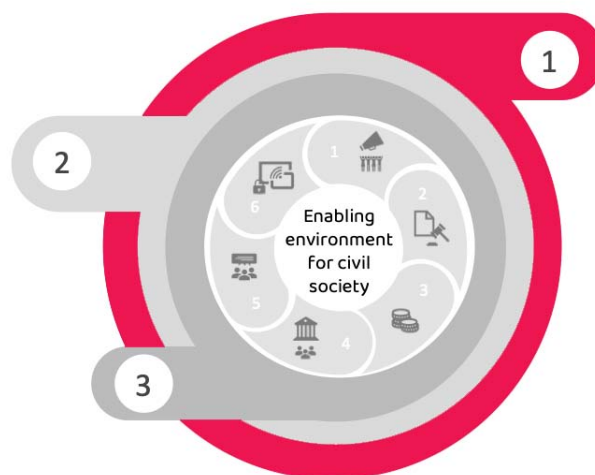
Civil society evidence demonstrates how the three pillars are connected to restrictions that transcend individual pillar boundaries. For instance, a restrictive NGO law can undermine civic space, access to funding, participation and accountability at the same time. A funding cut may weaken advocacy, reduce coalition work and make organisations less able to invest in transparency or community accountability. This means that **implementation cannot be assessed pillar by pillar alone**, it needs a wider **enabling environment lens to show its full impact on civil society.**

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Pillar 1: Respecting, protecting and promoting civic space

Pillar 1 is centred around the responsibility of providers to respect, protect and promote civic space in their roles as development cooperation and humanitarian assistance providers. Civil society recognises several positive steps in relation to the implementation of Pillar 1. Many providers now refer more explicitly to civic space and the work of civil society, in development, democracy and human rights policies: Canada's Voices at Risk Guidelines, the European Union's (EU) Human Rights and Democracy Action Plan or its new EU Civil Society Strategy all exemplify this. Some providers have supported human rights defenders, independent media, women's rights organisations, digital security initiatives and actors working under pressure. Civil society also values support for monitoring and early-warning systems such as the EU SEE initiative, which generate country-level evidence and give civil society protection and content which feeds into advocacy and political dialogue. Dialogue and participation spaces around EU-led policy and planning initiatives such as



the Policy Forum on Development or the Team Europe Democracy Initiative are appreciated as opportunities to influence. Similarly, support for civil society to engage with United Nations (UN) Universal Periodic Reviews (UPR) or Agence Francaise de Développement (AFD)'s Initiative OSC (Organisations de la Société Civile) are seen as positive. The OECD toolkits and related peer-learning processes are also useful; they have helped improve the framing of civic space, funding, power shifts and donor coordination. They give providers and civil society a stronger basis for discussing how commitments should be implemented.

PRACTICES CIVIL SOCIETY VALUES

Canada

- Voices at Risk Guidelines

European Union

- Human Rights and Democracy Action Plan
- EU Civil Society Strategy
- EU SEE initiative
- Policy Forum on Development
- Team Europe Democracy Initiative

United Nations

- Engagement with UN Universal Periodic Reviews (UPR)

Agence Francaise de Développement

- Initiative OSC (Organisations de la Société Civile)



The main implementation gap under Pillar 1 is that **provider action is still experienced as too reactive, fragmented and politically cautious**. Monitoring does not always lead to action. Early warnings about restrictive laws, protest repression, digital shutdowns or attacks on activists do not consistently trigger rapid, coordinated diplomatic, financial or protective responses.

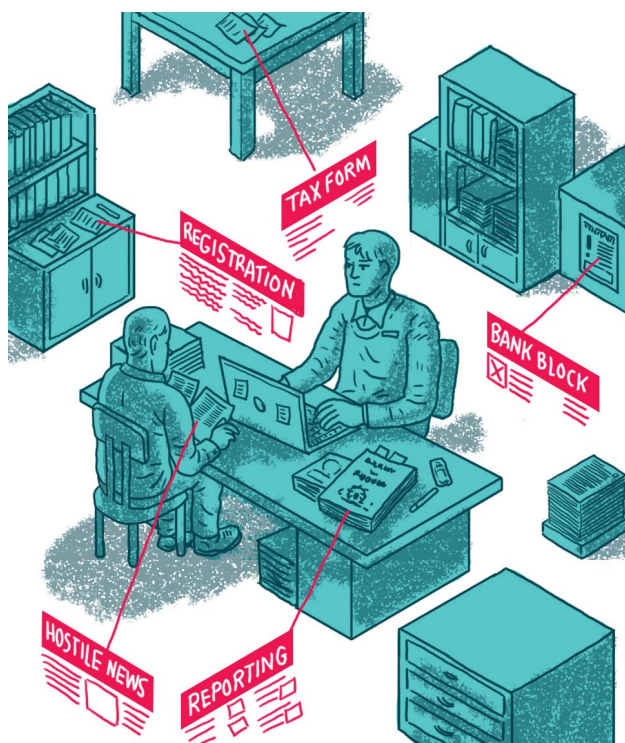


Attention for digital repression is a particularly significant gap. The current context shows that digital technologies are not only tools for participation and access, they are also tools of control. The evidence reviewed suggests that surveillance, platform restrictions, cybercrime laws, internet shutdowns, biometric systems and online harassment are now central to how civil society is restricted. Yet donor responses remain limited and ad hoc. The framing in Pillar 1 is limited to potential for participation and engagement through use of digital technologies, and inequities in access to digital technologies. **Both of these framings sidestep the current context, in which the digital sphere is an accelerator of repression.**

This reveals an important lesson for Pillar 1: civic space protection cannot be limited to formal freedoms or visible repression, it must include the legal, administrative, financial, digital and narrative pressures that make those freedoms harder to use.



Civil society also reports that **some of the most important restrictions are not always recognised early enough**. These include administrative delays, banking restrictions, fiscal pressure, burdensome reporting rules, digital surveillance, cybercrime laws, online intimidation and public narratives that portray civil society as suspicious or foreign-controlled. These are often less visible than bans or arrests, but they can be just as effective in narrowing civil society's operating conditions.

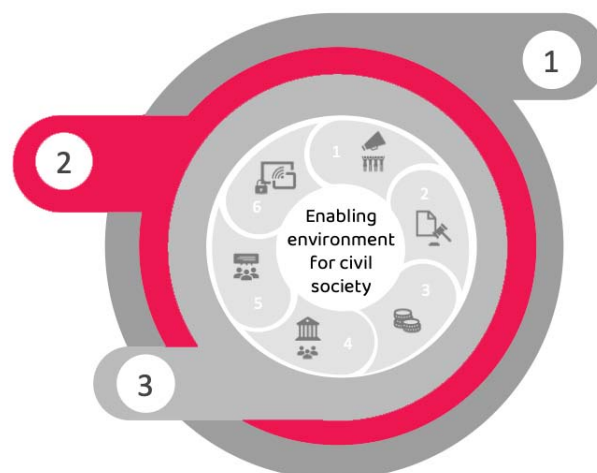


Pillar 2: Supporting and engaging with civil society

Pillar 2 speaks directly to how DAC members fund, engage with and relate to civil society. Civil society recognises that there have been positive developments, including providers that have maintained or broadened civil society engagement and consultation spaces, where CSOs can engage in policy dialogue, contribute to human rights processes, or participate in development and cooperation discussions. Examples include:

- The EU-level forums and national platform dialogues;
- EU and French support architectures, including:
 - NDICI – Neighbourhood, Development and International Cooperation Instrument;
- Global Europe and AFD instruments such as:
 - CND SI – National Council for Development and International Solidarity.

Some providers have experimented with flexible funding, programmatic support, simplified procedures or supported local leadership, like Canada's investment



in an Equality Fund, Ireland's multi-annual Civil Society Partnership, flexible programmatic funding by Switzerland and Finland, or support to diaspora networks by Italy. Support to CSOs in restrictive contexts such as Nepal, Uganda and Zimbabwe is especially valued, and so is engagement with platforms and regional coalitions, which civil society sees as essential for coordination and to connect local evidence to national, regional and global advocacy. Similarly, initiatives like AFD-funded Réseau F3E committed to advancing CSO-led learning are greatly valued. These examples matter because they show that better practice exists.

PRACTICES CIVIL SOCIETY VALUES

Canada

Equality Fund

European Union

- EU-level forums and national platform dialogues
- EU and French support architectures
- NDICI – Neighbourhood Development and International Cooperation Instrument
- Global Europe and AFD instruments
- CND SI – National Council for Development and International Solidarity

Switzerland and Finland

Flexible programmatic funding



France

Réseau F3E

Ireland

Multi-annual Civil Society Partnership

Italy

Support to diaspora networks

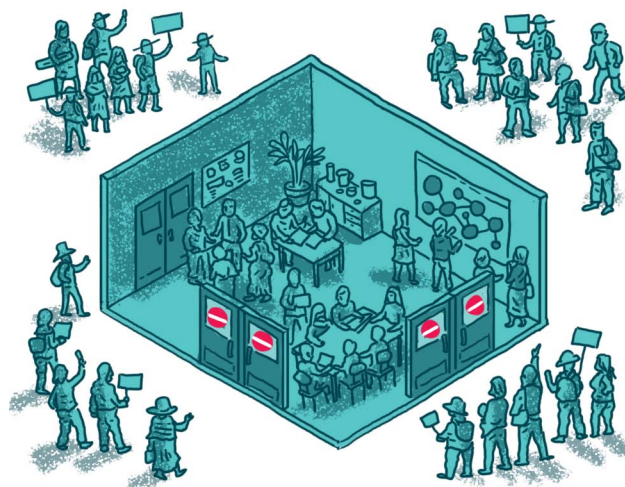
Nepal, Uganda and Zimbabwe

Support to CSOs in restrictive contexts

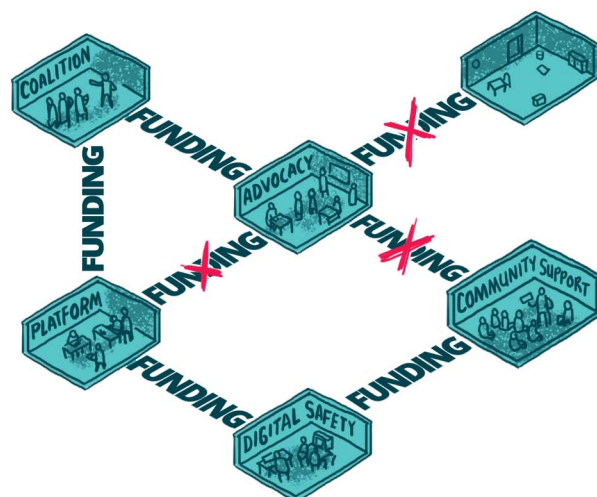
However, the **depth, accessibility and accountability of participation and dialogue spaces is uneven**. First, participation often remains formal and does not translate into shared decision-making: civil society may be invited to meetings, consultations or policy spaces, but without evidence on how its input will be used or whether it will influence decisions. Feedback loops are often weak or absent and some spaces are open far too late in the decision-making process. Others are accessible mainly to larger, capital-based or international organisations, excluding a broad representation of national and local organisations.



