



# Understanding Civic Space in Southern Europe

Trends and Challenges to Civil Society Organisations and Human Rights Defenders in Bulgaria, Cyprus, Greece and Italy





## **Regional Overview**

Over the past decade, civic space in Southern Europe has undergone profound transformations, influenced by political shifts, economic crises, and evolving societal attitudes. Analyses from Bulgaria, Cyprus, Greece, and Italy indicate common trends and distinct national challenges affecting civil society organizations (CSOs). These include regulatory constraints, financial instability, and polarized public discourse, which impact the ability of CSOs to operate effectively and engage with the public.

**Legal & Political Pressures:** Governments have introduced legal frameworks that regulate but also, in some instances, restrict CSO operations. Some laws impose excessive bureaucratic hurdles or selectively target NGOs working in specific domains such as migration, human rights, and social justice.

**Financial Constraints:** Limited access to state funding, restrictive banking policies, and growing administrative costs are persistent issues, particularly for grassroots organizations that lack institutional backing.

**Polarized Public Perceptions & Media Discourse:** While CSOs play a crucial role in democratic participation, public trust is often undermined by disinformation, political manipulation, and media narratives that question their legitimacy or portray them as foreign-influenced entities.

**Digital & Physical Threats:** Activists and CSOs have increasingly faced digital smear campaigns, cyber-attacks, and even physical intimidation in certain cases, reducing their operational security and effectiveness.

# A Comparison of Challenges

	Bulgaria	Cyprus	Greece	Italy
Legal Restrictions	Restrictive laws on LGBTQ+ activists; proposals to label CSOs as 'foreign agents'	Complex compliance legislation, de- registration threats	Restrictive legislation on CSOs working with migrants	Restrictive legislation on CSOs working with migrants; restricts on media freedom & critical reporting
Administrative Barriers	Stricter financial reporting rules (EU anti-money laundering package)	Strict financial reporting rules and operating standards; lengthy approval processes, lack of clear guidelines	Opaque registration processes and bureaucratic burdens for CSOs	Lengthy procedures, excessive administrative audits
Funding Constraints	Limited public funding, overreliance on foreign donors and EU-funding	NGOs classified as 'high-risk' by banks, funding delays; complex procedures for obtaining fundraising	Financial instability; lack of transparency in funding decisions	Limited public funding, especially for CSOs addressing migration and environmental issues
Smear Campaigns	Frequent targeting of CSOs by pro- Kremlin media and far-right groups; labeling CSOs as 'foreign agents'	CSOs often framed as corrupt, foreign- funded entities or politically motivated	Negative portrayals of CSOs working with migrants	CSOs (esp. in migration and environmental sectors) often framed as undermining national sovereignty
Digital Harrasment	Online harassment, disinformation, SLAPPS (esp. against environmental CSOs), cyberattacks	Online harassment, suppression of CSO-related content, SLAPPS, restrictions on media freedom	Online harassment, disinformation, SLAPPS, restrictions on media freedom	Online harassment, disinformation and restrictions on media freedom, cyberattacks
Public (Dis)trust	47% regard CSOs as reliable entities, but skepticism remains high	59% of Turkish Cypriots have a positive view on CSOs, but skepticism persists	68.7% of Greeks have a positive evaluation of CSOs, but awareness of their work remains low	50% of Italians perceive CSOs as a reliable, but migration-focused and environmental CSOs face hostility
Physical Threats	Sporadic physical attacks on activists (esp. LGBTQ+) by far- right groups	Few reports of physical threats, but rather hostile environment	Threats and attacks against activists (esp. working on migration) by farright groups	Reports of physical threats, racist abuse, and misogynistic attacks

# **Necessary Steps**

# Bulgaria

Bulgaria's civic space is shrinking. Despite evolving since 1989, particularly after EU accession in 2007, with currently, over 26,000 NGOs registered, only about 9,000 are active. Moreover, participation remains low, with only 25% of the population engaged in NGOs.

Bulgaria's political instability has further weakened the key institutions responsible for upholding the rule of law and has diminished institutional support for civil society.

Civic space in Bulgaria is further characterized by regional disparities, with most NGOs concentrated in Sofia and rural areas lacking institutional support. At the same time, recent years have witnessed intensified disinformation campaigns, social polarization and restrictive legislation.

## Establishing a Structured Review of CSO Data and Sectoral Analysis:

The Bulgarian government should establish a dedicated institutional review body responsible for periodic review, evaluation, and reporting on the state of the sector.

