ACTIVITY REPORT

"The National Multi-Stakeholder Dialogue,

"Talk to Your Regulators"



25th September 2026

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PROJECT TITLE: RISE ZAMBIA: STRENGTHENING LEGAL ADVOCACY, PROTECTION AND RESILIENCE OF CSO'S IN ZAMBIA.

Submitted to: International Centre for Not-for-Profit-Law(ICNL)

and Norwegian Church Aid (NCA)

Submitted by: Zambia Council for Social Development (ZCSD)

1. Introduction

The National Multi-Stakeholder Dialogue, *"Talk to Your Regulators,"* was facilitated by the Zambia Council for Social Development (ZCSD) on 25 September 2026 at Twangale Resort, Lusaka. The activity was led by Mwaba Emmanuel Nonde, Programmes Officer at ZCSD, and targeted CSOs in Lusaka and outside Lusaka.

The meeting provided a structured platform for CSOs to engage directly with regulatory institutions on issues affecting the protection and resilience of civil society organizations in Zambia. Its main objective was to facilitate constructive engagement between civil society and regulatory institutions and to identify practical measures that could improve the operating environment for CSOs, particularly in light of the proposed NGO Bill No. 6 of 2025.

The meeting also provided an opportunity to share findings from the Civic Space Preparedness Study conducted by ZCSD with support from the International Centre for Not-for-Profit Law (ICNL) and Sida.

2. Attendance.

The meeting brought together representatives from CSOs, regulatory institutions, the National Assembly and the Council of NGOs. 20 male 10 female attended the meeting out of which 12 NGO representatives were youths. The one day session was moderated by Mr. Simon Kapilima, who a is Consultant in the civil society sector. Mr. Kapilima worked with the Ministry Of Gender and has also been providing consultancy to the civil society sector on matters relating to human rights, employment law, and other governance crosscutting issues.

2. Objectives of the Activity

The dialogue was convened under the RISE Zambia Project with the following specific objectives:

1. To create a structured platform for direct engagement between CSOs and key regulatory institutions on the legal and regulatory environment affecting civil society operations.
2. To share and discuss findings from the Civic Space Preparedness Study and use the evidence to inform dialogue on regulatory challenges and possible reforms.
3. To improve CSOs' understanding of the current and proposed legal framework governing their operations, including NGO Bill No. 6 of 2025.
4. To identify practical measures that can improve compliance, strengthen protection, and promote a more predictable and enabling regulatory environment for CSOs in Zambia.
5. To strengthen the capacity of CSOs to engage regulators with documented evidence and clear advocacy priorities.

Activity Implemented:

National Multi Stakeholder Dialogue – " Talk to your Regulators"

Under the RISE Zambia Project, ZCSD convened the National Multi-Stakeholder Dialogue, "Talk to Your Regulators," to strengthen the legal preparedness, protection and resilience of civil society organisations in Zambia. The activity was designed to provide a structured platform for CSOs to engage directly with relevant regulatory institutions on the legal and regulatory environment affecting their operations, particularly in light of the proposed NGO Bill No. 6 of 2025.

The dialogue sought to move engagement between CSOs and regulators beyond general concerns by using evidence from the Civic Space Preparedness Study to inform discussions on specific regulatory challenges and possible reforms. It also aimed to improve CSOs' understanding of the legal framework governing their operations, identify practical measures to improve compliance, and create opportunities for constructive engagement on the protection of civic space.

Consistent with the objectives of the RISE Zambia Project, the activity sought to strengthen the capacity of CSOs to engage regulators with documented evidence and clear advocacy priorities. It also provided an opportunity to discuss the need for a predictable and enabling regulatory environment that supports accountability while safeguarding the ability of civil society organisations to operate effectively.

2.1 Opening Remarks

The meeting was officially opened by the Programmes Manager of ZCSD, Mr Zebbies Mumba, who welcomed the participants and provided an overview of the day's programme and expected outcomes. He emphasised that the purpose of the meeting was to strengthen the resilience and capacity of Civil Society Organisations (CSOs) to engage constructively with regulators.