Second, there is a deep concern that ‘participation’ or ‘consultation’ is used by some to instrumentalise CSO engagement. In some contexts, state-aligned organisations or government-organised NGOs (GONGOS) are given access while independent, critical or human rights-focused actors are excluded. This creates a risk that consultation spaces legitimise decisions rather than allow genuine influence. Evidence shows that in contexts with more restrictive regimes, such as Zimbabwe, Paraguay, Peru, Nepal and Tanzania, additional political barriers can limit engagement further. It also highlights that even where consultations exist, they may remain shallow, as seen in examples from Chile, Zambia, Malaysia and Papua New Guinea.



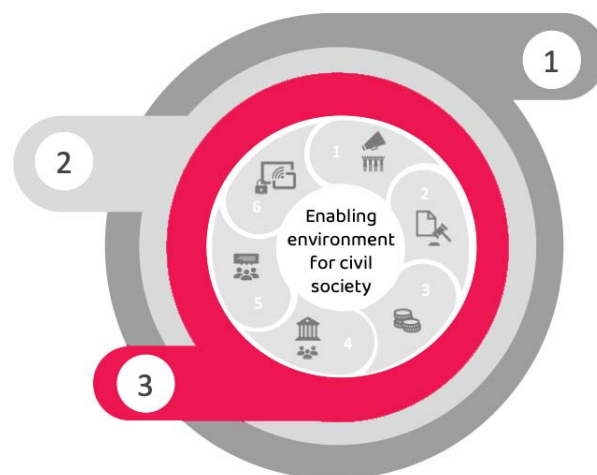
Third, the **funding environment has deteriorated sharply, critically affecting whether civil society can organise, advocate, protect communities, coordinate with others and participate meaningfully**. Civil society evidence repeatedly points to the limits of short-term, project-based funding which is increasingly directed to supporting activities, but less so to sustaining organisations or coalitions, supporting long-term advocacy or accountability agendas, digital safety or legal defence. It can also push organisations to follow donor-safe themes, rather than respond to the most urgent or at-risk rights. This is especially important for **localisation** which risks being reduced to shifts in terms of who holds the contract, instead of creating opportunities for local civil society to set agendas.



“Localisation risks being reduced to shifts, instead of creating opportunities for local civil society to set agendas.”

Pillar 3: Incentivising CSO effectiveness, transparency and accountability

Pillar 3 focuses on how providers support CSOs' own effectiveness, transparency and accountability, including through support to CSO self-regulation, mutual capacity strengthening, leadership and collaboration among CSOs and adherence to standards. It is important because all these are essential to civil society's legitimacy and impact. Civil society recognises some positive steps with support to **organisational strengthening, peer learning and progress towards more equitable partnership and mutual accountability discourse among DAC members**, with examples from Ireland and Finland cited, and France's organisational strengthening and peer-learning mechanisms are frequently highlighted as useful practice (FRIO – Fund for Institutional and Organizational Strengthening). Other areas showing promise include contributions by Canada, Ireland, Finland



and Switzerland to **safeguarding and prevention of sexual exploitation and abuse**. Some have also supported CSO-led transparency and accountability initiatives for instance in Chile and Lesotho. Re-granting and accompaniment models have also helped smaller organisations access support in Kenya, Madagascar and Nepal. All of these efforts have helped organisations strengthen governance, improve learning, deepen community accountability and manage risks.

PRACTICES CIVIL SOCIETY VALUES

Ireland and Finland

- Support to organisational strengthening
- Peer learning
- More equitable partnership and mutual accountability discourse

France

- Organisational strengthening
- Peer-learning mechanisms

Canada, Ireland, Finland and Switzerland

- Safeguarding and prevention of sexual exploitation and abuse

Chile and Lesotho

- CSO-led transparency and accountability initiatives

Kenya, Madagascar and Nepal

- Re-granting and accompaniment models

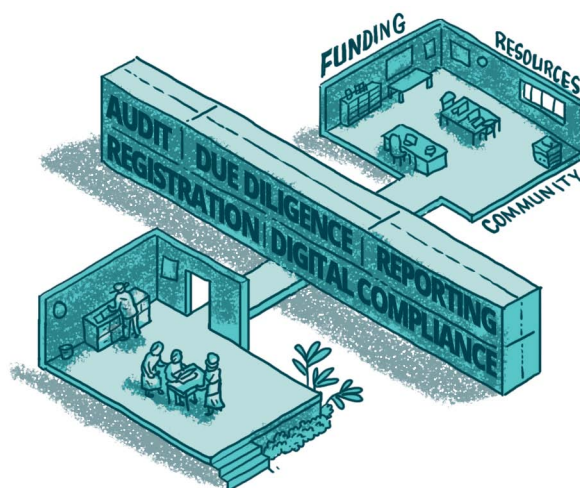
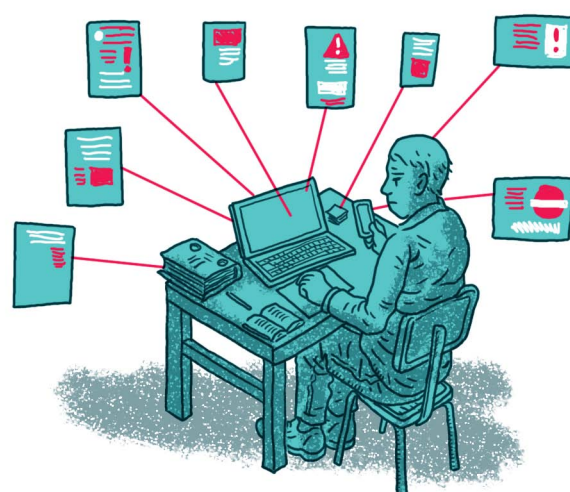
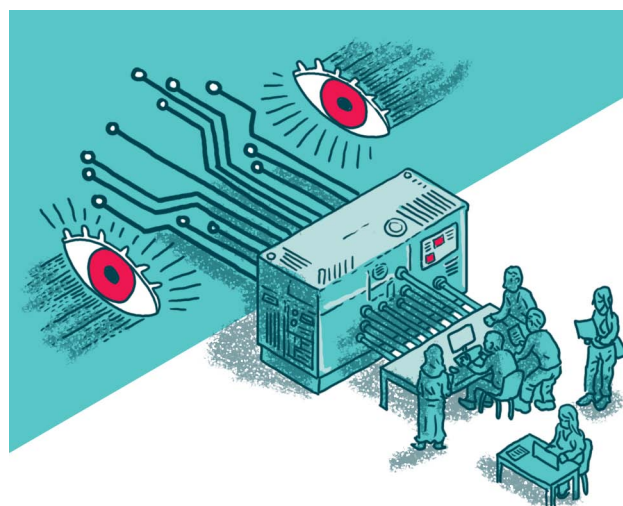


The implementation gap relates to donor systems that **privilege provider-designed compliance over CSO-led accountability**. Overly complex reporting and auditing processes, context-blind due diligence and digital compliance systems can make accountability a burden or a barrier, rather than a supported function of effectiveness. This has a particular impact on local, grassroots, youth-led, women-led, Indigenous, informal and community-based organisations which can effectively be barred from accessing resources. These groups are often closest to communities, but they may lack the administrative infrastructure required by donor systems. When systems designed for large international organisations are applied to small local groups, they can reproduce the same power imbalances that localisation is meant to address.

There is also a **serious risk that transparency and accountability measures are weaponised by states**. In contexts like Paraguay, El Salvador, Nepal, Tanzania and Zimbabwe, laws framed around transparency, anti-money laundering (AML), counter-terrorism financing (CFT) or foreign funding have been used to control, stigmatise or close civil society organisations. The material reviewed notes that in politically restrictive settings, including Tanzania, Nepal, Pakistan, Venezuela and Zimbabwe, extensive disclosure requirements or rigid digital compliance systems can expose organisations and activists to surveillance or retaliation. So when donors do not clearly distinguish between CSO-led accountability and state-led control, they can unintentionally reinforce restrictive environments.

This reveals an important lesson for Pillar 3: accountability requirements can strengthen civil society when they are proportionate, locally owned, resourced and connected to communities. They can weaken civil society when they become burdensome, unsafe, externally imposed or aligned with restrictive state practices.

“Accountability requirements can strengthen civil society when they are proportionate, locally owned, resourced and connected to communities.”