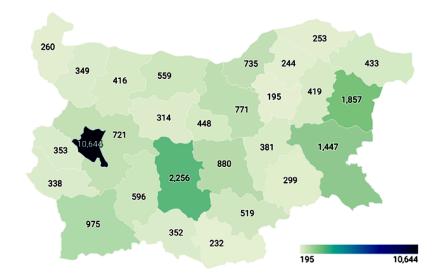
## Develop a National Early Warning and Monitoring Mechanism for Civil Society Threats:

The EWM should feature risk assessment models, an action plan for rapid intervention and serve to provide the necessary situational awareness to inform new policies that empower civic space.

#### Counter Disinformation and Foster Public Trust in Civil Society:

Launching public awareness campaigns to highlight the positive impact of CSOs would help dispel misleading narratives and promote civic engagement.

Extremely high concentration of CSOs/NGOs in the capital and metropolitan areas of Bulgaria.



**Regulatory Framework:** Key legal documents like the Non-Profit Legal Entities Act provide fundamental mechanisms for public engagement and participation of CSOs. However, these are often underutilized or due to political instability, administrative inefficiencies, and a lack of systemic enforcement.

Restrictive Legislation: The rise of far-right parties has led to legislative threats, including a Foreign Agents Registration Act, which seeks to label foreign-funded NGOs as "agents". Laws restricting LGBTQ+representation in education (2024 "anti-LGBTQ+propaganda law") have led to a surge in hostility toward gender rights organizations.

**Financial Barriers:** The financial viability of NGOs has been declining since 2014. 59% of NGOs report that lack of funding is their biggest challenge. NGOs rely heavily on foreign donors, making them targets of political attacks. Limited state funding and administrative barriers prevent financial sustainability.

Lack of Systematic Monitoring: No clear mandate within any institution for tracking the activities and of CSOs challenges exists, exacerbating their vulnerability. The Council for Civil Society Development was established to support and monitor CSOs' activities, but it remains ineffective.



# Societal Attitudes & Their Impact on Civic Space

Low Public Trust in CSOs: Only 40% of Bulgarians express trust in CSOs, and 47% have positive views on their work. Disinformation and political rhetoric contribute to public suspicion, particularly regarding foreign-funded organizations. In rural areas, CSOs are often viewed with higher distrust and seen as elitedriven entities disconnected from local concerns. Accordingly, Bulgaria has ranked among the lowest in Europe in public trust in government institutions.

**Far-Right Mobilisation:** The rise of nationalist, Eurosceptic, and pro-Kremlin parties has introduced a more aggressive stance against CSOs. Newly emerging conservative and far-right organizations have played a key role in mobilizing distrust against NGOs, working for human rights.

#### Disinformation and Propaganda Against NGOs:

Bulgaria ranks 59th in the 2024 World Press Freedom Index, indicating persistent press freedom challenges. Russian hybrid influence tactics have intensified since the Ukraine war, targeting civil society actors with misinformation campaigns. Far-right media narratives and nationalist political actors often frame CSOs advocating for human rights, European integration, and minority rights as foreign agents of Western influence, destabilizers, or ideological threats undermining national identity.

Legislative attempts to brand NGOs as "foreign agents" (modeled after Russian and Hungarian laws) have contributed to public suspicion.

# Smearing Campaigns & Cyber Threats

#### **Escalating Smear Campaigns and Physical Attacks:**

Over the past four years, CSOs have increasingly been targeted by organized smear campaigns and violent attacks, often orchestrated by far-right groups. Organizations advocating for human rights, democracy, and minority protections are particularly vulnerable to public vilification.

**Cyber bullying and aggression:** An increasing number of NGOs claim being the victim of phishing attempts, data breaches, and digital surveillance.

**Strategic Lawsuits Against Public Participation** 

(SLAPPs): Journalists and civil society activists (especially environmental) are frequently targeted by defamation lawsuits intended to silence them. In 2023, a record number of lawsuits were filed against investigative journalists exposing government corruption. Courts are often slow in dismissing SLAPP cases, allowing prolonged legal battles that drain CSO resources.

# **Necessary Steps**

# Cyprus

The civic space in Cyprus is increasingly restricted, particularly in recent years. One major shift has been a move away from organised CSOs to working more with informal groups or individuals, particularly in areas where organised entities are scarce. This trend reflects both the shrinking operational space for CSOs and the difficulties they face in registering and sustaining themselves.