2.2 Keynote Address

The keynote address was delivered virtually by Professor Daniel Hammett of the University of Sheffield. His presentation focused on the current global civic space landscape, with particular attention to trends in financing and collaboration for sustainable CSO networking.

Professor Hammett described CSOs as institutions established to pursue actions that serve the common good and noted their contribution to service delivery in areas in areas such as education, health and land rights advocacy.

He highlighted several global trends affecting CSOs, including reductions in public spending and increased operational costs between 2024 and 2025. These developments have contributed to the shrinking civic space within which CSOs operate.

Regarding CSO regulation, Professor Hammett pointed to the increase in legislation worldwide requiring CSOs to obtain licenses to operate. He further highlighted the growing use of restrictions on freedom of association, expression and assembly, alongside increased government surveillance of organizations. These restrictions are often presented as trade-offs between freedom and security.

He also referred to the continued decline in civil society and open civic space ratings. Citing CIVICUS research, he noted that only 39 of 198 countries and territories worldwide had an open civic space rating, while 83 countries had repressed or closed civic space, indicating restrictions on fundamental freedoms.

2.3: Presentation on Zambia's Civic Space and Legal-Policy Environment

The meeting provided an opportunity for ZCSD to present an overview of the NGO regulatory environment in Zambia, key issues emerging from the Civic Space Preparedness Study, and the importance of constructive engagement between CSOs and regulatory institutions.

The presentation was delivered virtually by Mr Daniel Libati, the consultant who conducted the Civic Space Preparedness Study.

Overview of the Legal and Regulatory Framework

Mr. Libati began by providing an overview of the legal and regulatory framework governing CSOs in Zambia. He highlighted the different pieces of legislation under which organisations may be established and regulated, including the Companies Act, Societies Act and NGO Act.

He also outlined the roles of the various regulatory institutions responsible for ensuring CSO compliance, including the Registrar of Societies, Registrar of NGOs, Patents and Companies Registration Agency (PACRA), Zambia Revenue Authority (ZRA), National Pension Scheme Authority (NAPSA) and National Health Insurance Management Authority (NHIMA).

Key Issues Emerging from the Civic Space Preparedness Study

Mr.Libati highlighted limited awareness among CSOs of the evolving NGO regulatory framework, particularly the provisions and potential implications of NGO Bill No. 6 of 2025.

He noted that although some CSOs were aware of the Bill, understanding across the sector remained limited regarding its implications for registration, licensing, reporting, self-regulation, accountability and compliance.

He also raised concerns about the clarity of some proposed regulatory requirements. Mandatory obligations relating to registration, licensing, reporting and compliance needed to be clearly defined to avoid uncertainty and ensure that CSOs understood what was expected of them.

Mr Libati emphasised that the regulatory framework should provide clear and predictable requirements that enable organisations to comply effectively.

Another concern related to the penalties proposed under NGO Bill No. 6 of 2025. Mr Libati proposed that the regulatory framework should provide proportionate procedural and administrative penalties for non-compliance rather than penalties that could have a disproportionate impact on CSOs.

Mr. Libati further emphasised the importance of ensuring that laws and regulations governing civic space were consistent with Zambia's obligations under the International Covenant on Civil and Political Rights (ICCPR) and other relevant human rights standards.

The presentation also highlighted the need for simplified and accessible regulatory guidelines to help CSOs understand the legal and administrative requirements applicable to them, improve compliance and reduce uncertainty about the regulatory environment.

2.4 Presentation on the Council of Non Governmental Organisations and the NGO Legislative Reform Process

The final presentation provided an overview of the NGO regulatory framework and the ongoing process of reforming the legal framework governing NGOs in Zambia. It was delivered by Mr Roy Mwilu, Chairperson of the Council of Non-Governmental Organisations (CNGOs).

Mr Mwilu explained that the CNGOs is a statutory body established under the NGO Act No. 16 of 2009, under the Ministry of Community Development and Social Services. The Council serves as a collective forum for registered NGOs through the Zambia Congress of NGOs and is responsible for facilitating and coordinating the effective operation of NGOs, promoting compliance with the NGO Code of Conduct and contributing to the safeguarding of civic space.