Overall assessment of implementation

Civil society's overall assessment is that the Recommendation has not yet become operational enough. While it has undoubtedly helped establish a shared standard, supported learning, tool development and some positive practice, civil society does not yet experience it as having consistently changed the conditions under which it works. The central implementation gap is therefore not about whether DAC members have taken action but about **whether those actions are solid enough, timely, coherent and close enough to civil society realities**. The next

phase of implementation therefore should **move from recognition, procedures and consultation toward practical capability, early action and measurable impact**.

"The central implementation gap is about whether those actions are solid enough, timely, coherent and close enough to civil society realities."



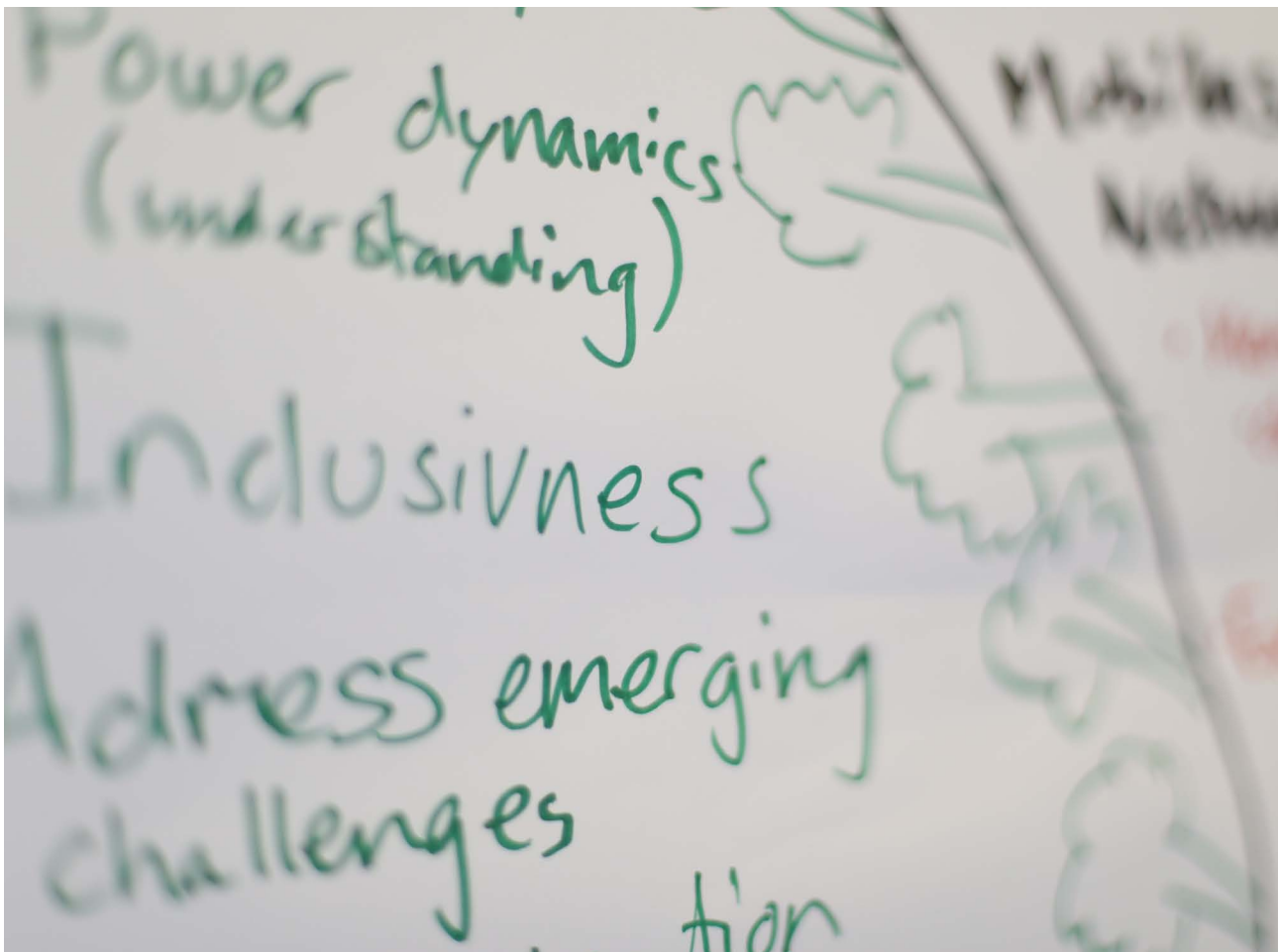
3.2 How civil society has experienced the enabling environment

This section maps civil society evidence across the six enabling environment dimensions. This provides a fuller picture of what civil society's experience looks like, and of **whether the Recommendation is having the desired ultimate impact of enabling civil society.**

The evidence reviewed provides a clear picture. **Civil society is experiencing deterioration across all six dimensions of the enabling environment.** The most important pattern to highlight is that **restrictions are cumulative**, they are not experienced as separate problems, but **mutually reinforce each other**. Legal restrictions can limit access to funding; funding cuts can weaken advocacy and coalition work; hostile public narratives can help justify new controls; and digital

repression can amplify threats across every other dimension. The wider enabling-environment lens shows how formal rights may remain in place while civic action becomes riskier and more contested, and is essential for identifying deterioration early.

“The wider enabling-environment lens shows how formal rights may remain in place while civic action becomes riskier and more contested, and is essential for identifying deterioration early.”



FUNDAMENTAL FREEDOMS:

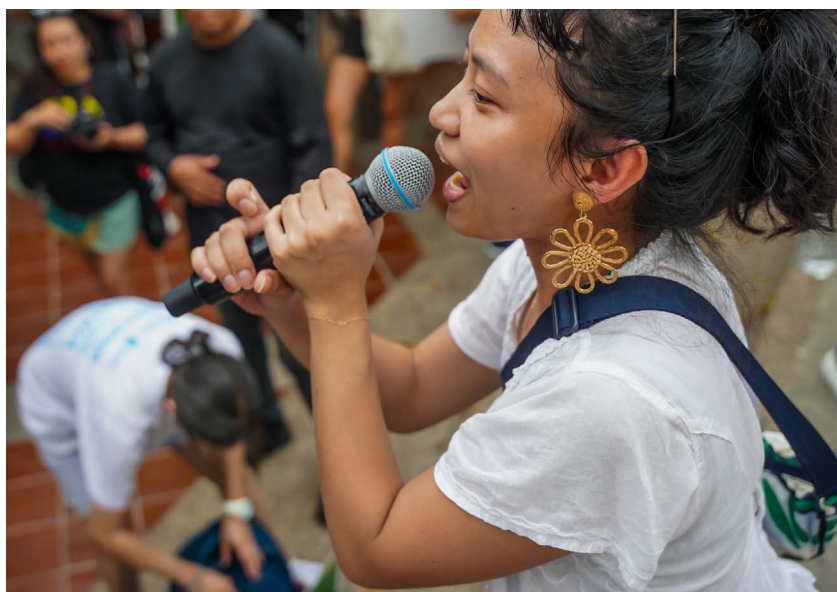
Formal rights are becoming harder to exercise

Civil society reports **increasing direct and indirect restrictions on freedom of association, assembly and expression**. These include blanket bans on protests that easily evolve into excessive use of force; restrictions on public meetings; arrests; intimidation; surveillance and criminalisation of dissent. They also include pressure on journalists, human rights defenders, environmental defenders, Indigenous leaders and activists working on politically sensitive issues. The evidence reviewed shows recurring patterns of restrictions intensifying around elections, protest cycles, governance crises, land and environmental conflicts, fiscal reforms, anti-corruption work and debates on rights. In these moments, authorities may use public order, security or emergency arguments to restrict civic action.

Authorities often rely not only on formal bans, but on selective enforcement, intimidation, surveillance, arrests and administrative pressure, creating a chilling effect even where constitutional protections formally remain in place. The key issue is therefore not whether freedoms exist in law, but whether they can be safely used. Civil society evidence shows that **the cost of exercising rights is rising and that organisations are self-censoring to meet it**: they may decide not to hold a public event, join a protest,

issue a statement or challenge a policy because the risk is too high. This is important because pressure on civic action is no longer confined to overtly authoritarian contexts. Fundamental freedoms are also under pressure where securitisation and executive power are expanding within formal democracies. In DAC member countries, restrictions may appear as “soft” pressure. A consultation participant from a European CSO noted, even in democratic contexts, “formal rights may remain intact, but there are other tactics that are being used to repress voice”. These include limits on protest locations, policing of dissent, hostile narratives, funding insecurity, surveillance, or exclusion from policy spaces, all of which are having a stifling effect on civil society voices.

Examples across the evidence include protest repression and arrests in contexts such as Madagascar, Nepal, Peru, Paraguay, Tanzania and Kenya; pre-election pressure in Zambia and Uganda; and restrictions affecting activists, journalists and defenders in several regions, including in DAC member countries, albeit on a different scale. Formal freedoms remain foundational. However, attacks on assembly, association and expression are increasingly enabled through other dimensions of the environment, preventing those rights from being used.



“...recurring patterns of restrictions intensifying around elections, protest cycles, governance crises, land and environmental conflicts, fiscal reforms, anti-corruption work and debates on rights.”

LEGAL AND REGULATORY FRAMEWORKS: Restriction through ordinary rules

Civil society is experiencing growing **legal and regulatory pressure which is often presented as ordinary governance**. This normalisation of restriction through laws and regulations formally framed around transparency, anti-corruption, anti-terrorism, or public order, online safety, and cybersecurity and taxation, registration or foreign funding, is in practice **increasing state discretion and constraining civil society work**.

One of the strongest trends in the evidence is that **restrictions increasingly operate through grey-zone tactics** rather than outright bans. These include delayed registration, non-issuance of documents, repeated renewals or intrusive reporting, unclear tax rules, banking restrictions. Foreign-funding controls, public-order permissions, and ambiguous cybercrime provisions are also used in this way.