Government policies favour large organisations, often at the expense of smaller or grassroots initiatives. At the same time there is a strong interest in bicommunal efforts, especially among youth and newer activists, who view civil society as a potential avenue for addressing shared concerns across the divide.

Civic space in Cyprus is further characterized with geographical disparities. While some areas, like the capitol city Nicosia remain hubs of civil society activity, rural and peripheral regions experience significant limitations.

# Establish a Standardized Guidelines and Procedures for CSO registration:

The Cypriot government should establish a clear procedures for CSO registration and operations, ensuring district offices implement regulations consistently through a dedicated manual.

#### Differentiate CSOs in Banking and Improve Financial Support:

Introduce separate classification for CSOs in banking regulations, ensure transparent communication from banks, and simplify state funding and fundraising procedures.

#### Institutionalize CSO Participation and Public Awareness:

Mandate CSO involvement in policymaking, launch awareness campaigns on their societal contributions, and educate government bodies on their role and impact.

Government policies favour large organisations, often at the expense of smaller or grassroots initiatives.



**Legal pressures:** The legal framework for CSOs in Cyprus remains highly regulated and bureaucratic. The 2017 Law on Associations introduced two new legal structures but imposed stricter compliance rules. The 2020 amendment to the Trade Unions Law led to the de-registration of several CSOs. This amendment imposes strict administrative requirements, including a short two-month compliance deadline, which leads to the dissolution of the organisation if not met.

Administrative Pressures: The government has passed legislation requiring CSOs to maintain transparent accounting methods and strict operating standards, although these regulations are often perceived as being punitive rather than supportive. Smaller organisations, encounter barriers to meeting these objectives that, such as delays in government procedures or applications.

Challenges regarding funding: Banking restrictions classify CSOs as high-risk, leading to difficulties in opening/operating accounts, unexpected freezing of accounts without prior warning and delays in processing financial transactions, impacting funding. Government oversight is increasing, requiring strict financial transparency and operational standards, disproportionately affecting small organisations. limited and delayed state funding, high administrative costs (e.g., audits) and complex procedures for obtaining fundraising approval.

Lack of clear protection measures: There are no comprehensive legal protections aimed at protecting CSOs from arbitrary administrative harassment and political pressure.



# Societal Attitudes & Their Impact on Civic Space

#### Moderate to positive public attitudes towards CSOs:

59% of Cypriots have a positive view of CSOs, and 52% believe they have a positive impact on society. CSOs are predominantly associated with philanthropy, voluntarism, and democracy and education, health, and social services are seen as their most successful areas. ·Certain advocacy-based CSOs (e.g., human rights, LGBTQ+ rights, and migration-focused organisations) face heightened scrutiny and scepticism and are actively opposed by conservative and nationalist groups.

Public discourse is highly fragmented: Media portrayal often focus on negative stories, framing CSOs as ineffective, corrupt, or foreign-funded entities. Scepticism persists about whether civil society organisations serve public interests or act as extensions of foreign influence. CSOs are often described as politically motivated or as competitors for public funding, limiting their ability to engage communities effectively.

# Smearing Campaigns & Cyber Threats

A troubling online environment: Disinformation campaigns target CSOs, discrediting their work and undermining their legitimacy. Social media algorithms often suppress CSO-related content, limiting outreach and engagement. Activists working on migration, LGBTQ+ rights, and transparency issues face harassment and cyber bulling.

**Strategic Lawsuits Against Public Participation (SLAPPs):** Another major concern is the threat towards press freedom. These revisions criminalise media material, which shows criticism, ridicule, or dissent against the authorities with penalties up to five years in prison.

# Greece

Civil society is regarded as traditionally weak in Greece, with low levels of volunteering and associational membership. Political parties influence labor and student unions, limiting independent civic engagement. Grassroots initiatives have grown despite structural challenges, often operating outside formalized NGO frameworks.

The space in which civil society operates in Greece remains challenging. The European Commission has expressed concerns regarding the situation of civil society in last year's Rule of Law report. Restrictive laws, funding challenges, and hostile public narratives create a difficult environment for CSOs.

While the number of CSOs seems to are increasing and public's attitudes towards have in recent years become more trusting and aware of their contribution and efforts, sceptisism towards some CSOs remains a challenge.

Both verbal and physical attacks against CSOs and human rights defenders, especially those working on migration, have continued in recent years.

#### **Enhance Dialogue Between CSOs and the State:**

The Greek government should establish formal channels for ongoing dialogue between NGOs, the government, and society to improve cooperation and policymaking.