He outlined the structure of the CNGOs, noting that a 12-member Council is elected to manage the affairs of the Congress. He also provided an overview of the first Zambia Congress of NGOs, held in December 2012, where councillors were elected along thematic lines, and the second Congress, held in October 2018, where councillors were elected on a provincial basis.

Mr Mwilu highlighted the vision of the CNGOs, which seeks to promote a vibrant, resilient, inclusive, well-coordinated and responsive NGO sector in Zambia.

Benefits of CNGOs Membership

Mr Mwilu highlighted the benefits associated with membership of the CNGOs, including access to capacity-building opportunities, recognition and reference letters and certificates, participation in stakeholder meetings, access to information and publicity platforms, and participation in sector networks.

He noted that approximately 2,400 NGOs had been recorded by the Ministry of Community Development and Social Services' Department of Registrar for NGOs as of 2026, demonstrating the scale and diversity of the NGO sector and the importance of effective coordination.

History of the NGO Legislative Reform Process

Mr Mwilu provided a historical overview of efforts to repeal and replace the NGO Act No. 16 of 2009. He explained that efforts to reform the legislation had been ongoing since 2012 and had involved several rounds of consultation and legislative processes.

He noted that NGOs had brought legal challenges around 2013, while the Government subsequently acknowledged the need to review the existing legal framework. The Zambia Law

Development Commission (ZLDC) later undertook consultative processes that contributed to the development of successive versions of the NGO Bill in 2020, 2024 and 2025.

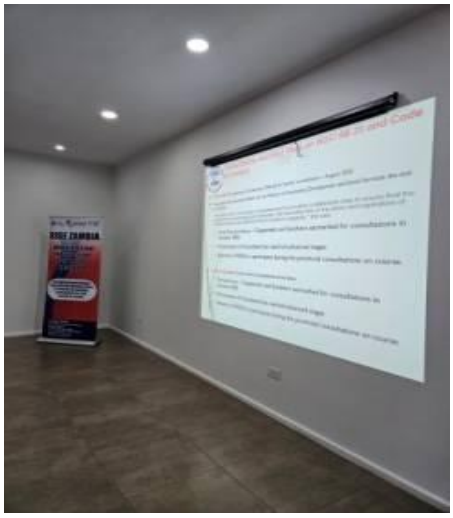
He explained that the process had experienced several delays due to concerns raised by NGOs and CSOs regarding provisions perceived as potentially restrictive of civic space. The process had also been affected by the need for broader consultation and consensus, legal challenges and court injunctions, and the need to ensure consistency with constitutional requirements and other legislation relating to anti-terrorism, anti-money laundering and countering proliferation.

Additional factors included administrative challenges, changes in leadership and staff attrition. Some provisions had also generated significant concern among stakeholders, particularly those relating to mandatory re-registration, fees, reporting and audit requirements, increased oversight and punitive measures.

Current Status of NGO Bill No. 6 of 2025

Mr Mwilu explained that NGO Bill No. 6 of 2025 had undergone its first reading in Parliament before being deferred in August 2025 to allow for further consultations. The deferment was intended to provide an opportunity for broader stakeholder engagement and ensure that the legislation was inclusive and responsive to concerns raised by stakeholders in the NGO sector.

He informed participants that provincial consultations were planned to begin in the Copperbelt and Southern Provinces in October 2026. The procurement of a consultant was at an advanced stage, while the identification of participating NGOs was ongoing. He also noted that a draft Code of Conduct existed and that consultations on the Code would be undertaken alongside the review of the NGO Bill.



Mr Mwilu provided an overview of the current leadership structure of the CNGOs, highlighting the role of provincial forum leaders in coordinating and representing NGOs within the sector. The current leadership included the Chairperson and Vice Chairperson, together with provincial representatives.

He further highlighted the next steps in the legislative reform process, including completing the planned provincial consultations and validation process, incorporating stakeholder inputs into the Bill, and subsequently

resubmitting the refined Bill to Parliament for consideration.

He noted that, once a new NGO Act was enacted, a new Zambia Congress of NGOs would need to be convened in accordance with the new legal framework.