A consultation participant from Latin America emphasised that, when bureaucratic overreach continues over time, “administrative restriction becomes normalised.”

Further evidence of “administrative suffocation” was presented by consultation participants based in Africa describing organisations left in legal limbo because authorities did not issue registration receipts or official documents, which in turn excludes CSOs from funding, participation spaces and donor eligibility. Evidence of burdensome and intrusive legislation limiting CSO work was found in Cambodia, Honduras, Paraguay, Bolivia, Venezuela, Mexico, India, the DRC, Central Africa, Zambia, Zimbabwe, Hungary, Tunisia and Morocco, among others.

Legal pressure also includes lawfare. Informants reported cases of organisations and defenders facing judicial harassment cases designed to drain their time, resources and morale, especially when they challenge powerful political or economic interests. This deserves more attention in future implementation of the Recommendation, including through support for legal defence, strategic litigation and anti-SLAPP - Strategic Lawsuit Against Public Participation measures.



Grey-zone restrictions create a chain of exclusion

Grey-zone restrictions often work because no single act looks like a full ban. Instead, several administrative steps combine to weaken civil society.



**Non-issuance
of a final
registration
receipt**

Participants from **Morocco** described how the non-issuance of a final registration receipt excluded organisations from Open Government processes and funding opportunities: “it is through this restriction that civil society finds itself excluded”.



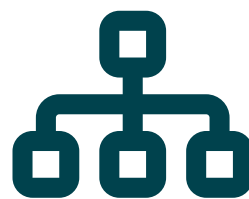
**NGO registration
down 89%
(2015 - 2025)**

Bolivian participants reported an 89% reduction in NGO registration between 2015 and 2025 following regulatory changes in 2013. Civil society did not stop working, but many organisations had to find ways to continue to work despite being unable to fit draconian legal recognition requirements.



**Temporary
documentation
expires before
registration
processes are
completed**

DRC and Central African participants described how temporary documentation can expire before authorities complete registration processes. When donors then refuse to fund active organisations because they lack official documents, their due diligence unintentionally reinforces state administrative restrictions.



**500 civil society
organisations
- only 2 registered**

Participants from Venezuela described an ecosystem of more than 500 civil society organisations where only 2 had achieved full registration. This shows how civil society can continue to exist socially and politically while being almost erased legally.

These examples illustrate that legal restriction today is less about one-off prohibitions and more about systematic narrowing through routine governance tools. This calls for context-sensitive donor systems and early monitoring of administrative restrictions. But also, for donor due diligence requirements that avoid reproducing the very restrictions they are meant to mitigate.

RESOURCES AND FUNDING CONDITIONS:

Funding is part of the enabling environment

Funding contraction is reshaping civil society ecosystems by not only reducing budgets, but determining which organisations survive, which issues remain fundable, which actors can speak, and which forms of advocacy become too risky. As a consultation participant in Latin America explained “in the last three years [donors] have only financed projects related to water sanitation, circular economy and the defence of green spaces. It is not that these are unimportant... It just shows how donors refrain from complex issues or from funding organisations that are truly making the country's situation visible.”

Recent funding shocks have shown how quickly resource pressure becomes an enabling-environment risk. Seven in ten CSOs surveyed in 2025 were directly affected by the US funding freeze with around half reporting new barriers in their operating environment after the freeze. Among affected organisations, the most common budget-loss band was 25–50%. Funding shocks move from financial disruption to civic risk when organisations freeze contracts, reduce staff, cancel activities and withdraw from coalitions; or when they lose the ability to monitor power, respond collectively to threats or support communities in crises. Short-term and restricted funding pushes organisations into survival mode, and limits their ability to invest in areas like legal defence, digital safety, narrative work, safeguarding, internal governance or accountability to communities.

Funding emerged as one of the strongest civil society concerns. It was the most frequently prioritised issue in the Thinking Rooms and a top advocacy ask for survey respondents. Funding is part of the enabling-environment infrastructure and the current funding crisis is both financial and political. ODA cuts, donor exits, short project cycles, reduced support for rights-based work, and increased use of development finance and investment models are changing the operating conditions for civil society. Organisations working on democracy, human rights, gender justice,

environmental protection, anti-corruption, digital rights and accountability are especially exposed.

Civil society also points to donor risk transfer. **Local organisations are often asked to carry political and operational risks without adequate resources, protection or flexibility.** Meanwhile, funding often continues to flow through large intermediaries, which can reproduce power imbalances and weaken the promise of localisation. One participant in Africa described an illustrative example of humanitarian funds continuing to privilege international organisations, eroding trust in donors' commitment to the localisation agenda. The evidence also shows that funding shocks can be politically weaponised. In some contexts, reduced external funding has been accompanied by narratives portraying NGOs as foreign-controlled, corrupt or linked to money laundering or terrorism financing. This creates a vicious circle between funding conditions, public narratives and legal restrictions. Examples of such feedback loops have emerged in Indonesia, Malaysia, Myanmar, Cambodia and India. Nigeria, El Salvador, Paraguay and Peru show how funding shocks are being weaponised; while Mexico, Panama, DRC, Uganda and Morocco are examples of states' discretionary use of regulations to curtail CSO access to funds.

Beyond the financial shock itself, reduced funding weakens donor presence, narrows protective relationships, undermines localisation and can make organisations more cautious about advocacy and initiatives that tackle power and inequality. Resource insecurity is both a global political economy issue and a direct mechanism for narrowing civic space.

“Funding is part of the enabling-environment infrastructure and the current funding crisis is both financial and political.”

OPEN AND RESPONSIVE STATE: Participation without influence

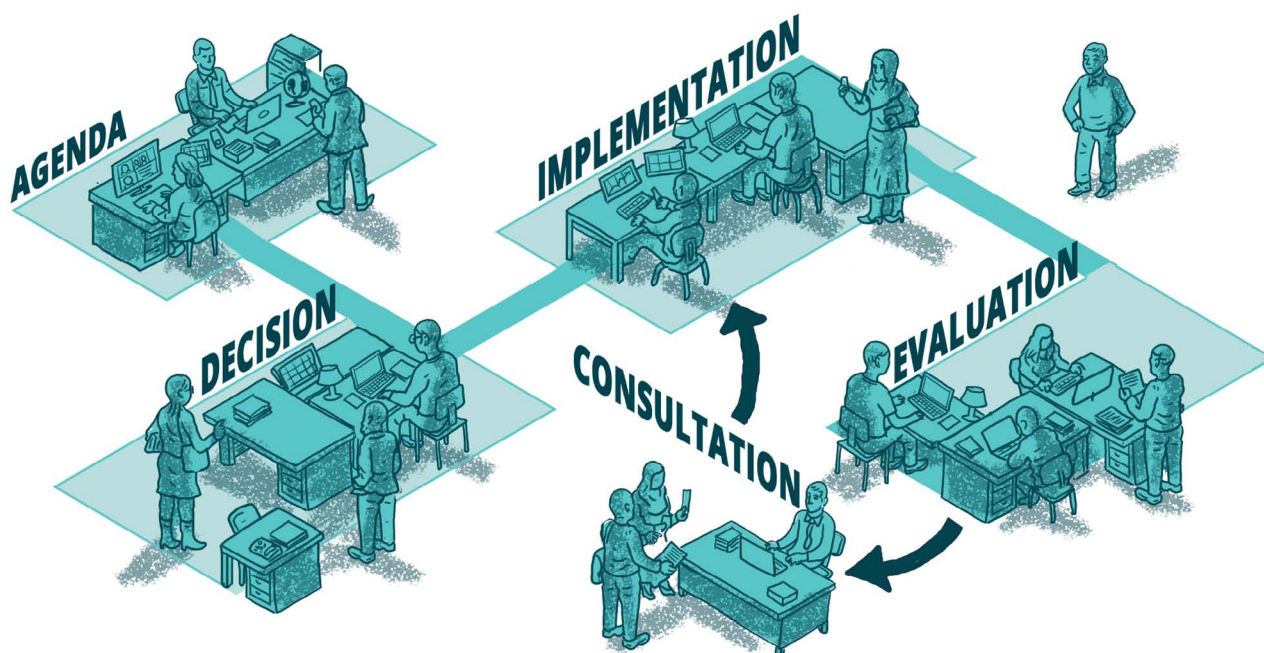
Civil society's experience of participation is mixed: while formal consultation mechanisms endure, meaningful state openness is eroding. Formal spaces often exist and some have created genuine openings, with examples including certain Open Government processes, policy dialogues, human rights mechanisms, constitutional reform discussions, local participation frameworks and multilateral consultations, such as the EU NGO Forum, African Union (AU)-EU and EU-LAC processes. However, civil society reports that **many participation spaces remain weak, symbolic or disconnected from decisions**. Organisations may be invited to speak, but not to shape agendas; they may provide evidence, but not receive feedback; or they may be consulted after key decisions have already been made. So while organisations may voice their concerns, it will often not lead to changes in policy, funding or protection, with consultation being used to legitimise decisions that civil society did not influence. Evidence from Cambodia, Philippines, Senegal, Zambia, Tunisia and Chile all illustrate how **civil society-state relations should be assessed in terms of responsiveness and accountability**, not just

the existence of meetings or invitations. A Northern African participant suggested that "civil society must be present upstream of agreements, in the preparation of agreements and in the evaluation of their results."

The Thinking Rooms also raised the **risk of co-optation**. In some contexts, participation spaces may privilege state-aligned organisations or "acceptable" service-delivery groups, while excluding independent, critical or rights-based actors. There are also access barriers for informal and minority actors as well as smaller community-based organisations, which include language, location, digital access, funding, security concerns and lack of support to prepare and follow up.

Civil society has also noted that newer decision-making spaces are becoming more important. These include public development banks, multilateral development banks, investment compacts, regional bodies and private sector partnerships, many of which do not yet have strong, institutionalised civil society participation mechanisms.