#### **Simplify Bureaucratic Procedures for CSOs:**

The Ministry of Interior should simplify bureaucratic procedures for CSO registration, reporting, and operations to reduce administrative burdens and improve transparency.

#### Strengthen CSO Impact and Public Engagement:

CSOs should expand their membership bases and engage the public through awareness campaigns, while the government should clarify legal definitions to support a more inclusive civic space.

Restrictive laws, funding challenges, and hostile public narratives create a difficult environment for CSOs.



**Legal pressures:** CSOs working on migration and human rights face legal obstacles, limiting their operations. Law 4664/2020 created a registry for CSOs working on asylum and migration, including details on members, employees, and associates. The 2021 Deportations and Returns Law imposes sanctions on CSOs conducting search-and-rescue operations at sea without Hellenic Coast Guard approval.

Administrative burdens: Law 4873/2021 establishes the forms of organized civil society but introduces complex registration processes. Registration challenges and bureaucratic burdens prevent many CSOs from operating effectively. State oversight and discretionary registration policies hinder CSO activities.

**Challenges to funding:** The National Recovery and Resilience Plan (NRRP) does not allocate funds for civil society. There is also lack of transparency in funding decisions, with authorities arbitrarily accepting or rejecting CSO applications.

Funding challenges remain exacerbated for CSOs working with marginalised and excluded groups. The government has delayed the continuation of some CSO work programmes and the renewals of contracts and payments.



## Societal Attitudes & Their Impact on Civic Space

**Public trust in CSOs is increasing, but awareness of their work remains low:** Only 38.1% of Greeks report having sufficient knowledge about the work of public benefit institutions. 68.7% are familiar with the activities of CSOs and, among those, 82.7% view them as having a positive impact on society.

**Public discourse is highly politicized:** Nationalist and conservative groups remain hostile to CSOs advocating for human rights and refugee assistance.

Government and state-aligned media often frame CSOs as foreign-funded or politically motivated. Negative media portrayals, particularly of CSOs working with migrants, persist.

# Smearing Campaigns & Cyber Threats

**Social media environment:** Online disinformation and smear campaigns target CSOs, activists, and journalists. Government surveillance of journalists and CSOs has increased, with spyware scandals (PredatorGate) exposing unlawful state practices.

**Strategic Lawsuits Against Public Participation (SLAPPs):** Lawsuits are used to intimidate journalists and human rights defenders. The 2022 trial of humanitarian workers in Lesvos highlights the criminalization of solidarity efforts.

# Italy

While historically safeguarded by strong constitutional principles and international commitments, Italy's civic space is facing growing challenges that threaten the ability of CSOs to operate freely. Recent legislative measures, bureaucratic barriers, and rising societal polarization have placed increasing restrictions on regulatory freedoms.

Laws such as the Piantedosi Decree and the DDL Eco-Vandali have criminalized humanitarian work and environmental activism, while digital threats and misinformation campaigns have further eroded public trust in CSOs.

Despite these obstacles, civil society remains resilient, continuing to address institutional gaps, advocate for human rights, and support marginalized communities.

#### **Repeal Restrictive Laws on CSOs:**

The Italian government should revoke laws like the Piantedosi Decree and DDL Eco-Vandali to prevent the criminalization of humanitarian work and activism.

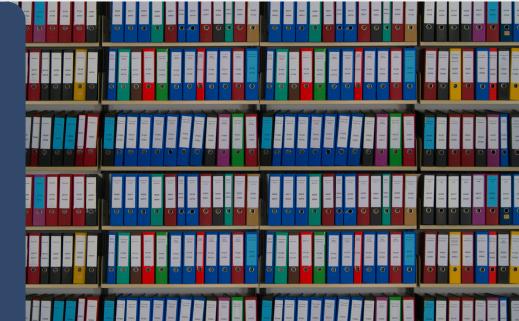
#### **Strengthen Public Communication and Digital Engagement:**

CSOs should use social media and direct outreach to counter disinformation, increase transparency, and build public trust in their work.

#### **Establish Formal Dialogue and Legal Support Networks:**

Local institutions and CSOs should create dialogue platforms to co-design policies and provide legal protections for activists facing judicial harassment.

Recent legislative measures, bureaucratic barriers, and rising societal polarization have placed increasing restrictions on regulatory freedoms.