The presentation emphasised the importance of constructive and sustained engagement between government, regulators and CSOs throughout the legislative reform process. Mr Mwilu stressed that meaningful participation by NGOs and other stakeholders would help ensure that the eventual regulatory framework addressed the realities of the sector while promoting accountability and maintaining an enabling environment for civil society.

Overall, the presentation provided participants with a historical and current overview of the NGO legislative reform process, clarified the status of NGO Bill No. 6 of 2025, and highlighted the importance of continued stakeholder participation, inclusive consultation and constructive dialogue in shaping the future regulatory framework governing NGOs in Zambia.

2.5. Feedback from Participants

The meeting provided an opportunity for participants to raise questions and share concerns regarding the regulatory environment for CSOs in Zambia.

Concern regarding engagement with the Zambia Revenue Authority (ZRA)

A participant raised a concern that ZRA was one of the most complicated regulators and could be difficult to approach. In response, the ZRA representative explained that the institution had a department specifically dedicated to attending to the CSO sector, both at headquarters and in provincial districts. She clarified that the perceived difficulty was not a major issue and encouraged CSOs to contact ZRA officials across the country and share their concerns.

Concerns regarding punitive penalties under existing legislation

Participants raised questions about how CSOs could address punitive penalties contained in the law. The consultant responded that CSOs should be addressed through administrative channels, with corrective measures being preferred over criminal sanctions.

Division within the NGO sector regarding NGO Bill No. 6 of 2025

Participants questioned why divisions existed within the NGO sector, particularly where some NGOs advocated for the repeal and replacement of NGO Bill No. 6 of 2025 despite having participated in the process that led to its development.

In response, it was explained that although CSOs had participated in the process, additional provisions had been included in the draft beyond those previously agreed upon. Another response suggested that some CSOs viewed themselves as more influential than others and opposed the Bill because it did not reflect the positions they wanted.

Participants also agreed that where NGOs could not reach an overwhelming consensus on particular issues, those issues should be put to a vote, with the majority decision carrying the minority along.

Concerns regarding CSOs' reluctance to openly discuss the NGO Bill

The issue of some CSOs isolating themselves when discussions about the Bill arose was also raised. One respondent suggested that some CSOs were state-sponsored and therefore reluctant to openly criticise the Government.

2.6 Closing Remarks

In her closing remarks, delivered virtually, the Executive Director of ZCSD, Ms Leah Mitaba, thanked all participants and speakers for taking the engagement seriously.

She expressed appreciation to Mr Daniel Libati for the research consultancy work undertaken, noting that the study provided NGOs with more information about the challenges surrounding the enactment of the NGO Bill.

The Executive Director also acknowledged that the collaboration between ZCSD and NCA had enabled NGOs from other districts to participate in the stakeholder meeting. She thanked NCA for supporting the process. Ms Mitaba further noted that the international perspective on civic space regulation shared by Professor Daniel Hammett conveyed an important message of solidarity to the NGO sector in Zambia and provided hope for a better future despite changing funding trends affecting NGOs.

She thanked the regulators who participated in the meeting and noted that NGOs were ready to strengthen compliance. Regarding the participation of the Council of NGOs representative, she observed that the presentation by the Council Chairperson had provided important awareness of the existing legislation and the situation following the deferment of NGO Bill No. 6 of 2025.

She reaffirmed ZCSD's readiness to continue working with other NGOs to ensure that collective efforts contributed to the repeal and replacement of the NGO law.

3 Outcomes and Impact Achieved Through the Activity

- **Increased awareness and knowledge.** Participating CSOs gained improved understanding of the current status of NGO Bill No. 6 of 2025, the roles of various regulators, and key findings from the Civic Space Preparedness Study. Participants agreed that greater awareness across the wider CSO sector remains necessary.
- **Direct engagement between CSOs and regulators.** Representatives from the National Assembly, Zambia Revenue Authority (ZRA), and Patents and Companies Registration Agency (PACRA) attended and interacted with CSOs. Regulators present encouraged CSO leaders to contact them directly regarding compliance challenges.
- **Clarification of the legislative reform process.** Participants received a clear update on the history, current status, and planned next steps of the NGO Bill reform process, including the planned provincial consultations beginning in October 2026.
- **Identification of practical advocacy avenues.** Participants were informed of concrete mechanisms to influence the legislative process, including writing to parliamentary committees to request scrutiny of NGO Bill No. 6 of 2025.
- **Strengthened recognition of the need for sector coordination.** Discussions highlighted the importance of addressing internal divisions within the NGO sector and the value of collective, evidence-based engagement with government and regulators.