The policy-process pathway



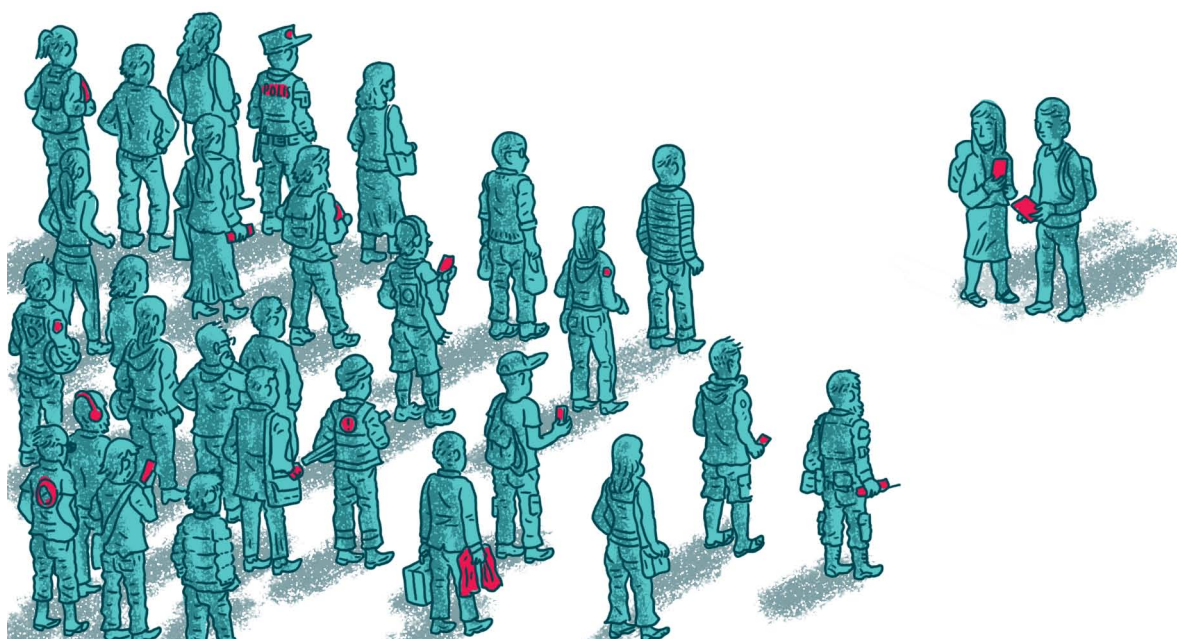
PUBLIC DISCOURSE AND NARRATIVES: Legitimacy is a battleground

Public discourse and narratives are important because they shape the legitimacy, safety and political room for civil society action. Our evidence shows that civil society is experiencing a rise in hostile public narratives that portray CSOs as foreign agents, spies, elites, opposition actors, destabilising forces, threats to sovereignty, or obstacles to national development. Similarly, areas such as human rights, gender equality, climate justice, anti-racism, migrant rights and democracy work are often framed as foreign or ideological agendas. These narratives are not just background noise but part of the restriction process designed to weaken public trust and prepare the ground for legal controls, funding restrictions, exclusion from policy spaces and attacks on defenders.

The Thinking Rooms confirmed that narratives are a central part of the enabling environment. Participants described anti-civil society narratives across regions, including in DAC-member countries, where politics are also becoming less supportive as migration, climate, gender equality and anti-racism become more polarised. They also stressed that hostile narratives do not come

only from governments, they circulate through media, political movements, religious and cultural institutions, influencers, online platforms and disinformation networks. Examples across our evidence base include hostile civil society discourse in Argentina, Uganda, Pakistan, Nigeria, El Salvador, Peru, Hungary, Tunisia, Denmark, France and the United States. The specific language differs by context, but the pattern is similar: delegitimisation prepares the ground for restriction.

Civil society is also reflecting critically on its own communication. Several Thinking Room participants noted that civil society cannot assume its own legitimacy. Organisations need to explain their role and value in language that communities understand. A participant from South Asia noted that “the type of language we speak, the type of language we write, only we can understand.” This underscores the need for provider support to public narrative work, storytelling and civic education. Positive narratives must show why civil society matters for everyday life, its role sustaining rights and democratic values, furthering accountability, and promoting solidarity.



SECURE DIGITAL ENVIRONMENT:

Digital repression is now central to civic life

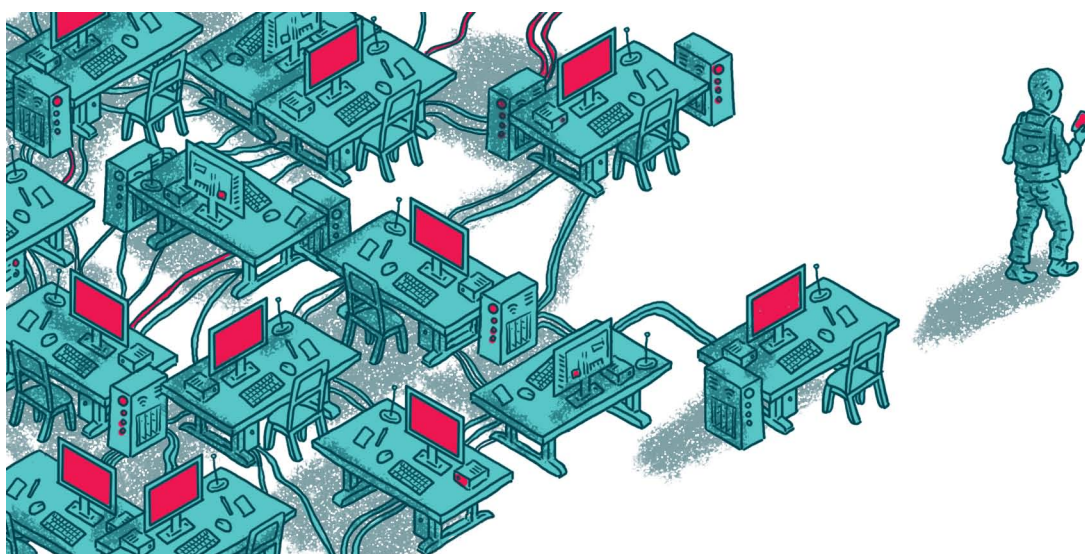
Digital space is now part of the core infrastructure of civic life: civil society uses digital tools to organise, communicate, document abuse, mobilise communities, raise funds, participate in debates and reach decision-makers. When digital space is curtailed, civil society's operating conditions are restricted.

Civil society reports a rapid increase in digital repression, through internet shutdowns, platform bans, online harassment, doxxing, cyberattacks, surveillance, spyware, biometric systems, cybercrime laws, online safety laws, content blocking, AI-assisted monitoring, disinformation and weak responses from technology companies. A Southeast Asian participant reported that "digital repression now directly affects freedom of expression, association and participation."

Digital repression cannot be treated only as a technical or cybersecurity issue since it affects fundamental freedoms, legal frameworks, public narratives, participation, protection and access to resources. **Activists and civil society actors face growing online harassment, surveillance and attacks that can spill over into offline threats and violence.** Examples in

the evidence include internet shutdowns in Uganda; concerns around cyber laws in Zambia and Kenya; cybercrime allegations against journalists in Nigeria; platform and surveillance risks in Myanmar, Indonesia and Pakistan; social media restrictions in Nepal; biometric and mobile-phone identification concerns in Mexico; and criminalisation of online expression in Cambodia and Indonesia. The pattern shows that **the digital environment is now one of the main arenas in which civil society's future is being contested.**

The Thinking Rooms challenged donor approaches to digital security that focused on quick technical fixes that often did not match the actual local needs. Rather than technical advice on Virtual Private Networks (VPNs), password protection and data blockers, which many CSOs can address themselves, the need is for strategic and politically sensitive digital resilience support that includes legal defence, addresses secure communications and anti-surveillance advocacy. Platform accountability and responsiveness is increasingly seen as essential to a secure digital environment and a priority area for action therefore, along with online narrative capacity and protection against shutdowns and digital harassment.



Regional and differentiated experiences

The same broad patterns appear across regions, but they take different forms. The table below summarises the main regional patterns emerging from the evidence.

REGION	DOMINANT PATTERNS	GROUPS ESPECIALLY AFFECTED
Africa	Legal and administrative tightening, securitised responses to dissent, election pressure, funding fragility, conflict and emergency measures, restrictions around extractives and accountability work.	Human rights defenders, journalists, student movements, watchdog actors, grassroots organisations, organisations working in conflict-affected contexts.
Latin America and the Caribbean	Hollowing out of democratic practice, land and environmental conflict, public security pressures, fiscal and foreign-funding controls, polarisation, weak protection systems.	Indigenous Peoples, environmental defenders, women's rights organisations, journalists, anti-corruption actors, human rights defenders.
Asia-Pacific	Legal restrictions, foreign-funding controls, securitised governance, protest repression, red-tagging, digital surveillance and cybercrime frameworks.	Rights-based CSOs, journalists, online activists, student movements, grassroots organisations, organisations working on politically sensitive issues.
MENA	Centralised executive power, securitisation, restrictive legal frameworks, digital surveillance, criminalisation of online speech, delegitimising narratives.	Independent CSOs, journalists, rights defenders, feminist actors, youth activists and informal movements.
Europe and North America	Stronger formal protections, but growing grey-zone pressure, protest restrictions, polarised narratives, securitisation of dissent and funding pressure on contested rights work.	Migrant-rights groups, climate activists, anti-racism groups, organisations working on Palestine solidarity, gender equality and civil liberties.

Restrictions also affect specific groups differently. Women-led organisations and women human rights defenders face rights rollback, stigma, digital abuse and violence. Indigenous Peoples, environmental defenders and land defenders face risks linked to extractive interests and state-led development agendas. Migrants, refugees and displaced people face hostile narratives, while organisations supporting them face backlash.

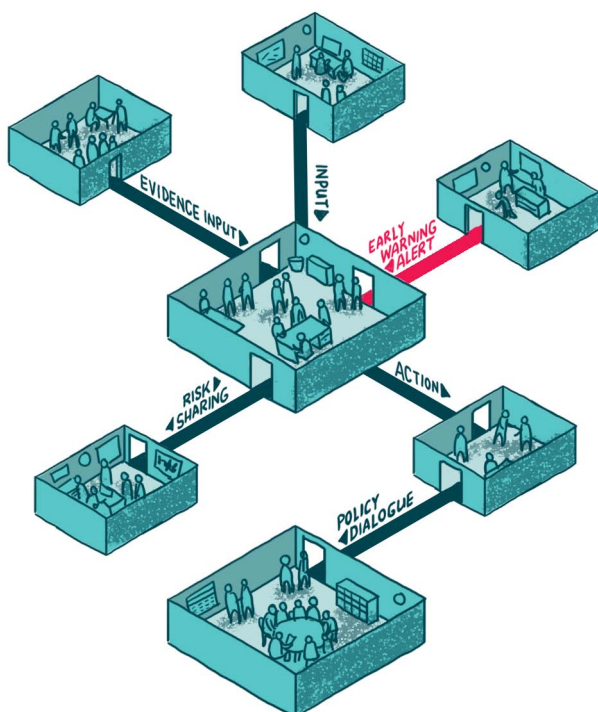
Youth and student movements are often targeted for protest and online mobilisation. LGBTQIA+ organisations face anti-rights narratives and funding vulnerability with increasing legal restrictions

particularly in some parts of Africa. Grassroots, rural, informal and community-based organisations are often most exposed to funding contraction and compliance burdens. Disability-led organisations are frequently excluded from consultation processes that are not accessible, and are among the least resourced when funding shrinks.

The enabling environment is therefore not experienced evenly. **Restrictions are felt most sharply by groups that are already under-resourced, politically contested, structurally excluded or dependent on collective organising to defend their rights.**

Good practice which is already helping

Civil society evidence also points to practices that should be protected and expanded. **Early-warning systems are helping CSOs anticipate restrictions, prepare evidence and engage earlier.** National risk mapping can adapt global tools to local realities. Context-sensitive donor support can avoid excluding active CSOs that lack formal documentation because of state obstruction. EU and other policy dialogue spaces can offer openings when they include feedback and follow-up. CSO-led narrative work, including stories, podcasts and public communication, can help civil society explain its role in more accessible ways.



National platforms, regional coalitions and civil society networks are central to many of these practices. They convene diverse actors, defend pluralism, document patterns, share risk, connect local evidence to policy spaces and sustain collective voice. They are not only intermediaries but a critical part of the civic infrastructure that allows civil society to act collectively.

Early warning as anticipatory civic-space infrastructure

Early warning is not only about documenting violations after they happen, it can help civil society anticipate restrictions before they become fixed.

A consultation participant in South Asia described how an early-warning system had helped CSOs identify a proposed restrictive law that was being copied from another state. CSOs were then able to review the impact of the earlier law, share evidence within their circles, and prepare to negotiate with their own state government before the restriction was adopted.

Coordination actors can play a key role supporting prevention through early warning systems. Anticipatory warning requires networks that can compare patterns across jurisdictions, gather evidence quickly and connect local analysis to advocacy.

3.3 Implications for the OECD-DAC Recommendation and for DAC members

The evidence presented in Sections 3.1 and 3.2 points to one overarching implication: the OECD-DAC Recommendation is more relevant now than when it was adopted, but its next phase of implementation needs to be more practical, more political and more responsive to civil society's lived operating conditions. Civil society recognises the DAC Recommendation's worth. It questions, however,

whether **implementation has been strong enough to significantly impact the conditions under which civil society works**. This section summarises the key implications that emerged from the research and consultation, while the final section builds out those implications into specific policy asks directed towards the DAC and DAC members in support of an enabling environment.



IMPLEMENTATION SHOULD BE ASSESSED BY EXPERIENCED IMPACT

The next phase of the Recommendation needs to measure implementation by its effect on civil society, not only by reported provider activity. Policies, strategies, tools and dialogue spaces matter, but they are intermediate steps. The more important test is whether civil society organisations can register, receive funds, speak publicly, organise safely, participate meaningfully and hold power to account. It also matters who can do this: smaller, local, rural, women-led, youth-led, Indigenous, informal, watchdog and rights-based organisations often face the greatest barriers. This implies a shift from assessing commitments to **assessing practical change in operating conditions**.



THE RECOMMENDATION NEEDS A FULL ENABLING-ENVIRONMENT LENS

Civil society restrictions are multi-dimensional. They include attacks on fundamental freedoms, but also legal pressure, administrative obstruction, funding insecurity, hostile narratives, weak participation and digital repression. These pressures interact, as our evidence has shown: a registration delay can block funding and participation; a funding cut can weaken advocacy and coalition work; a cybercrime law can chill expression and association. The Recommendation will be more useful if DAC members apply a full enabling-environment lens across all three pillars. This means **looking at the combined effect of legal, financial, political, narrative and digital pressures, rather than treating them as separate issues**.



EARLY WARNING SHOULD LEAD TO EARLY ACTION

Civil society values monitoring and early-warning systems, but monitoring alone is not enough. The evidence shows that restrictions often escalate around predictable moments: elections, protests, governance crises, restrictive draft laws, funding controls, AML/CFT measures, public-order decisions and digital shutdowns. These should be treated as **signals for preventive action**, not only as issues to document after harm has occurred. The key implication is that DAC members need clearer **links between evidence, political engagement, funding flexibility, protection and coordinated response**.



RESOURCING AND FUNDING QUALITY IS PART OF CIVIL SOCIETY PROTECTION

Resourcing is one of the clearest gaps between the language of partnership and civil society's experience. The evidence shows that funding conditions shape whether civil society can survive, take risks, advocate, coordinate, learn and remain accountable to communities. This means that funding should not be treated only as a donor modality; it is a foundational part of the enabling environment. Flexible, accessible, long-term and rights-based funding helps civil society remain independent and resilient. Abrupt cuts, short project cycles, heavy compliance, donor exits and risk transfer, on the other hand, weaken civic ecosystems. The implication for the Recommendation is that **implementation should assess not only whether funding to civil society exists, but whether that funding enables civil society to act independently, safely and sustainably**.



PARTICIPATION SHOULD BE JUDGED BY INFLUENCE, SAFETY AND INCLUSION

Civil society participation cannot be assessed by the number of meetings or consultations held. The evidence suggests that participation may exist in form while remaining symbolic, selective or co-opted. The next phase of implementation should therefore **judge participation by its quality**. This entails assessing whether civil society can shape agendas, access information, receive feedback, participate safely, and engage through independent and diverse representation. It also applies to engagement in newer spaces shaping development cooperation, including public development banks, multilateral development banks, investment initiatives, private sector partnerships and regional bodies. If these spaces shape development priorities and resources, civil society needs meaningful access to them.



DIGITAL REPRESSION AND PUBLIC NARRATIVES ARE NOW CORE ENABLING-ENVIRONMENT ISSUES

Digital space is now central to civic life: surveillance, cybercrime laws, shutdowns, platform restrictions, online harassment, doxxing, AI-assisted monitoring and weak platform accountability affect expression, association, assembly, participation and protection. Public narratives are also part of the enabling environment with hostile narratives being used to delegitimise civil society and prepare the ground for legal restrictions, funding controls and attacks on human rights defenders. Civil society also needs support to communicate its role and value in ways that reach wider publics. The implication is that **DAC members should treat digital governance and public discourse as central to the Recommendation, not as secondary or technical concerns**.



IMPLEMENTATION NEEDS REGIONAL AND INTERSECTIONAL ADAPTATION

The same enabling-environment lens should be used across regions, but responses need to be context-specific. Restrictions take varied forms in different regions: securitisation, legal tightening, digital repression, land and environmental conflict, foreign-funding controls, protest restrictions, hostile narratives or donor withdrawal. They also affect groups differently: women-led organisations, Indigenous peoples, environmental defenders, migrants, youth, LGBTQIA+ groups, disability-led organisations, journalists, grassroots organisations and informal movements often face higher risk and lower access to support. This means implementation should ask: **who is funded, who is protected, who participates, who is visible, and who is excluded?**



COORDINATION ACTORS SHOULD BE RECOGNISED AS CIVIC INFRASTRUCTURE

National platforms, regional coalitions and civil society networks play a protective and strategic role.

They help detect risks, convene diverse actors, defend pluralism, connect local evidence to policy spaces, support collective advocacy and sustain civil society voice under pressure. They should not be treated only as intermediaries or consultation channels because they are part of the infrastructure that allows civil society to act collectively. This has implications across all three pillars of the Recommendation: civic space protection, support and engagement, and civil society effectiveness.





4. What this means for the OECD DAC: Recommendations for DAC Members

THE ANALYSIS in this report demonstrates that the OECD DAC Recommendation is **now more relevant than when it was adopted**, yet to have greater impact, it must **move from commitment to capability**. This means moving from the language of recognition and establishment of procedures and spaces for consultation, towards greater operational capability, early action and measurable impact.

To strengthen implementation and impact of the OECD DAC Recommendation, the Forus Network recommends that DAC Members:

1. ADOPT AN ENABLING ENVIRONMENT LENS TO ASSESS IMPACT

Civic-space deterioration is multi-dimensional and cumulative. Civic space restrictions are not only about direct violations of association, assembly and expression. They also happen through grey-zone restrictions: burdensome registration rules, foreign funding restrictions, AML/CFT measures, tax or reporting requirements, smear campaigns, digital surveillance, or symbolic participation processes.

Therefore, the implementation of the DAC Recommendation cannot be assessed only by whether DAC members have policies, tools or consultations in place. It needs to also assess whether their practices are helping civil society to operate independently, safely, sustainably and with influence. Using the enabling environment framework to understand and assess where threats or opportunities for civic space lie will help to avoid blind spots that can derive from a narrow focus on only one element or dimension.

Specific asks:

- Include grey zone and indirect restrictions, such as registration, reporting and taxation requirements, AML/CFT, banking access, foreign funding restrictions, cybercrime laws, public order laws and administrative burdens as civic space risks, and as part of regular monitoring.
- Connect this monitoring to the 6 dimensions of the enabling environment framework and embed the enabling environment framework into country strategies, results frameworks, peer reviews and toolkits and use it in dialogue with partner governments.
- Establish measurable and actionable standards around the core dimensions of an enabling environment and use these in funding and policy decision making.



“Implementation needs to also assess whether their practices are helping civil society to operate independently, safely, sustainably and with influence.”

2. ACT EARLIER AND IN A COORDINATED FASHION

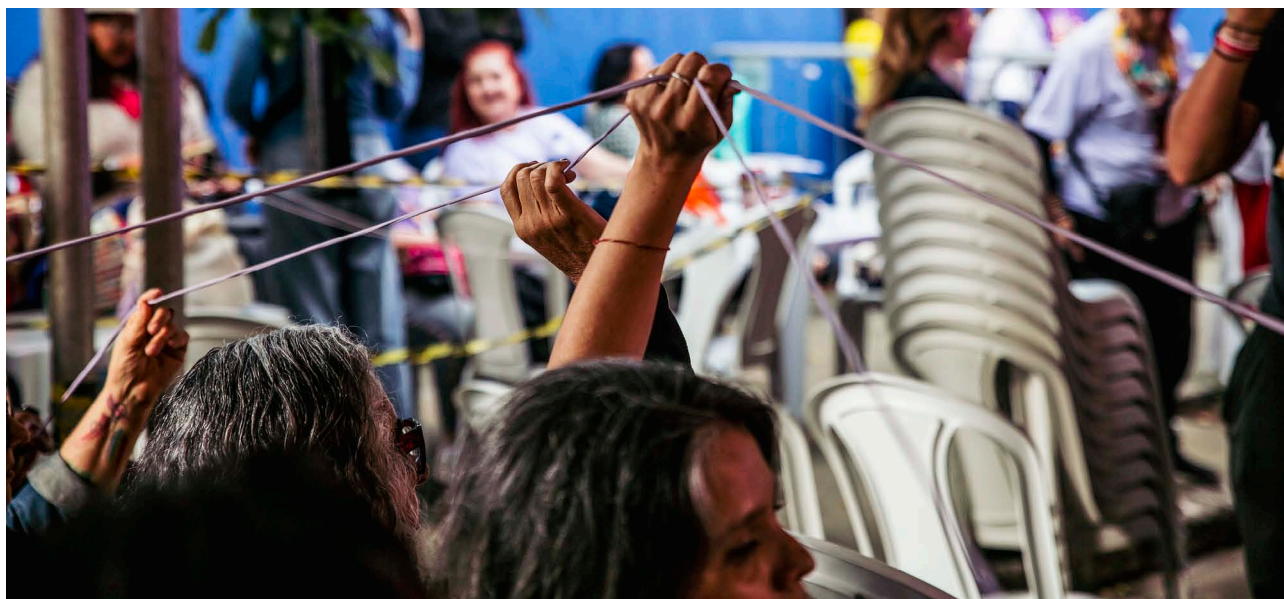
Faster intervention and response can provide important support to civil society, prevent situations from worsening and send clear signals to partner governments. What needs to improve is not only awareness, but speed and coordination: early warning without early action lets preventable restrictions harden into law.

Specific asks:

- Use early warning information, including evidence provided by civil society, to anticipate restrictions before they are adopted, respond accordingly and continue to support independent, civil-society-led monitoring and early-warning mechanisms, including initiatives such as EU SEE. Link early warning to diplomatic, financial, legal and protective responses.
- Give embassies explicit mandates and budget, treating civil-society monitoring and input (EU SEE, CIVICUS, V-Dem) as formal evidence and holding staff accountable for acting on alerts.
- Improve coordination between DAC members in responding to civic space alerts to make responses faster and more timely, and to learn from each other's practices.

What this could look like in practice

- Adopt a country-level early-warning ► early-action protocol, co-designed with local CSOs;
- Treat draft restrictive laws, lethal protest repression, shutdowns, surveillance, major funding withdrawals and judicial action against activists as triggers;
- Treat cumulative administrative and grey-zone burdens as early warning signals not waiting for bans or closures; and
- Agree a coordinated response within a specified period, e.g. 30 days of a credible alert (faster where violence or shutdowns occur) from a standing menu (joint démarche, quiet diplomacy, emergency legal or protection support, accelerated or flexible grants).



3. RESOURCE CIVIL SOCIETY TO SUSTAIN INDEPENDENT AND COLLECTIVE ACTION

Donor funding is not only about good donor practice, it is part of the infrastructure of an enabling environment and the protection of civic space. Funding and resourcing conditions determine whether civil society can survive, organise, monitor, advocate, protect communities and participate in public decision making. Coordination actors provide protection for smaller or local organisations, for advocacy and initiatives in support of the enabling environment. They are in a position to detect risks early, sustain collective action, connect local evidence to policy space and ensure civil society can engage safely, yet are often excluded when donors fund thematic delivery rather than coordination, representation and collective infrastructure.

Specific asks:

- Protect predictable, flexible, core, long-term, rights-based and accessible funding for civil society that prioritises risk sharing over risk transfer and supports localisation. Include funding for the organisational development, learning and accountability functions that sustain independent civil society action.
- Rebalance funding towards multi-year core and programmatic funding and reform funding and compliance systems in line with the commitment to locally led development.
- Ensure a ‘do no harm’ approach governs funding reduction: this means providing early communication and bridge funding, no abrupt exits in fragile contexts.
- Proactively fund coordination actors as part of supporting shared power, locally led action and ecosystem resilience.



What this could look like in practice

- Include time-bound, quality-controlled targets for a measurable rise in funding reaching partner-country CSOs directly.
- Simplify and harmonise reporting and administrative requirements, scale them proportionately;
- Open more direct pathways for local actors, and reduce over-reliance on large intermediaries;
- Remove internal rules that might mimic “foreign-agent” logic and affirm in funding guidelines that advocacy, watchdog and campaigning are eligible actions; and
- Make rapid-response funding accessible and responsive.

4. TREAT THE DIGITAL ENVIRONMENT AND DIGITAL REPRESSION AS A CORE CIVIC SPACE ISSUE, NOT A TECHNICAL ISSUE

Advocacy, collaboration, engagement and social interactions take place increasingly online, therefore the online civic space is as critical as physical or offline civic space. Technology has become an accelerator of fundamental-freedom and grey-zone restrictions and of delegitimising narratives — yet Pillar 1 still frames digital mainly as a tool for participation, sidestepping surveillance, platform control and online intimidation.

“Technology has become an accelerator of fundamental-freedom and grey-zone restrictions and of delegitimising narratives.”

Specific asks:

- Ensure implementation of the Recommendation addresses surveillance, platform control and online intimidation and make shutdowns, platform bans and cyber and online-safety laws early-action triggers.
- Provide sustained support for digital security, legal defence and online resilience through funding and policies.
- Engage earlier in political dialogue when digital restrictions appear.
- Develop more coherent digital governance policies towards tech providers and platforms, that focus on rights-based digital governance, technology and AI accountability, data justice and civil society participation in decisions over digital public infrastructure.

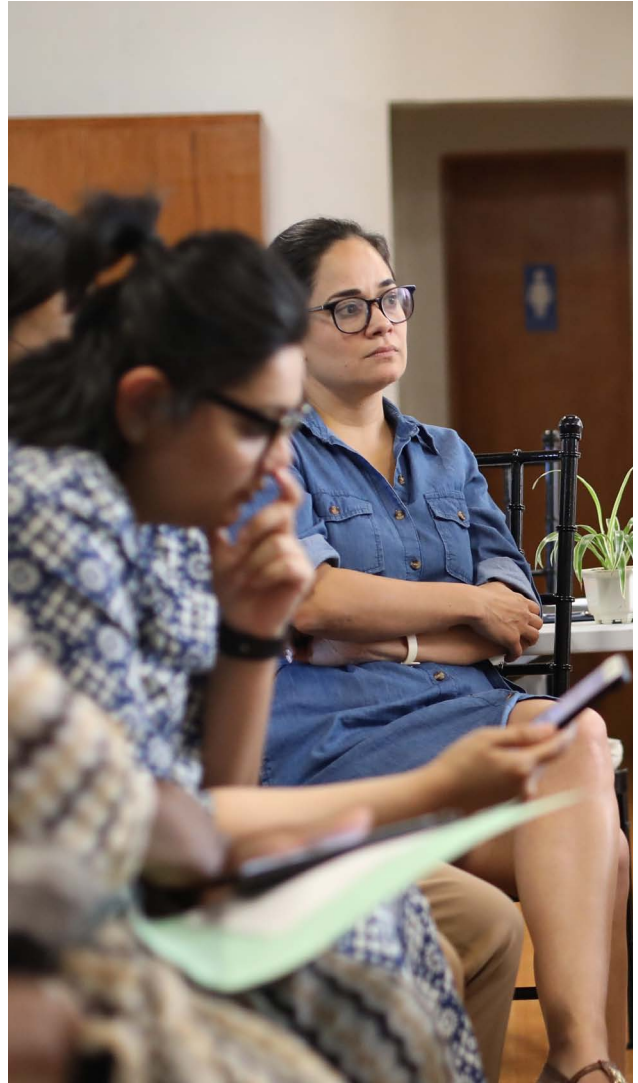


5. SUPPORT PUBLIC DISCOURSE AND NARRATIVES THAT PROTECT CIVIL SOCIETY

Narrative work should not be treated as communications work only. It is part of protecting the enabling environment because delegitimising narratives can prepare the ground for formal restrictions and contribute to a hostile climate.

Specific asks:

- Support positive public narratives about civil society and engage in public diplomacy that recognises civil society as a legitimate development, democracy, humanitarian and accountability actor.
- Support long-term narrative work that amplifies diverse voices.
- Invest in evidence-based communications, and rebuttal of smear campaigns when safe and appropriate.
- Provide funding for protection against delegitimation and defamation, including for legal defence, strategic litigation and anti-SLAPP measures.
- Increase support for areas such as: global citizenship education, development education, public-interest journalism, media literacy, fact-checking and counter-disinformation work.



“Narrative work should be treated as part of protecting the enabling environment.”

6. MEASURE PARTICIPATION BY INFLUENCE, NOT ATTENDANCE

The OECD DAC Recommendation asserts the importance of participation to enable civil society in development and humanitarian action. Participation opportunities need to be assessed by their quality, influence, feedback loops and safety, not only by the number of meetings or consultations held. Support for genuine participation and accountability mechanisms can shift the balance away from predominantly provider-driven compliance towards more locally owned accountability and greater resilience.



Specific asks:

- Institutionalise structured, inclusive, safe participation with demonstrable influence.
- Use their influence as DAC members to ensure that civil society has safe and meaningful participation in public development bank financing, investment compacts, Global Gateway-style initiatives, bilateral funding mechanisms and other development-finance instruments, including in design, risk assessment, implementation, monitoring and accountability.
- Improve provider side accountability and transparency in partnerships with CSOs so that priorities are shaped by local civil society actors and the communities they serve, rather than primarily by provider systems or intermediary organisations.
- Fund national and regional CSO platforms who are well placed to develop, promote and implement CSO-led accountability standards, and include funding for learning and collaborative infrastructures.

WHAT THIS COULD LOOK LIKE IN PRACTICE

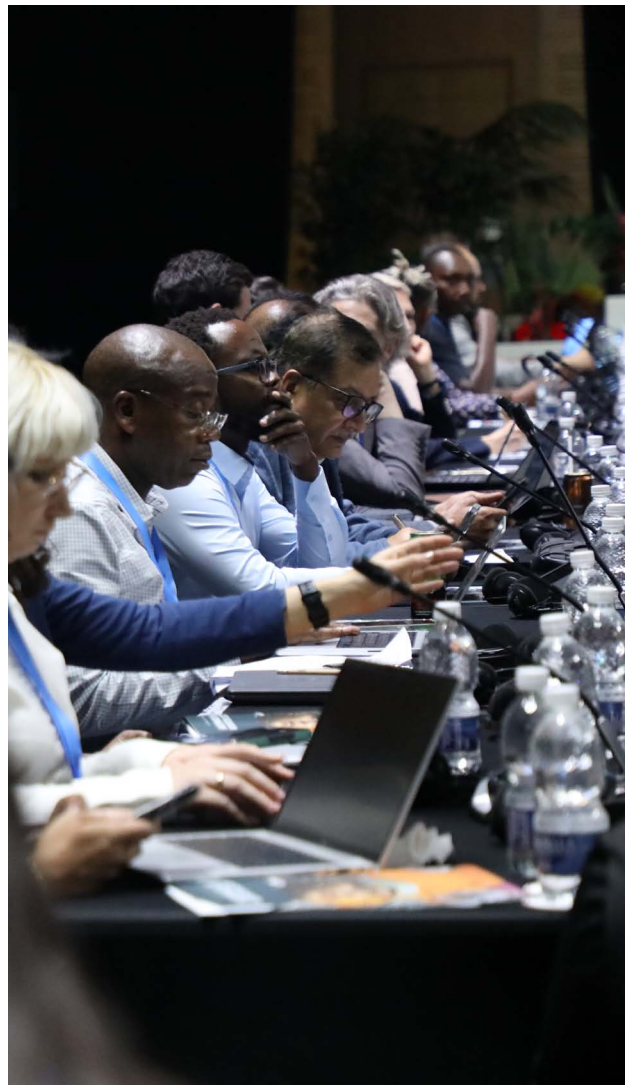
- Require feedback loops showing how CSO input changed policies, funding priorities, development-finance decisions and country strategies;
- Protect participation from co-optation by ensuring independent, diverse and critical actors - not only government-aligned or familiar interlocutors - can take part safely, funding the costs (translation, accessibility, travel) for marginalised and partner-country actors; and
- Recognise and support CSO-led accountability systems, such as the Global Standard for CSO Accountability, the Istanbul Principles and national platform codes of conduct as valid evidence of effectiveness.

7. STRENGTHEN WHOLE-OF-GOVERNMENT POLICY COHERENCE

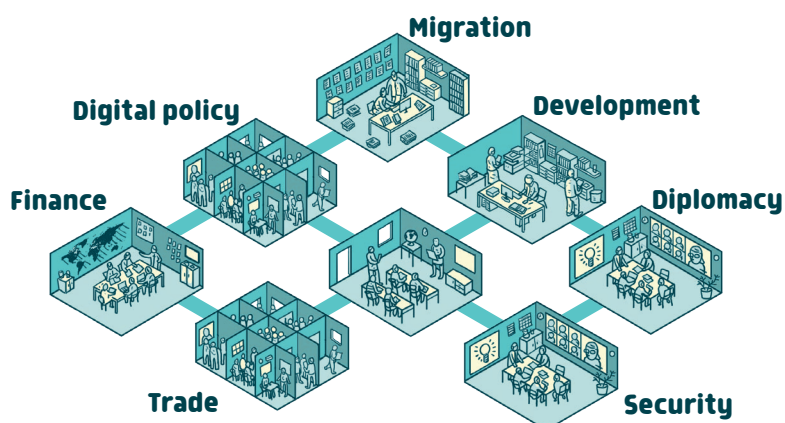
Civil society is affected as much by foreign, security, trade and migration policy as by development cooperation. As ODA shrinks and national-interest framing grows, coherence across these areas is increasingly essential.

Specific asks:

- Establish clear cross-ministerial coordination arrangements, with a designated focal point, to identify and address policy contradictions that affect civil society.
 - Run a civic space impact assessment before major cuts, exits or investment programmes;
 - Align AML/CFT, trade, migration and security measures so they do not undermine what the Recommendation is working towards.
 - Provide guidance to staff, diagnostic tools, staff training, performance incentives in support of policy coherence.
 - Bring civil society into development finance, public development bank and investment compact processes which are increasingly central to development cooperation and shaping civil society's enabling environment.
- Ensure that civil society has safe and meaningful participation in these spaces, including in design, risk assessment, implementation, monitoring and accountability.



WHOLE-OF-GOVERNMENT COHERENCE



“Civil society is affected as much by foreign, security, trade and migration policy as by development cooperation.”

ANNEX 1: The Enabling Environment Framework

1. Fundamental freedoms

This dimension is foundational because freedoms of assembly, association and expression are the minimum conditions that allow people and organisations to come together, speak publicly, mobilise, protest, document abuses and build independent civic action. When these freedoms are weakened, civil society cannot play its representative, watchdog, service or solidarity roles effectively, even where organisations still formally exist.



2. Legal and regulatory frameworks

The legal and regulatory framework matters because it determines whether civil society can exist, register, receive funds, hold events, communicate, partner with others and challenge state decisions without arbitrary interference. It is often the mechanism through which governments transform political hostility into durable restrictions. Even where direct bans are absent, burdensome administrative requirements can significantly shrink civic action.



3. Resources and funding conditions

This dimension is important because civil society's independence and resilience depend on access to diverse, predictable, flexible and sufficiently protective resources. Where funding is short-term, highly restricted, politically conditioned or abruptly withdrawn, organisations lose the capacity to retain staff, build relationships, take advocacy risks, sustain long-term community work and respond to threats. Resource conditions therefore shape whether civic freedoms can be exercised in practice.



4. Open and responsive state

This dimension matters because a healthy enabling environment requires more than the absence of repression. Civil society must also be able to engage the state meaningfully in policy design, implementation, monitoring and accountability. Without real responsiveness, consultation becomes symbolic, trust deteriorates and policies are less likely to reflect public needs, rights-based concerns or community realities.



5. Public discourse and narratives

Public discourse and narratives are important because they shape the legitimacy, safety and political room for civil society action. When CSOs are publicly portrayed as partisan, foreign-controlled, anti-national or elitist, this weakens public trust, makes attacks easier to justify and often prepares the ground for legal or financial restrictions. Narratives are therefore not secondary to policy; they are one of the operating conditions of civic space.



6. Secure digital environment

The digital environment is now central to civic life because organising, communication, evidence-gathering, fundraising, campaigning and public debate all depend on digital infrastructure. A secure digital environment is therefore essential not only for protection from harm, but also for the practical ability of civil society to operate, reach people and participate in public life. This dimension also increasingly includes questions of platform governance, responsible Artificial Intelligence and the accountability of technology companies. Understanding and addressing the interaction between the digital arena and different forms of media through which people acquire knowledge about public policy, civil society, and the priorities and needs of different population groups, is critical.



ANNEX 2: Selected published sources and evidence reviewed

This annex describes the published sources reviewed for the Report. The analysis also drew on confidential Forus and partner materials, consultation inputs and unpublished monitoring evidence. However, these are not individually listed for confidentiality reasons.

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Este informe también está disponible en español.

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For more information
contact@forus-international.org
www.forus-international.org