Constitutional Protections: The Constitution of 1948: guarantees civic freedoms, democracy, and rule of law. Peaceful gatherings are protected, but bureaucratic obstacles and selective enforcement limit protests. It ensures CSOs, advocacy groups, and unions can operate, but NGOs still face legal barriers. Press freedom is protected, but journalists face intimidation, SLAPPs, and censorship threats.

Funding and Administrative Barriers: Decline in public funding for CSOs, especially those addressing migration and environmental issues. Tax incentives favor large organizations, disadvantaging grassroots movements. Bureaucratic delays hinder registration and access to funding, particularly for small NGOs.

Restrictive Legislative Measures: The Piantedosi Decree (2023) Criminalizes migrant rescue operations, imposing bureaucratic and financial burdens on NGOs. The Anti-Vandalism Law (DDL Eco-Vandali) increases penalties for non-violent environmental protests, restricting activism. The Decreto Cutro: Limits humanitarian protection for migrants and expands deportations, reducing NGO capacity to assist. The Caivano Decree expands surveillance and lowers the age of criminal responsibility, deterring youth activism. The Legge Bavaglio (Gag Law) restricts media freedom, penalizing defamation and allowing government censorship of critical reporting.



# Societal Attitudes & Their Impact on Civic Space

Moderate Attitudes towards CSOs: As of 2024, 50% of Italians trust CSOs, marking a 3% increase from previous years. Many Italians support CSOs, especially those providing humanitarian aid, social services, and disaster relief. Majority of Italians recognize the crucial role of non-state actors, including CSOs, in fighting organized crime. Others, particularly within nationalist and conservative circles, view certain NGOs as politically motivated actors. CSOs advocating for women's rights, LGBTQ+ rights, and social justice are widely praised. Migration-focused and environmental CSOs face increasing hostility, with accusations of disrupting public order.

Media bias and political discourse: Public broadcasters face political interference, undermining press neutrality. Restrictive policies foster distrust. Government rhetoric often portrays NGOs, particularly those in migration and environmental sectors, as undermining national sovereignty. This justifies restrictive laws, such as the Piantedosi Decree and Decreto Cutro, which limit CSO operations.

# Smearing Campaigns & Cyber Threats

**Coordinated Online Harassment:** Smear campaigns label CSOs as "threats" or politically biased. Activists and journalists receive death threats, racist abuse, and misogynistic attacks. Some activists are forced into self-censorship or withdrawing from advocacy due to safety concerns.

**Cyber attacks:** NGOs involved in migration, human rights, and environmental protection frequently experience phishing attempts, hacking, and ransomware attacks. These attacks aim to disrupt operations, steal sensitive data, and financially cripple organizations.

### **Moving Forward**



# Strengthening Communication and Public Awareness

- Launch public awareness campaigns that highlight CSOs' contributions to democratic governance, social services and human rights and integrate civil society actors into national civic education initiatives
- Equip CSOs with communication strategies by providing media training on digital advocacy tools and crisis response mechanisms

#### **Promoting Participation in Decision-Making**

- Institutionalise structured dialogue through formal consultation mechanisms that allow for CSOs engagement in policymaking
- Invest in youth engagement through civic education programmes, volunteer networks, and training that could cultivate the next generation of civil society leaders

#### **Enhancing Legal Protections**

- Strengthen legal frameworks to safeguard CSOs' free and safe operation, including cooperation with international organizations
- Streamline NGO registration and reporting processes by eliminating excessive documentation requirements, digitalisation and harmonisation of national databases



## **Moving Forward**

#### **Fostering Financial Sustainability**

- Diversify funding sources, reducing reliance on external donors by fostering partnerships with local businesses and philanthropic organisations
- Expand access to public funding through transparent allocation mechanisms
- Improve financial regulations to remove barriers classifying CSOs as "high-risk entities", facilitate their access to banking services and funding opportunities

#### **Safeguarding Against Cyber Threats**

- Provide cybersecurity training for CSOs to counter cyber threats
- Increase cooperation between CSOs and digital platforms to mitigate algorithmic suppression of advocacy-related content
- Establish monitoring mechanisms to track and respond to emerging threats against CSOs, including surveillance, harassment, and digital attacks

# Addressing Regional Disparities and Promoting Inclusivity

- Increase support for CSOs in Rural and Peripheral Areas
- Strengthen anti-discrimination laws to protect CSOs advocating for marginalized communities
- Encourage cross-border collaboration to foster regional stability, particularly in societies with strong social and ethnical division procedures to reduce bureaucratic obstacles



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