The activity directly contributed to the RISE Zambia Project objective of strengthening the legal preparedness, protection, and resilience of CSOs by creating a structured space for evidence-based dialogue and relationship-building between civil society and regulatory institutions.

6. Recommendations

Based on the presentations and discussions, the following recommendations emerged:

- **Awareness and information sharing.** ZCSD and partner NGOs should continue and expand efforts to publicise and explain the provisions of NGO Bill No. 6 of 2025 so that a larger number of organisations understand its implications.
- **Regulatory clarity and proportionality.** The regulatory framework should provide clear, predictable requirements and favour proportionate administrative and corrective measures over punitive or criminal sanctions for non-compliance.
- **Simplified guidance.** Simplified and accessible regulatory guidelines should be developed to help CSOs understand and meet legal and administrative requirements.
- **Constructive engagement with parliamentary processes.** CSOs should proactively engage parliamentary committees by formally requesting scrutiny of NGO Bill No. 6 of 2025 and related legislation.

- **Inclusive consultation.** The ongoing provincial consultations and validation process on the Bill should be genuinely inclusive and should incorporate the concerns and proposals of a broad range of CSOs.
- **Sector coordination.** The NGO sector should strengthen internal coordination and, where full consensus cannot be reached, use transparent majority decision-making processes so that collective positions can still be advanced.

7. Challenges and Lessons Learned

- Several key regulators (Registrar of Societies, NHIMA, and NAPSA) did not attend the meeting, limiting the breadth of direct engagement.
- Significant differences of opinion remain within the NGO sector regarding NGO Bill No. 6 of 2025, which can weaken collective advocacy if not carefully managed.
- Many CSOs still have limited detailed knowledge of the proposed Bill, confirming the need for sustained information dissemination.
- Structured, evidence-based platforms such as this dialogue are valuable for building mutual understanding between CSOs and regulators, but they need to be followed by concrete joint actions.

8. Next Steps and Follow-up

- ZCSD, in collaboration with participating NGOs, will continue publicising and explaining NGO Bill No. 6 of 2025 to the wider CSO sector.
- ZCSD will explore opportunities to support or participate in the planned provincial consultations on the Bill beginning in October 2026.
- CSOs will be encouraged to engage parliamentary committees formally on the Bill.
- ZCSD will maintain dialogue with regulators who participated and seek opportunities to engage those who were absent.
- Findings and recommendations from this dialogue will inform ongoing advocacy under the RISE Zambia Project.

9. Conclusion

The National Multi-Stakeholder Dialogue “Talk to Your Regulators” provided a valuable platform for civil society organisations, regulatory institutions, and other stakeholders to discuss the legal and regulatory environment affecting CSOs in Zambia. Through presentations on the Civic Space Preparedness Study, global civic space trends, and the ongoing reform of the NGO legal

framework, participants gained important insights into the challenges facing civil society and practical avenues for engagement.

The discussions reinforced the need for greater awareness of the proposed legislation, stronger coordination among CSOs, and sustained constructive engagement with regulators and parliamentary processes. Overall, the activity contributed meaningfully to the objectives of the RISE Zambia Project by strengthening stakeholder engagement and creating space for evidence-based dialogue on issues affecting civic space in Zambia.

ZCSD remains committed to supporting collaborative advocacy and dialogue aimed at strengthening the legal preparedness, protection, and resilience of civil society organisations in Zambia.

10. Annexes

Annex 1: Photo Documentation

Some of trhe participants of the Multi- Stakeholders Workshop held at Twangale Resort in Chilanga on 25th September 2026 pause for a group photo-ZCSD 2026



A Presentation and Discussion Session in progress during the Multi Stake holders Engagement Meeting at Twangale Resort on 25th September - ZCSD2026





With Support from: