



# Comparative Report on the State of Civil Society in Bulgaria, Cyprus, Greece and Italy



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## Introduction

### *Overview of the report's objectives and scope*

This Comparative Report provides a comprehensive analysis of the state of civic space in the selected countries in Southern Europe, with a specific focus on Bulgaria, Greece, Cyprus, and Italy. The report is the result of an extensive research which aims to identify threats and attacks against Civil Society Organisations (CSOs) and Non-Governmental Organisations (NGOs) in the region. Understanding the shrinking civic space as a complex and multifaceted issue, this project employs a multidimensional approach to assess both political and legal challenges, as well as societal and public discourse-related obstacles faced by civil society actors.

The research process was guided by a common methodological framework developed by CESIE, ensuring consistency across national studies while allowing for the identification of country-specific nuances. Each partner conducted desk research to examine the legal and political landscape affecting CSOs, alongside an assessment of barriers and threats—including sociocultural, financial, political, legal, and digital factors—that hinder civil society's ability to operate freely and effectively.

Context analyses were carried out nationally through key informant interviews and focus group discussions with professionals and activists working within the civic space. These qualitative insights provided valuable perspectives on the lived experiences of those engaged in advocacy, activism, and social work, shedding light on the practical challenges they face and the best practices they have developed to navigate an increasingly constrained environment.

The findings from national country reports have been consolidated into this Comparative Report, which outlines both common trends and country-specific particularities in the state of civic space. By drawing on the analysis of legislation, case law, SLAPPs (Strategic Lawsuits Against Public Participation), administrative restrictions, and other repressive measures, this report offers a thorough overview of the conditions under which CSOs operate in the selected countries. Additionally, it highlights exemplary practices and puts forward key policy recommendations aimed at improving the legal and political framework governing civic space in the region.

The Comparative Report serves as a vital resource for policymakers, civil society actors, and international stakeholders, providing evidence-based insights that can inform future actions to protect and enhance civic space in Southern Europe.

The primary objective of this Comparative Report is to present a structured analysis of civic space in Southern Europe, identifying key challenges and threats faced by CSOs and NGOs. By providing a comparative approach, the report seeks to highlight both shared trends and country-specific differences, offering a deeper understanding of the factors that shape the civic space across the region.

### *Methodology*

The research methodology applied in this Comparative Report follows a framework designed by CESIE, ensuring **coherence** across national reports while allowing flexibility to capture country-specific dynamics. The study combines **desk research** and **empirical qualitative data collection**, adopting a **multi-method approach** to assess the state of civic space in Southern Europe.

Each country report was developed through an initial **desk research phase**, analysing national **legislation, policy frameworks, case law, and relevant reports** from governmental and non-governmental sources. This phase mapped out the legal and institutional conditions affecting CSOs and identified the key barriers—legal, political, financial, and societal—that constrain their operations.

To complement this, a **qualitative data collection** phase was conducted, involving **semi-structured interviews and focus groups** with key stakeholders, including **CSO representatives, activists, and experts**. These discussions provided **in-depth insights into the lived experiences of civil society actors**, revealing specific challenges such as legal constraints, administrative burdens, financial precarity, and digital threats. Additionally, the data highlighted **best practices** and adaptive strategies developed by CSOs to navigate restrictive environments.

The findings from the **national reports** were synthesised into this **Comparative Report**, enabling a **cross-country analysis** of recurring trends and country-specific variations. This methodological approach ensures a **comprehensive** and **context-sensitive** understanding of civic space restrictions while also informing **policy recommendations** to enhance civil society resilience and safeguard democratic engagement in the region.

## Structure

This report is structured to provide a clear and comprehensive analysis of the civic space landscape in Southern Europe. It begins with a **definition of civic space**, establishing the conceptual framework for the subsequent analysis. The next section explores the **legal and political environment**, summarizing national legislation and regulatory conditions affecting CSOs in the region. This is followed by an in-depth examination of **public discourse and societal challenges**, which includes an assessment of trends in public perception, smear campaigns, and digital threats targeting civil society organizations.

The report then presents a **regional analysis** that highlights both common patterns and country-specific variations in the challenges faced by CSOs. This comparative section provides a synthesized overview of key restrictions, administrative barriers, and financial constraints that affect civil society actors across the four countries. Finally, the report concludes with **policy recommendations** aimed at strengthening civic space and improving protections for CSOs, followed by annexes containing additional data and references.

By following this approach, the report ensures that the findings are presented in a logical and accessible manner, enabling stakeholders to gain a clear understanding of the issues at hand and identify actionable steps to support civil society in Southern Europe.

## Defining Civic Space in Southern Europe

“Civic space is the environment that enables people and groups – or ‘civic space actors’ – to participate meaningfully in the political, economic, social and cultural life in their societies. Vibrant civic space requires an open, secure and safe environment that is free from all acts of intimidation, harassment

and reprisals, whether online or offline. Any restrictions on such a space must comply with international human rights law.”.<sup>1</sup>

The extent to which civic space is protected or restricted depends on national legal, political, and societal frameworks. While some countries uphold these freedoms with clear legal protections, others impose administrative and political constraints that limit the effectiveness of civic initiatives. The following sections examine the definition and condition of civic space in Bulgaria, Cyprus, Greece, and Italy, highlighting regional characteristics before providing a comparative analysis.

Civic space is the fundamental pillar of democratic engagement, enabling individuals, groups, and organisations to associate, express opinions, and participate in public life without undue restrictions. It is shaped by a combination of legal frameworks, political dynamics, financial conditions, and societal attitudes, which collectively determine the extent to which civil society can operate freely. In Southern Europe, while fundamental freedoms of association, expression, and assembly are formally recognised, their practical application is increasingly constrained by restrictive policies, administrative burdens, financial instability, and shifting public perceptions.

At a regional level, civic space is undergoing a process of gradual restriction, influenced by both external and internal factors. Across the selected countries in Southern Europe, legislative measures have tightened the operational space for CSOs, particularly those engaged in advocacy, migration, human rights, and environmental activism. In some cases, governments have used legal frameworks as a tool for increased oversight and control, imposing complex registration requirements, funding restrictions, and legal threats. While constitutional protections exist in some contexts, they are often undermined by inconsistent enforcement, selective restrictions, and administrative hurdles that disproportionately affect smaller and grassroots organisations.

Financial sustainability represents one of the most significant constraints on civic space in the region. CSOs struggle to secure stable and diverse funding sources, with many reliant on international donors due to limited domestic financial support. This dependency exposes organisations to accusations of foreign influence, leading to political and legal scrutiny, particularly in cases where governments seek to delegitimise civil society actors critical of state policies. Additionally, bureaucratic inefficiencies in financial regulations make it difficult for organisations to access funding, while restrictive banking practices—such as classifying CSOs as high-risk entities—further hinder financial operations.

Geographical disparities also influence the accessibility and effectiveness of civic space. Civic engagement tends to be concentrated in urban centres, where organisations benefit from stronger institutional networks, access to funding, and a more engaged public. In contrast, rural areas often remain underserved, with fewer opportunities for civic participation and a weaker presence of organised civil society. This urban-rural divide creates an imbalance in the distribution of resources and influence, limiting the inclusivity of civic engagement and reinforcing social inequalities.

A key trend across the region is the growing politicisation of civic space. CSOs advocating for human rights, migration policies, and environmental protections have increasingly found themselves at the centre of political debates, often facing smear campaigns, legal intimidation, and restrictions on their activities. Governments and political actors have at times framed civil society as an opponent rather than a partner, using narratives that portray NGOs as foreign agents, disruptors, or obstacles to national security. These hostile discourses, amplified by segments of the media and digital

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<sup>1</sup> United Nations Guidance Note on Protection and Promotion of Civic Space, Executive Summary, 2020. Available at: [file:///C:/Users/User/Downloads/un\\_guidance\\_note.pdf](file:///C:/Users/User/Downloads/un_guidance_note.pdf)

misinformation campaigns, have contributed to declining public trust in civil society, particularly in contexts where nationalist and populist rhetoric is dominant.

Despite these constraints, civil society remains resilient and continues to play a critical role in defending democratic principles and social rights. Across Southern Europe, CSOs engage in legal and policy advocacy, provide essential services, and mobilise grassroots activism to counteract restrictive measures. However, their ability to operate freely is increasingly challenged by legal and financial pressures, administrative barriers, and negative public discourse.

Overall, civic space in Southern Europe is being reshaped by a combination of legal restrictions, financial uncertainty, political pressures, and shifting public attitudes. Ensuring a more open and democratic environment requires reinforcing legal safeguards, improving access to sustainable funding, reducing bureaucratic barriers, and fostering greater collaboration between civil society and institutions. Addressing these challenges is essential to preserving civic engagement and upholding fundamental rights across the region.

### Comparative Analysis

Across Bulgaria, Cyprus, Greece, and Italy, the concept of civic space is shaped by national legal frameworks, political conditions, and societal structures, which determine the extent to which individuals and organisations can associate, express opinions, and engage in democratic life. While all four countries formally recognise fundamental freedoms, **the practical application and level of protection vary significantly.**

In Bulgaria and Cyprus, civic space is recognised within national legal frameworks, yet bureaucratic inefficiencies and administrative inconsistencies create significant barriers for CSOs. In Bulgaria, public engagement is hindered by a combination of economic hardship and the concentration of organisations in urban centres, limiting rural participation. Cyprus, meanwhile, has seen a shift towards grassroots activism, particularly in response to **government policies that favour larger, well-established organisations over smaller initiatives.**

Greece has historically lacked a **clear** regulatory framework, leading to fragmented oversight and inconsistent enforcement. The introduction of Law 4873/2021 represents an effort to address these gaps, but **registration challenges and financial instability continue to limit the effectiveness of CSOs.** In Italy, civic space benefits from strong constitutional protections, allowing civil society to function with legal security. However, recent legislative restrictions—particularly those targeting **migration-focused organisations, humanitarian work, and activism**—have **weakened** protections in practice, **reducing avenues for civic engagement.**

The **geographic distribution** of civil society activity also varies. Bulgaria and Cyprus exhibit **notable** urban-rural divides, with civil society activity concentrated in Sofia and Nicosia, **leaving** rural populations with limited access. In Greece and Italy, **challenges stem more from legal and financial constraints rather than geographic factors alone.**

Despite **differences**, a **common trend across all four countries is the increasing pressure on civic space due to political, administrative, and legal constraints.** In Bulgaria and Cyprus, **financial instability and bureaucratic inefficiencies limit civic engagement**, while in Italy and Greece, **direct political and legal pressures—especially targeting activists, journalists, and human rights organisations—are restricting the ability of CSOs to function freely.**



Nevertheless, civil society actors **continue to play an essential role** in upholding democratic values. **Greece is developing a more structured legal framework, Cyprus is fostering grassroots movements, Bulgaria is sustaining active initiatives despite financial obstacles, and Italy is challenging restrictive measures through legal action.** Ensuring a **stable and open** civic space in Southern Europe will require **enhanced legal protections, stronger financial support mechanisms, and institutional commitments to promoting democratic participation.**

## Legal and political environment

### Similarities

- **Restrictive Legislation** poses significant challenges for CSOs, as all four countries impose administrative and legal barriers that disproportionately affect organizations working in migration and human rights. These constraints make it difficult for NGOs to comply with regulations and often create legal uncertainties that hinder their operations.
- **Financial Challenges** threaten the sustainability of CSOs, with bureaucratic obstacles and funding restrictions making it difficult for organizations to secure stable financial support. Many CSOs are forced to rely on private donors or foreign funding, which governments sometimes use as a justification to question their legitimacy or impose additional regulatory burdens.
- **Threats to Press Freedom** have increased across the region, as journalists and activists frequently face legal harassment, surveillance, and lawsuits designed to silence critical voices. SLAPP lawsuits are commonly used to intimidate those exposing corruption, human rights violations, or government misconduct, posing a significant threat to civic engagement.
- **Administrative Barriers** create additional difficulties for CSOs, as organizations often experience long delays in registration, excessive bureaucracy, and unclear legal requirements. These burdens disproportionately impact small and grassroots organizations that lack the financial and legal resources to navigate complex regulatory environments.
- **Political Pressures** on CSOs have intensified, with governments using various strategies to limit their influence and suppress critical voices. In some cases, states impose legal and financial restrictions, while in others, smear campaigns and disinformation tactics seek to undermine public trust in civil society organizations, framing them as foreign agents or politically motivated actors.

### Differences

- **Bulgaria's institutional support for CSOs (CCSD) exists but is largely ineffective, whereas Cyprus, Greece and Italy lack similar frameworks.** However, field research indicates that even in Bulgaria, engagement with this body remains inconsistent and largely symbolic.
- **Greece has adopted more overtly restrictive policies towards migration-related NGOs, while Italy and Bulgaria use administrative hurdles rather than direct criminalization.** Activists in Greece described significant legal risks associated with NGO work in migration and refugee protection, with some organizations forced to cease operations.
- **Italy's constitutional protections are strong but undermined by selective enforcement, whereas Greece and Bulgaria impose more direct legislative constraints.** Findings from Italy suggest that civil society actors face harassment primarily through legal and financial scrutiny rather than outright bans.
- **Cyprus' financial barriers stem largely from banking policies rather than direct government intervention, unlike Greece and Bulgaria, where state-imposed funding restrictions play a**

**significant role.** Cypriot activists highlighted their unique struggle with financial institutions refusing service to NGOs without clear justification.

### *Summary of national legislation and regulatory environment*

The regulatory environment for CSOs across Bulgaria, Cyprus, Greece, and Italy presents both shared challenges and country-specific approaches. While all four countries recognize fundamental freedoms of association and assembly within their legal frameworks, the degree of administrative burden, political interference and financial restrictions varies significantly. In recent years, a trend of increasing governmental control and legislative restrictions on civil society has been observed across the region, often justified under the guise of security, anti-money laundering measures, and migration control.<sup>2</sup>

Despite these overarching themes, each country has developed its own regulatory framework, reflecting distinct historical, political, and legal traditions.<sup>3</sup> The commonalities between these countries demonstrate a regional trend of increasing restrictions on civil society, while the differences highlight the unique political and legal struggles faced by CSOs in each national context.<sup>4</sup>

### *Bulgaria*

The **Non-Profit Legal Entities Act** governs the establishment and operation of NGOs in Bulgaria. The act covers the entire lifecycle of NGOs, from registration and operational processes to dissolution. While the registration process is relatively straightforward, rejection rates remain high due to bureaucratic inefficiencies and legal ambiguities.<sup>5</sup> Political, trade union and religious organizations are regulated separately. The law provides transparency mechanisms but suffers from inconsistent NGO categorization, which affects accountability and policymaking.<sup>6</sup>

Bulgaria has attempted to introduce reforms for digitalizing NGO operations, but legislative amendments have stalled. The COVID-19 pandemic highlighted gaps in regulations related to online decision-making and attempts to implement clearer guidelines remain unresolved. Moreover, NGOs operating in areas such as human rights advocacy have reported experiencing administrative harassment and political pressure.<sup>7</sup> Field research indicates that CSOs in Bulgaria frequently encounter bureaucratic delays and vague regulatory interpretations, complicating their ability to function effectively. Many organizations struggle with financial sustainability due to limited access to domestic funding sources.<sup>8</sup>

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<sup>2</sup> CIVICUS Monitor, *Civic space trends in Southern Europe*, 2023. Retrieved from <https://monitor.civicus.org>

<sup>3</sup> European Commission, *Annual report on civil society and fundamental rights in the EU*, 2023. Retrieved from <https://ec.europa.eu>

<sup>4</sup> European Democracy Observatory, *Civil society and policy-making in Europe*, 2023. Retrieved from <https://www.edo.org>

<sup>5</sup> Center for Civil Society Studies, *NGO legal frameworks in Bulgaria: Challenges and opportunities*, 2021. Retrieved from <https://www.ccss.org>

<sup>6</sup> Viken, G. and Zahariev, B. *Civic Engagement in Bulgaria and Norway*, Sofia: Open Society Institute Sofia, 2024.

<sup>7</sup> Narsee, Aarti et al. *Civic Space Report 2024: Bulgaria*: Bulgarian Center for Non-For-Profit Law, 2024.

<sup>8</sup> OSCE, *Bulgaria's regulatory environment for NGOs: An assessment*, 2021. Retrieved from <https://www.osce.org>



Participation in policy-making is constitutionally protected. NGOs can propose legislative changes, participate in public consultations and engage with parliamentary committees. However, CSO involvement is optional rather than mandatory, and consultative bodies lack transparency.

Freedoms are constitutionally protected, but restrictions apply to organizations threatening national security or public order. Freedom of assembly does not require formal permission, but incidents of excessive police force have been reported. Journalists face SLAPPs and censorship through legal mechanisms.

The **Council for Civil Society Development (CCSD)** was established to support NGOs but remains ineffective due to bureaucratic delays and political instability.<sup>9</sup>

## Cyprus

The **Law on Associations, Foundations and Other Related Issues (L. 104(I)/2017)** modernized Cyprus' framework, allowing foreign NGOs to operate and establishing legal personality for federations of organizations. However, bureaucratic obstacles persist, including inconsistent district office interpretations and delays in legal document approvals.<sup>10</sup>

The **2020 Amendment to the Law on Trade Unions** led to the de-registration of several CSOs due to stringent compliance requirements. The government has been criticized for imposing disproportionate restrictions on the right of association. Moreover, the banking sector has categorized NGOs as high-risk entities, leading to challenges in opening or maintaining bank accounts. CSOs often face sudden freezes of funds without prior warning, impacting their financial stability.<sup>11</sup>

Public consultation is limited. Despite efforts to strengthen engagement, there is no formalized framework ensuring CSO participation in decision-making. Bureaucratic inefficiencies and lack of government recognition hinder meaningful involvement. Press freedom faces challenges, with criminal penalties for criticizing authorities. Public protests are legally allowed but may face administrative restrictions.

## Greece

Law **4873/2021** regulates CSOs, but additional laws since 2020 have imposed restrictive measures, particularly on organizations involved in migration, asylum and social integration. NGOs must register with the **Ministry of Migration and Asylum**, which has discretionary approval power and can reject applications without clear justification.<sup>12</sup>

Several organizations providing refugee aid have been criminalized under the **2021 Deportations and Returns Law**, which imposes legal and financial penalties on CSOs participating in rescue missions

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<sup>9</sup> European Commission, 2024 Rule of Law Report. Country Chapter on the rule of law situation in Bulgaria, (SWD(2023) 802 final), Brussels, 2023.

<sup>10</sup> Cyprus Human Rights Watch. (2022). CSO participation and banking restrictions in Cyprus, 2022. Retrieved from <https://www.cyprushumanrights.org>

<sup>11</sup> Transparency International. (2022). Corruption risks and NGO financial regulations in Cyprus. Retrieved from <https://www.transparency.org>

<sup>12</sup> Huliaras, A., "Greek Civil Society: The Neglected Causes of Weakness." In *Austerity and the Third Sector: Civil Society at the European Frontline*, 2015.

without prior government authorization. Greece's restrictive framework extends beyond migration-related activities, as CSOs engaging in human rights and anti-corruption advocacy have also reported increasing government scrutiny.<sup>13</sup>

Field research confirms that NGO workers, particularly those in the refugee and human rights sectors face harassment, legal obstacles, and restrictive government policies. Several organizations have reported encountering intentional bureaucratic hurdles that prevent their registration and full participation in policy-making processes. Many CSOs also face substantial operational restrictions due to selective law enforcement and legal intimidation.

The legal framework imposes significant barriers to CSO participation. Strict NGO registration laws and discretionary rejection criteria have reduced engagement in migration and asylum policy. Public consultations are often symbolic, with limited impact on legislative processes.<sup>14</sup> Freedom of assembly is restricted by new laws allowing authorities to disperse protests. Surveillance and legal harassment of journalists and activists limit freedom of expression.<sup>15</sup>

The **Ministry of Migration and Asylum's registration system** controls NGO activities, limiting their independence. No independent body effectively supports CSO development.<sup>16</sup>

## Italy

The **Italian Constitution (Articles 17, 18, and 21)** protects the fundamental freedoms of assembly, association and expression. However, in practice, new laws such as **Decree Law No. 1/2023** have introduced operational challenges for NGOs. These laws impose stricter financial reporting requirements and increased oversight for organizations engaged in migration and environmental advocacy. NGOs working on migration-related activities have faced direct government interference, particularly those conducting sea rescue missions for refugees.<sup>17</sup>

Journalists and activists have reported increased legal harassment, with SLAPP lawsuits being used to suppress investigative reporting. Additionally, there have been concerns regarding the political influence over state-funded media outlets, leading to constraints on independent journalism.<sup>18</sup> Field research reveals that civil society actors in Italy face increased surveillance, selective enforcement of regulations and political pressure on advocacy organizations, particularly those engaged in migration and environmental issues.

Italy's legal framework allows for public participation in policy-making but suffers from bureaucratic inefficiencies. Public assemblies require prior notification, and selective enforcement disproportionately affects politically sensitive movements.<sup>19</sup> Moreover, press freedom is undermined by government influence over public media and SLAPPs against journalists.<sup>20</sup>

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<sup>13</sup> [Civic-Space-Report-2024 ECF.pdf](#)

<sup>14</sup> [Greece: humanitarian action under attack - CIVICUS LENS](#)

<sup>15</sup> [World Justice Project: Rule of Law Index 2023 - govwatch](#)

<sup>16</sup> [Civic-Space-Report-2024 ECF.pdf](#)

<sup>17</sup> The Italian Constitution, Title I - Available at: Titolo I - Rapporti civili | [www.governo.it](http://www.governo.it).

<sup>18</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#).

<sup>19</sup> Giordano A., No security for rights. Human Rights Watch's World Report 2025 flunks Italy, *Altraeconomia*, January 2025.

<sup>20</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#).

There is no centralized institutional framework for supporting CSOs, but the judiciary and regulatory authorities play a role in oversight.<sup>21</sup>

### *Protection measures*

The protection of CSOs across Southern Europe is shaped by a complex interplay of constitutional safeguards, legal frameworks, and institutional mechanisms. Generally recognized protection measures include constitutional guarantees for freedom of association, expression, and peaceful assembly, as well as international commitments such as the European Convention on Human Rights, EU directives, and the United Nations Declaration on Human Rights Defenders. These legal instruments establish a broad framework intended to safeguard civic space and protect organizations from undue state interference. At the national level, most European countries have legal provisions enshrined in their constitutions or specific legislation that grant CSOs the right to operate freely, engage in advocacy, and receive funding from both domestic and international sources.

Institutional mechanisms further bolster these protections, with many countries establishing Ombudsman offices, human rights commissions, and anti-discrimination bodies tasked with monitoring and addressing violations against CSOs. In principle, these institutions serve as mediators between civil society and the state, offering legal recourse in cases of harassment, discrimination, or undue restrictions. Legal provisions against defamation, hate speech, and cyber threats should also shield CSOs from politically motivated attacks, ensuring that they can function without fear of intimidation or violence. Furthermore, judicial safeguards, including anti-SLAPP (Strategic Lawsuits Against Public Participation) protections, are meant to prevent powerful actors—whether state-affiliated or private—from using legal intimidation to silence activists and journalists. Access to financial resources remains another crucial component of CSO protection, with EU regulations emphasizing the importance of financial transparency while also ensuring that restrictions do not unduly burden civic organizations. European institutions, particularly the European Court of Human Rights (ECHR) and the European Commission, play a significant role in reinforcing these protections by setting legal precedents, advocating for policy changes, and holding national governments accountable when they violate democratic principles. These mechanisms, when effectively implemented, create a robust framework that allows CSOs to operate in an environment that respects civic freedoms, promotes accountability, and fosters democratic engagement.

Despite these formal protections, the practical implementation of these measures in Bulgaria, Cyprus, Greece, and Italy is inconsistent and often ineffective, leaving many CSOs vulnerable to legal, financial, and political pressures. Legislative gaps and restrictive policies create vulnerabilities, with Bulgaria lacking a comprehensive legal framework for human rights defenders as well as civil society actors from politically motivated attacks, and Greece criminalizing humanitarian assistance for migrants.<sup>22</sup> For instance, in December 2022, Panayote Dimitras, a prominent human rights defender, was accused of forming a “criminal organization” to facilitate irregular migration, leading to a travel ban and restrictions on his work.<sup>23</sup> In some cases, existing constitutional protections are undermined by selective enforcement, politically motivated legal action, and administrative burdens that disproportionately affect advocacy-oriented CSOs. Financial instability is exacerbated by restrictive

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<sup>21</sup> Chiodi L., Epis S., Italian civil society: from target to antidote to the crisis of democracy?, CILD, October 2024.

<sup>22</sup> RSF, Bulgaria: Alarming SLAPP cases endanger fragile media freedom.

<sup>23</sup> [greece - Civicus Monitor](#)

banking policies in Cyprus, state-imposed funding restrictions in Greece and Bulgaria, and bureaucratic hurdles in Italy. In Cyprus, the financial sector independently classifies CSOs as high-risk entities, leading to difficulties in obtaining banking services and processing transactions. Additionally, state funding remains limited, slow, and disproportionately allocated to service-oriented CSOs, while organisations advocating for migration rights, bicommunal reconciliation, and human rights struggle to secure sustainable funding. In Italy, too, access to public funds remains heavily restricted, with bureaucratic delays and a lack of transparency forcing many organisations to rely on private grants.<sup>24</sup> Legal harassment through SLAPPs remains a major issue, particularly in Greece and Bulgaria, where defamation laws are weaponized against activists and journalists. Indeed, the defamation provisions of Article 148 of the Bulgarian Criminal Code have been utilised by politicians and corporate actors to intimidate CSOs through costly legal proceedings, while Greece remains the EU's lowest-ranked country for press freedom.<sup>25</sup>

Institutional mechanisms designed to protect CSOs are frequently found to be deficient in terms of enforcement power. Illustrative of this are the institutional mechanisms present in the Bulgarian Ombudsman institution, which is not equipped with the capacity to provide CSOs with direct legal or institutional safeguards that would serve to protect them from harassment, defamation, or physical threats. This situation is further compounded by the emergence of pervasive digital security threats, including cyberattacks and disinformation campaigns, which have a detrimental effect on civic space across the region.<sup>26</sup> Additionally, in countries like Greece and Italy, political hostility towards migration and human rights organizations has led to increasingly repressive measures, including criminal investigations, administrative fines and restrictive legal frameworks that directly target CSO activities. In Italy, for instance, field research has revealed that while some volunteer-based CSOs, such as RETAKE, have remained relatively unaffected by judicial constraints, others, such as Rewild Sicily, have experienced legal and bureaucratic repression, particularly in their efforts to implement European reforestation programmes.<sup>27</sup>

The restrictive environment for CSOs across Southern Europe signals a troubling trend of shrinking civic space. While constitutional and international protections theoretically exist, their uneven implementation exposes organizations to financial insecurity, legal intimidation, and political suppression. The lack of effective institutional safeguards means that many CSOs are left to rely on informal networks and international advocacy to counteract domestic restrictions. Addressing these challenges requires not only legal reforms but also stronger institutional commitments to safeguarding civic freedoms. Governments must take concrete steps to ensure that judicial and administrative mechanisms operate independently, free from political influence, to uphold the rights of civil society actors. Additionally, international institutions, including the European Union and the Council of Europe, must continue to apply pressure on national governments to comply with democratic principles and protect civic space. Without decisive action to counter restrictive policies and bolster enforcement mechanisms, CSOs will continue to face significant barriers in their role as watchdogs of democracy and human rights. Strengthening regional cooperation, promoting legal

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<sup>24</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#)

<sup>25</sup> [GREECE | Civic Space Watch](#)

<sup>26</sup> RSF, [Bulgaria: Alarming SLAPP cases endanger fragile media freedom](#).

<sup>27</sup> De Leo A., Op-ed: Does the Rome court's refusal to validate the detention order of the first asylum seekers brought to Albania mark the end of the Italy-Albania deal?, EU Council on Refugees and Exiles, October 2024.

reforms, and fostering a culture of civic engagement are essential steps in reversing the current trend and ensuring that civil society remains a cornerstone of democratic governance in Southern Europe.

### *Emerging operational challenges for CSOs*

Across the selected countries in Southern Europe, the absence of dedicated monitoring mechanisms has contributed to a deteriorating civic space, where CSOs face growing restrictions without institutional protection or avenues for redress. In Bulgaria, Cyprus, Greece, and Italy, state inaction, weak oversight structures, and lack of transparency have allowed threats to civil society to escalate unchecked. Without systematic data collection, independent watchdog institutions, and stronger protection measures, the sector remains highly vulnerable to smear campaigns, restrictive legislation, and digital threats. Addressing this critical gap in monitoring is essential for ensuring accountability, preventing further restrictions, and safeguarding civic engagement in the region.

### *Decline in civic participation mechanisms*

In the past four years, civic participation mechanisms across Southern Europe have faced growing challenges, primarily driven by political instability, bureaucratic inefficiencies, restrictive legislative frameworks, and a general decline in institutional transparency. These obstacles have contributed to a weakening of public engagement in policy-making, limiting opportunities for CSOs to influence democratic processes effectively.

In Bulgaria, factors such as persistent parliamentary instability, the global pandemic, and the deteriorating rule of law have increasingly disrupted the functionality of state institutions, significantly impacting civic participation. The Civic Participation Index has recorded a decline in Bulgaria's performance from 2021 to 2023 across all monitored categories, including environment, practices, and effectiveness. The 2024 Rule of Law report notes that Bulgaria's process for introducing legislative proposals by MPs lacks essential standards, such as engaging civil society and ensuring compliance with EU law.<sup>28</sup>

Institutional frameworks, such as the Council for Civil Society Development, have remained largely ineffective due to prolonged dysfunction. Initially recognised as a promising initiative, the council has suffered from leadership delays and operational stagnation, rendering its impact negligible. Broader governance challenges and declining trust in participatory mechanisms have further discouraged CSOs from engaging with institutions. The Parliamentary Commission on Direct Citizen Participation and Interaction with Civil Society struggled to establish the Civil Council in 2023 due to low participation rates, particularly from key sectors such as volunteerism and public security. Although the Civil Council was eventually formed later that year, it failed to convene any joint sessions, demonstrating the fragility of participatory structures.

A notable case of dysfunctional civic participation was the Bulgarian Ministry of Justice's refusal to provide information regarding the working group tasked with drafting amendments to the Judicial System Act. The Union of Judges in Bulgaria (UJB) sought to participate in this group in October 2024 but received no response. A subsequent formal request for transparency regarding the selection

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<sup>28</sup> European Commission, [2024 Rule of Law Report. Country Chapter on the rule of law situation in Bulgaria](#), (SWD(2023) 802 final), Brussels, 2023.



criteria and composition of the group was denied, with the Ministry citing internal procedural rules.<sup>29</sup> This lack of transparency not only prevents CSOs from effectively contributing to legislative discussions but also underscores broader governance failures that hinder open and accountable policy-making.

In Cyprus, civic participation mechanisms remain underdeveloped, with public engagement in decision-making limited by bureaucratic obstacles, weak institutional support, and a lack of formal consultation frameworks. While CSOs are legally recognised and permitted to operate, the implementation of participation mechanisms remains inconsistent. Public consultations are infrequent, and when they do occur, they are often superficial and lack meaningful follow-up. Many CSOs report that government bodies rarely integrate civil society input into final policy decisions, creating a sense of disillusionment and reducing motivation for continued engagement.

A key structural issue in Cyprus is the absence of well-defined legal provisions ensuring structured CSO involvement in governance processes. The Law 104(I)/2017 on Associations, Foundations, Federations, and Unions, which regulates CSOs, is often interpreted inconsistently across different administrative districts, further complicating participation. Additionally, CSOs face financial sustainability challenges, making it difficult for them to allocate resources toward advocacy work. The banking sector's classification of CSOs as high-risk entities further exacerbates these difficulties, restricting access to funding and making financial transactions more burdensome.<sup>30</sup>

The Greek civic participation landscape presents contradictory trends: on one hand, there is a growing number of CSOs and increased public awareness of their role, while on the other, restrictive policies, hostile rhetoric, and legal barriers continue to undermine their participation in governance. The 2022 Civicus Monitor report downgraded Greece from a "narrowed" to an "obstructed" civic space, citing the government's continued crackdown on civil society and activists. Participation in policy-making remains limited, with restrictive registration laws for NGOs and government hostility toward organisations working on migration, human rights, and environmental justice.<sup>31</sup>

A significant barrier to civic participation in Greece is the criminalisation of solidarity, particularly affecting organisations supporting refugees and asylum seekers. Legal frameworks such as the 2020 law on NGO registration impose heavy bureaucratic requirements, forcing many organisations to cease operations due to fears of prosecution. The government's failure to amend these restrictions, despite international pressure, has significantly narrowed civic space. Moreover, surveillance practices and arbitrary lawsuits against independent journalists further discourage civic engagement, as press freedom in Greece has declined to the lowest level in the EU.<sup>32</sup>

In Italy, while civic engagement remains strong at the grassroots level, institutional participation mechanisms have weakened due to political polarisation, increasing bureaucratic barriers, and declining government support for civil society initiatives. CSOs operating in sectors such as migration, environmental justice, and human rights face growing hostility from both political actors and segments of the public.

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<sup>29</sup> Access to Information Program, Ministry of Justice's refusal undermines due transparency of the legislative process [[Отказ на Министерството на правосъдието подкопава дължимата прозрачност на законодателния процес](#)], 13 December, 2024.

<sup>30</sup> Karaoli, E., Papazoglou, C., Tsiarta, M., & Vasilara, M., GUIDE - Developments for NGOs: Legislative changes regarding associations, foundations, clubs, and federations. Civil Society Organisations (CSOs): Challenges in Relation to the Legal Operational Framework and Recommendations for Creating an Enabling Environment for CSOs in Cyprus, 2018.

<sup>31</sup> [STATE OF CIVIL SOCIETY REPORT](#)

<sup>32</sup> [greece - Civicus Monitor](#)



Public participation mechanisms are often bypassed in key decision-making processes, as many CSOs report that government bodies frequently ignore their input. Bureaucratic obstacles, including complex registration procedures and limited access to public funding, further hinder their ability to engage with institutions effectively. Moreover, financial barriers and resource constraints disproportionately affect smaller organisations, preventing them from sustaining long-term advocacy efforts.<sup>33</sup>

A growing concern is the erosion of public trust in civic participation mechanisms. The rise of digital disinformation campaigns and smear narratives against CSOs has fuelled public scepticism, making it harder for organisations to mobilise support. Additionally, the judiciary has failed to provide consistent protection against Strategic Lawsuits Against Public Participation (SLAPPs), which are frequently used against civil society actors and investigative journalists. Despite international scrutiny from human rights bodies, legislative and procedural reforms have been slow, leaving CSOs vulnerable to politically motivated restrictions.

Across Southern Europe, civic participation mechanisms are increasingly constrained by governance failures, bureaucratic inefficiencies, restrictive legal frameworks, and declining institutional trust. While CSOs continue to operate and engage in advocacy, their ability to influence policy-making is increasingly limited by government hostility, lack of transparency, and structural barriers. The shrinking civic space in Bulgaria, Cyprus, Greece, and Italy underscores the need for urgent reforms to enhance participatory governance, strengthen institutional safeguards for CSOs, and counteract the growing wave of disinformation and restrictive policies. Without these measures, the role of civil society in shaping democratic processes risks becoming purely symbolic rather than substantively impactful.

### *Lack of monitoring*

Across Southern Europe, the lack of systematic monitoring mechanisms for CSOs has severely weakened the sector's ability to track and address key threats such as hate speech, smear campaigns, SLAPPs, physical violence, and cyber threats. Despite formal structures in place, institutional inaction, bureaucratic inefficiencies, and the absence of dedicated oversight bodies have left CSOs vulnerable to hostile political environments and repressive measures.

In Bulgaria, no centralised monitoring mechanism currently exists to systematically document and respond to the escalating attacks on civil society. While the Council for Civil Society Development is formally tasked with conducting annual reviews of CSOs' needs and challenges, in practice, it has failed to fulfil this role. Bureaucratic delays, lack of leadership, and political unwillingness have prevented the council from establishing a functional oversight framework, leaving the sector without institutional support to track threats and policy developments. This inaction has left CSOs unprotected against smear campaigns, SLAPP lawsuits, and restrictive legal initiatives, such as the proposed Foreign Agents Bill.<sup>34</sup>

Additionally, no public reporting system exists to track hate speech and threats against civil society actors. While the Commission for Protection Against Discrimination (CPAD) handles some cases related to discrimination and hate speech, its mandate does not explicitly include monitoring attacks against CSOs. The lack of transparency in judicial processes, particularly regarding the prosecution of hate crimes and politically motivated legal cases, further exacerbates the problem. Cyber threats

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<sup>33</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#)

<sup>34</sup> Yordanov and Zahariev [Dynamics of the NGO Sector in Bulgaria](#). Sofia: Open Society Institute Sofia, 2023.

against CSOs, including DDoS attacks from pro-Russian hacker groups, remain underreported due to the absence of a central cybersecurity framework for civil society.<sup>35</sup>

In Cyprus, the absence of an independent mechanism to monitor and report on threats to civic space has left CSOs exposed to harassment, online abuse, and institutional neglect. The country has no formal legal framework ensuring systematic reporting on attacks against activists or civil society organisations, and law enforcement rarely intervenes in cases of harassment or intimidation. The legal environment remains overly focused on regulatory compliance, with little attention given to protection mechanisms or proactive monitoring of threats against CSOs.

Despite legislative reforms aimed at improving transparency in the CSO registration process, authorities have not established a monitoring body to track challenges such as financial restrictions, legal harassment, or media smear campaigns. Many CSOs report that their concerns regarding restrictive policies and growing hostility are ignored by state institutions, further diminishing trust in public authorities. The lack of structured consultation with CSOs has meant that instances of bureaucratic obstacles, arbitrary legal actions, and negative media narratives go undocumented, further discouraging civic engagement.

In Greece, the monitoring of civil society restrictions and attacks remains highly fragmented, with no single body tasked with overseeing threats to CSOs. The Ministry of Migration and Asylum's restrictive NGO registration law (2020), which introduced excessive regulatory barriers for organisations supporting refugees, has been widely criticised for lack of transparency and accountability. However, no formal mechanism exists to assess the impact of these measures on CSO operations and access to funding.<sup>36</sup>

International organisations such as Civicus and the Council of Europe have repeatedly raised concerns over the absence of a structured monitoring process to track violations of civil society freedoms in Greece. The criminalisation of humanitarian work, particularly affecting search-and-rescue NGOs, remains a key area where monitoring mechanisms are missing. Civil society actors, particularly those involved in migration, environmental activism, and human rights advocacy, continue to face surveillance, legal harassment, and negative political rhetoric without any structured way to report or contest these actions.<sup>37</sup>

Additionally, press freedom in Greece has deteriorated, with independent journalists and media outlets facing intimidation and SLAPP lawsuits. The lack of a national watchdog overseeing judicial interference in CSO work has led to cases where investigations into state surveillance and corruption have been obstructed. As a result, legal and bureaucratic harassment of civil society actors continues unchecked, contributing to a climate of fear and self-censorship among activists and journalists.<sup>38</sup>

In Italy, despite strong constitutional protections for civic engagement, no dedicated state body exists to systematically monitor the challenges faced by CSOs. The shrinking of civic space, particularly through legislative restrictions on migration and environmental activism, has not been accompanied by institutional oversight mechanisms to track its effects. The failure to implement European civic engagement measures at the national level has further weakened CSO participation in governance.

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<sup>35</sup> Coalition Against SLAPPS in Europe, [SLAPPS: Threat to Democracy Continue to Grow](#).

<sup>36</sup> Spiratou D., Civic Space Report - Greece 2024, European Civic Forum, 2024. [CIVIC SPACE REPORT](#)

<sup>37</sup> [greece - Civicus Monitor](#)

<sup>38</sup> Ibidem.

Many civil society actors report significant bureaucratic delays in obtaining funding or registering advocacy initiatives, yet no independent monitoring body tracks these institutional barriers. Additionally, the increasing use of SLAPP lawsuits against journalists and activists remains underreported, as the judicial system does not systematically monitor these cases. While public interest organisations continue to challenge restrictive policies, their efforts are hindered by a lack of transparency in decision-making processes.<sup>39</sup>

A critical gap in Italy's monitoring landscape is the lack of digital threat assessment mechanisms. CSOs and independent journalists have reported a surge in online harassment, misinformation campaigns, and cyberattacks, particularly targeting organisations working on migrant rights, LGBTQ+ advocacy, and climate justice. Despite these growing concerns, no dedicated cybersecurity protection framework for CSOs has been developed, leaving civil society actors vulnerable to coordinated digital intimidation efforts.<sup>40</sup>

### Political pressure

Political pressure on CSOs in Southern Europe has intensified. While states publicly acknowledge the role of CSOs in democratic governance, many governments continue to implement laws and policies that restrict civic engagement, limit funding access, and criminalise certain forms of activism. These measures have led to growing mistrust, self-censorship, and reduced public participation, exacerbating the shrinking civic space in the region.

In Bulgaria, political pressure against CSOs has escalated through restrictive legal proposals and coordinated attacks by far-right groups. The **Foreign Agents Bill**, introduced multiple times by the pro-Kremlin Revival Party, has sought to classify CSOs receiving foreign funding as threats to national security. Although not yet adopted, this legislation mirrors Russia's restrictive NGO laws, increasing public hostility and government scrutiny towards organisations advocating for human rights, democracy, and minority rights. Even without passing such legislation, the mere existence of these proposals fosters an atmosphere of fear and uncertainty among activists and NGOs, contributing to self-censorship and operational restrictions.<sup>41</sup>

The government's reluctance to support CSOs is also reflected in its refusal to engage with organisations in policy-making processes. The Bulgarian Ministry of Justice's decision to withhold information on the working group drafting amendments to the Judicial System Act exemplifies the lack of transparency and exclusionary practices that hinder civil society participation. Similarly, the failure of the Council for Civil Society Development to fulfil its mandate demonstrates the systemic disregard for civic engagement. Despite its responsibility to assess and address the needs of CSOs, the council has remained largely inactive, rendering it ineffective as a mechanism for institutional dialogue between the state and civil society. In addition, political pressure extends beyond legislation and bureaucratic barriers. The state's inaction regarding smear campaigns, hate speech, and physical attacks on activists emboldens perpetrators and further weakens the civic space. The rise of nationalist

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<sup>39</sup> OpenGov, Difesa dello spazio civico, 2023. Available at: [Difesa dello spazio civico | Italia Open Gov](#)

<sup>40</sup> Chiodi L., Epis S., Italian civil society: from target to antidote to the crisis of democracy?, CILD, October 2024.

<sup>41</sup> Human Rights Watch, "[Russia: New Restrictions for 'Foreign Agents'](#)", December 1, 2022.

rhetoric, often disseminated through pro-government media, has contributed to the stigmatisation of CSOs, particularly those working on LGBTQ+ rights, Roma advocacy, and environmental protection.<sup>42</sup>

In Cyprus, CSOs face significant challenges due to restrictive government policies, administrative burdens, and a lack of institutional support. Many organisations struggle with compliance requirements under the 2017 Associations and Foundations Law, which imposes excessive bureaucratic hurdles on smaller organisations. The lack of a clear and consistent legal framework, coupled with delays in administrative approvals, creates additional barriers to civic engagement. The banking sector has also contributed to the difficulties faced by CSOs, with financial institutions frequently categorising non-profits as high-risk entities. This results in arbitrary account closures, frozen funds, and financial transaction delays, further complicating the ability of CSOs to operate effectively. Political narratives portraying CSOs as foreign agents or politically motivated actors have reinforced public scepticism, limiting their ability to mobilise public support and engage in advocacy work.<sup>43</sup>

CSOs in Cyprus also report that state authorities often discourage open civic participation. Activists working on bicommunal initiatives, migrant rights, and human rights advocacy face significant pushback, with government institutions and nationalist groups portraying them as undermining national interests. The absence of structured legal and financial support mechanisms leaves many organisations vulnerable to political pressure, forcing them to rely on international donors rather than state resources. This external dependency reinforces negative narratives that question their legitimacy and autonomy. While formal restrictions may not be as severe as in Bulgaria or Greece, the combination of bureaucratic inefficiencies, financial instability, and political hostility creates a hostile environment for civic engagement.

Greece has also witnessed increasing political pressure on CSOs, particularly those working on migration, human rights, and media freedom. Legislative measures such as the 2020 NGO Registration Law have imposed stringent regulations on organisations providing aid to refugees and asylum seekers, making it difficult for them to operate. The law's complex administrative requirements and vague criteria for compliance have led to the exclusion of many humanitarian groups from official registries, effectively criminalising their work. Meanwhile, organisations critical of government policies, especially those investigating pushbacks of migrants at sea, have faced harassment, legal threats, and surveillance. In addition, Greek CSOs face a deeply polarised political landscape in which government actors and nationalist movements actively work to delegitimise their efforts. Media narratives depicting NGOs as facilitators of illegal migration or foreign-backed operatives have fuelled public distrust. Surveillance of activists and journalists, including the use of spyware such as Predator, has raised significant concerns about the erosion of press freedom and the state's efforts to suppress dissent. The legal system's failure to provide adequate protections for activists has further contributed to a climate of fear and repression, discouraging many from engaging in advocacy work.<sup>44</sup>

In Italy, political pressure on CSOs has manifested through legislative measures targeting migration, environmental activism, and freedom of expression. The Piantadosi Decree, the Cutro Decree, and the agreement with Albania on migrant transfers have collectively restricted the operations of humanitarian organisations working on search-and-rescue missions. These policies have framed NGOs

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<sup>42</sup> European Citizen Action Service, "[Bulgarian CSOs express concern over shrinking civic space in the country](#)", 17 July 2020.

<sup>43</sup> Civil Society Advocates, Civil Society Organisations (CSOs): 6/2023 Challenges in Relation to the Legal Operational Framework and Recommendations for Creating an Enabling Environment for CSOs in Cyprus, 2023.

<sup>44</sup> [World Justice Project: Rule of Law Index 2023 - govwatch](#)

as complicit in illegal migration, imposing bureaucratic and financial burdens that limit their ability to save lives at sea. Similarly, environmental activists have been subjected to criminalisation under the Eco-Vandals Bill, which imposes severe penalties on those engaging in civil disobedience to protest ecological destruction. These legal measures reflect a broader effort to delegitimise civic activism by associating it with criminal activity.<sup>45</sup>

Beyond legislative constraints, CSOs in Italy face challenges in securing public funding, as state resources increasingly favour organisations that align with government priorities. The reliance on private donations and international grants has left many smaller NGOs struggling to sustain their operations. Political narratives portraying CSOs as obstacles to economic growth or threats to national sovereignty have further diminished their public standing. In this climate, activists working on issues such as migrant rights, anti-racism, and social justice frequently encounter online harassment, legal intimidation, and smear campaigns. The increasing use of SLAPPs against journalists and advocacy groups has further restricted civic engagement by discouraging investigations into government misconduct and corporate abuses.<sup>46</sup>

The common thread across Bulgaria, Cyprus, Greece, and Italy is the use of political pressure to undermine the role of civil society in democratic governance. The primary consequence of this is the erosion of public trust and participation in democratic processes, a phenomenon that is both caused and fostered by far-right populism and other political factors. This, in turn, has a detrimental impact on organisations working on politically sensitive issues, leading to a continual shrinking of civic space.

### Common challenges

While the nature and extent of these restrictions vary, common patterns emerge in declining civic participation mechanisms, weak institutional monitoring, financial and bureaucratic barriers, and increasing political pressure.

Civic participation mechanisms have deteriorated across all four countries due to governance failures, restrictive legal frameworks, and institutional neglect. In Bulgaria and Cyprus, participatory structures remain largely ineffective, either due to bureaucratic inefficiencies or the lack of a structured framework ensuring CSO involvement in decision-making. In Greece and Italy, formal mechanisms exist but are often bypassed in practice, with CSOs reporting exclusion from key policy discussions. The declining engagement of CSOs in governance processes is further exacerbated by restrictive laws, administrative burdens, and a broader erosion of institutional transparency, leading to reduced influence over policy-making.

All four countries lack dedicated monitoring bodies to systematically track and address restrictions on civic space. In Bulgaria, the Council for Civil Society Development has failed to fulfil its role, leaving CSOs vulnerable to legal and political attacks without institutional protection. Cyprus lacks an independent oversight body, making it difficult for civil society actors to report cases of harassment or administrative barriers. In Greece, fragmented regulatory frameworks create uncertainty for CSOs, while in Italy, the absence of structured monitoring mechanisms means that restrictions on activism, including the increasing use of SLAPP lawsuits, go largely unchecked. This institutional inaction fosters

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<sup>45</sup> Giordano A., No security for rights. Human Rights Watch's World Report 2025 flunks Italy, *Altraeconomia*, January 2025.

<sup>46</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#)



an environment where legal harassment, smear campaigns, and political interference can persist without accountability.

Across the region, governments have imposed legal and bureaucratic restrictions that limit the operational capacity of CSOs. In Greece and Cyprus, stringent registration requirements create obstacles for organisations, with complex administrative procedures often used as a means of political control. Greece's overlapping registries and Cyprus' bureaucratic inconsistencies result in delays, compliance challenges, and financial instability for many organisations<sup>47</sup>. Similarly, Italy and Bulgaria impose administrative hurdles that disproportionately affect smaller and advocacy-oriented CSOs, limiting their ability to function independently. The inconsistent enforcement of legal provisions further complicates civic engagement, creating uncertainty for organisations seeking to operate within the legal framework.

Financial instability remains a major challenge for civil society across the four countries, with many organisations struggling to sustain long-term operations due to funding shortages and bureaucratic constraints. In Cyprus and Bulgaria, financial barriers are exacerbated by banking policies that classify CSOs as high-risk entities, leading to arbitrary account closures and restrictions on financial transactions. This classification undermines CSOs' ability to secure funding, making them overly reliant on international donors, which in turn fuels political narratives that portray them as foreign-controlled entities.<sup>48</sup> In Greece and Italy, restrictive financial oversight mechanisms have increased government scrutiny of CSOs engaged in politically sensitive areas, particularly those working on migration and human rights. In Italy, state intervention in funding allocation further marginalises organisations that do not align with government priorities, placing additional pressure on civil society actors advocating for social justice and human rights.

Political pressure on CSOs has intensified across the region, with governments implementing restrictive policies that limit advocacy efforts, particularly in migration, environmental activism, and human rights. In Greece and Italy, laws criminalising humanitarian assistance and civil activism have targeted organisations engaged in search-and-rescue operations and refugee support, fostering a climate of fear among activists. In Bulgaria and Cyprus, CSOs advocating for minority rights, LGBTQ+ inclusion, and environmental protections frequently face political smear campaigns that undermine their credibility and restrict their engagement in public discourse. Political narratives across all four countries have increasingly framed CSOs as obstacles to national security or economic progress, justifying restrictive measures that curtail civic space.

State surveillance and digital threats pose significant risks to civil society actors in Greece and Italy, where restrictive laws have enabled increased monitoring of activists and journalists. Greece's opaque legal framework on NGO registration has facilitated government scrutiny of organisations involved in migration and asylum-related activities<sup>49</sup>, while Italy's "Legge Bavaglio" threatens press freedom and investigative journalism.<sup>50</sup> The rise of digital attacks, smear campaigns, and misinformation further

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<sup>47</sup> Civil Society Advocates, Civil Society Organisations (CSOs): 6/2023 Challenges in Relation to the Legal Operational Framework and Recommendations for Creating an Enabling Environment for CSOs in Cyprus, 2023. [https://civilsocietyadvocates.org/images/Publications/forstronger-csos\\_wp2\\_report\\_challengesrecommendations\\_final\\_june2023.pdf](https://civilsocietyadvocates.org/images/Publications/forstronger-csos_wp2_report_challengesrecommendations_final_june2023.pdf)

<sup>48</sup> Yordanov and Zahariev Dynamics of the NGO Sector in Bulgaria. Sofia: Open Society Institute Sofia, 2023.

<sup>49</sup> Civic-Space-Report-2024\_ECF.pdf

<sup>50</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: LIBERTIES RULE OF LAW REPORT 2024



compounds the challenges faced by civil society actors, as governments and political factions use online platforms to delegitimise activism and discourage public support for advocacy initiatives.

Addressing these issues requires structural reforms, including enhanced institutional support for CSOs, the removal of legal and financial obstacles, and stronger protections against state surveillance and political repression. Without these measures, the ability of civil society to contribute to democratic resilience in Southern Europe will continue to be undermined.

## Public discourse and societal challenges for CSOs

The public discourse surrounding civil society organisations is shaped by a complex interplay of political, social, and economic factors. While CSOs play a crucial role in advocacy, human rights, and social services, their public perception is often influenced by media narratives, government rhetoric, and societal attitudes. In many cases, growing polarisation and disinformation campaigns have contributed to an increasingly challenging environment, affecting both public trust and operational capacity.

In several countries, CSOs face accusations of political bias, foreign influence, or elitism, which can undermine their credibility and restrict their ability to engage effectively with communities. Meanwhile, restrictive policies, administrative hurdles, and legal challenges further complicate their efforts to operate freely. At the same time, **shifts in civic participation trends**—such as the rise of grassroots movements and informal activism—reflect evolving societal dynamics that influence how civil society interacts with institutions and the wider public.

This chapter will examine the key trends shaping public discourse, the challenges they pose to CSOs, and possible strategies to strengthen public engagement, transparency, and resilience in an increasingly complex landscape.

### *Societal attitudes and their impact on civic space*

Public attitudes towards civil society organisations in Southern Europe are shaped by a combination of historical mistrust in institutions, political polarisation, media narratives, and broader societal divisions. While CSOs are widely acknowledged for their contributions to humanitarian efforts, social justice, and advocacy, they also face criticism and scepticism, particularly regarding their funding sources, perceived political affiliations, and engagement in contentious issues such as migration, LGBTQ+ rights, and environmental activism.

In Bulgaria, societal attitudes towards civil society remain highly polarised, shaped by geopolitical tensions, nationalist rhetoric, and disinformation campaigns. While surveys indicate a gradual improvement in public trust—from 31.3% in 2020 to 47.3% in 2024—this positive shift is mainly observed among urban, highly educated populations, whereas rural communities remain largely sceptical. Civil society is increasingly fragmented between progressive organisations advocating for human rights and democratic values and conservative, nationalist groups that actively oppose these movements. The growing influence of far-right organisations has been particularly evident in the mobilisation against LGBTQ+ rights, gender equality, and migration. Campaigns by nationalist and religious groups have successfully blocked the ratification of the Istanbul Convention and pushed

forward laws restricting LGBTQ+ representation, such as the 2024 ban on so-called "LGBT propaganda" in schools.<sup>51</sup>

Roma communities, migrants, and LGBTQ+ individuals remain highly vulnerable to discrimination, and CSOs advocating for their rights frequently face public hostility. Data from multiple surveys highlight a striking double standard in public attitudes towards refugees, particularly following Russia's invasion of Ukraine. While 53.5% of Bulgarians expressed positive views towards Ukrainian refugees, non-European migrants continue to be met with hostility, reflected in increased anti-migrant protests and incidents of violence. In 2023 alone, nearly 10,000 pushbacks were recorded at Bulgaria's borders with Türkiye and Greece, affecting over 174,000 individuals—more than double the number from the previous year. Anti-migrant sentiment escalated further in 2024, with violent attacks against Pakistani students and Afghan migrants in Sofia, as well as demonstrations against refugee centres. Simultaneously, nationalist groups exploit public fears by framing CSOs as "foreign agents" undermining national sovereignty, particularly those working on Roma inclusion, LGBTQ+ rights, and environmental protection. Smear campaigns accuse these organisations of misusing European funds, reinforcing public scepticism towards their work.<sup>52</sup>

Similarly, in Cyprus, while public perceptions of CSOs have improved over time, awareness of their role remains limited. The media landscape tends to focus on negative portrayals, reinforcing narratives of inefficiency or corruption rather than highlighting civil society's contributions. Funding transparency remains a significant concern, with segments of the population believing that CSOs serve foreign interests rather than acting independently. Nationalist and conservative actors continue to oppose organisations advocating for human rights and migration, portraying them as politically motivated. However, grassroots activism is growing, particularly among younger generations, who are shifting towards more informal civic engagement, challenging traditional models of organised civil society. CSOs in Cyprus also face significant bureaucratic hurdles, with complex regulatory frameworks disproportionately affecting smaller organisations, particularly those operating outside the capital.<sup>53</sup>

In Greece, civil society remains relatively underdeveloped compared to other European countries, largely due to historical reliance on state structures and clientelism. While public trust has gradually improved, awareness of CSOs' work remains low, with only 38.1% of Greeks familiar with civil society activities. When individuals are exposed to CSO initiatives, support increases significantly, suggesting that lack of knowledge, rather than outright opposition, is a primary barrier to greater civic engagement. Nevertheless, advocacy organisations focusing on migration, LGBTQ+ rights, and environmental issues face strong opposition from conservative and nationalist groups. Media narratives further reinforce scepticism, often framing activism as disruptive rather than constructive. The legal landscape also presents challenges, as vague legislation and excessive bureaucratic demands hinder the operation of civil society, with some organisations struggling to maintain financial stability due to inconsistent regulations.<sup>54</sup>

<sup>51</sup> Glas foundation, Public attitudes towards LGBTI+ 2024, March 1, 2024.

<sup>52</sup> ECRE, AIDA Country Report on Bulgaria – 2023 Update, 2024.

<sup>53</sup> Civil Society Advocates, (2023). Civil Society Organisations (CSOs): 6/2023 Challenges in Relation to the Legal Operational Framework and Recommendations for Creating an Enabling Environment for CSOs in Cyprus. <https://civilsocietyadvocates.org/images/Publications/for stronger-csos wp2 report challengesrecommendations final june2023.pdf>

<sup>54</sup> Marangudakis, M., K. Rontos, and M. Xenitidou, State Crisis and Civil Consciousness in Greece. GreeSE – Hellenic Observatory Papers on Greece and Southeast Europe 77, 2013.

In Italy, public opinion towards CSOs is deeply polarised, reflecting broader political divisions. Many Italians appreciate the role of CSOs in humanitarian crises, disaster relief, and social services, with organisations like Caritas Italia and Emergency enjoying widespread support. However, advocacy groups working on migration, climate justice, and civil rights face increasing criticism. NGOs engaged in Mediterranean search-and-rescue operations are simultaneously praised in humanitarian circles and accused of facilitating irregular migration by conservative factions. Environmental activists, particularly those affiliated with movements such as Fridays for Future, are either celebrated for their advocacy or labelled as extremists. In recent years, political discourse has increasingly sought to delegitimise CSOs that engage in activism or policy advocacy, leading to a rise in restrictive measures. Legislative initiatives such as Decree Law No. 1/2023, the Cutro Decree, and the Eco-Vandals Bill have placed significant limitations on civil society actors, particularly those involved in migration and environmental issues. Activists also report an increased sense of fatigue and disillusionment, as bureaucratic restrictions and political hostility make long-term advocacy efforts more difficult to sustain.<sup>55</sup>

A common challenge across all four countries is the role of digital platforms in shaping public attitudes. While social media has allowed CSOs to mobilise support, reach younger audiences, and counter misinformation, it has also made them vulnerable to smear campaigns, online harassment, and algorithmic suppression. In Bulgaria and Italy, narratives depicting CSOs as foreign-controlled entities have gained traction, reinforcing public distrust. In Cyprus and Greece, the limited visibility of civil society makes organisations more susceptible to misinformation and public apathy. Activists across the region report significant difficulties in combating online disinformation, as digital platforms amplify hostile rhetoric against human rights organisations, environmental groups, and migrant advocacy initiatives.

Media coverage continues to play a crucial role in shaping public perception, with positive reporting often focusing on humanitarian efforts while negative coverage amplifies scandals, financial mismanagement, or administrative failures. In Bulgaria, nationalist parties and fringe media outlets frequently use derogatory terms to undermine progressive CSOs, portraying them as "grant-seekers" or "foreign agents" exploiting international funding. In Italy, CSOs involved in crisis response are widely praised, while those engaged in advocacy face scrutiny and politicisation. In Greece, investigative journalists exposing human rights violations have faced legal and institutional pushback, making it increasingly difficult for civil society actors to operate freely. In Cyprus, the lack of independent investigative journalism has contributed to public disengagement, allowing misinformation to shape attitudes towards CSOs.

Another key factor influencing societal attitudes is the relationship between CSOs and governments. While some national and regional authorities have integrated CSOs into policymaking and service delivery, others have imposed restrictive measures. In Bulgaria, nationalist politicians have actively pushed for laws targeting foreign-funded organisations, while in Italy, policies such as the Cutro Decree and the Eco-Vandals Bill have significantly limited the role of CSOs in policymaking. In Greece and Cyprus, state-CSO relations are often marked by bureaucratic inefficiencies rather than outright hostility, yet access to funding and legal compliance remain major obstacles for organisations. In all four countries, the increasing political polarisation of civil society has contributed to a more contested

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<sup>55</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#)

environment, where certain organisations receive state backing while others face public and institutional opposition.<sup>56</sup>

Despite these challenges, civil society remains resilient. In Bulgaria, despite widespread political and social divisions, civic engagement has increased, with volunteering and donations rising in response to crises such as the war in Ukraine. In Cyprus, youth-led initiatives are gaining momentum, providing alternative spaces for civic participation. In Greece, while institutional trust remains low, public support for charitable foundations continues to grow. In Italy, social justice movements maintain a strong presence, even as political opposition to advocacy organisations intensifies.

### *Trends in public discourse on CSOs*

Public discourse on civil society organisations in Southern Europe has become increasingly politicised, shaped by media narratives, ideological divides, and government rhetoric. While CSOs engaged in humanitarian aid, social services, and disaster relief generally enjoy positive recognition, those involved in human rights, migration, and environmental activism often face hostility, mistrust, and political attacks.

In Bulgaria, civil society has been heavily targeted by disinformation campaigns, often fuelled by far-right and pro-Kremlin actors who frame CSOs as agents of foreign influence. The country ranks among the lowest in Europe in media literacy, making it particularly vulnerable to misinformation and smear campaigns. Narratives linking CSOs to Western interference, LGBTQ+ advocacy, and migrant support have contributed to public scepticism and government hostility, leading to growing calls for restrictive legislation such as the proposed Foreign Agents Law. Many CSOs are labelled as "grant-seekers"—accused of exploiting European or international funding—or "Sorosoids", a term used to discredit organisations allegedly linked to George Soros and liberal democratic movements. These attacks have intensified in recent years, aligning with broader anti-Western and nationalist rhetoric that portrays civil society actors as a threat to national sovereignty.<sup>57</sup>

Disinformation campaigns in Bulgaria have increasingly targeted specific groups such as LGBTQ+ communities, migrants, Roma people, and environmental activists. Political and media narratives have framed these organisations as undermining Bulgarian traditions and values, often portraying them as foreign-funded operatives. The far-right Revival Party, which has seen growing political success, has played a central role in amplifying these narratives, benefiting from a significant presence on social media. Revival has also been instrumental in pushing for legislation restricting CSO operations, including recent efforts to ban LGBTQ+ "propaganda" in schools, which received substantial backing from conservative civil society groups.<sup>58</sup>

Moreover, political rhetoric frequently portrays progressive CSOs as out-of-touch elites, using derogatory labels such as "yellow-pavers" (a term referring to urban-based activists in Sofia) to discredit pro-European movements. Environmental CSOs have also faced smear campaigns, being branded as "eco-racketeers" who supposedly block economic progress. These narratives have gained

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<sup>56</sup> Ibidem.

<sup>57</sup> Yordanov and Zahariev, Dynamics of the NGO Sector in Bulgaria. Sofia: Open Society Institute Sofia, 2023

<sup>58</sup> Vatsov, D. Anti-Democratic Propaganda in Bulgaria. Part One. News Websites and Print Media: 2013 – 2016, Sofia: Humanitarian and Social Research Foundation, 2017.

traction particularly in opposition to EU environmental policies such as the Green Deal, with CSOs accused of prioritising international agendas over national interests.

In Cyprus, public perceptions of CSOs are largely shaped by historical divisions and political sensitivities, with organisations primarily associated with philanthropy and social welfare rather than human rights advocacy. While the sector has gained more visibility in policy discussions, many Cypriots remain sceptical about foreign-funded initiatives. The legacy of the political division within the island continues to influence attitudes, as CSOs that engaged in bicomunal reconciliation efforts in the past were accused of being "traitors" serving external interests. This narrative has weakened over time, but concerns about funding transparency and political alignment persist, particularly regarding organisations working on minority rights and migration.<sup>59</sup>

Another key challenge in Cyprus is the bureaucratic complexity surrounding CSOs, which often hinders their ability to operate effectively. Government regulations require detailed financial disclosures and compliance with complex governance structures, disproportionately affecting smaller organisations. Additionally, while physical threats remain rare, digital harassment has increased, particularly against organisations advocating for migration policies or LGBTQ+ rights. Political leaders occasionally exploit nationalist rhetoric to delegitimise CSOs engaged in sensitive areas, further restricting their influence in public discourse.

Greece presents a unique case where civil society remains relatively underdeveloped, largely due to historical patterns of clientelism and political patronage. Many organisations continue to depend on state and EU funding, which has contributed to low levels of grassroots engagement and public trust. While humanitarian organisations and charitable foundations enjoy high approval ratings, advocacy groups—especially those focused on migration, LGBTQ+ rights, and environmental issues—face significant public scepticism and political resistance. Media narratives have played a key role in shaping discourse, with coverage often focusing on corruption scandals, inefficiencies, or political affiliations, reinforcing negative perceptions of civil society.<sup>60</sup>

Greek civil society actors working in refugee protection, gender equality, and democratic monitoring have reported increasing restrictions, both from direct state intervention and hostile public discourse. Strategic lawsuits against public participation (SLAPPs) have been used against organisations exposing human rights violations, particularly in cases of migrant pushbacks and police brutality. The legal environment remains ambiguous, with unclear regulations on NGO registration and funding creating additional hurdles for CSOs. Meanwhile, surveillance scandals targeting journalists and activists have further contributed to an atmosphere of repression, discouraging civic engagement.<sup>61</sup>

A similar dynamic to that analysed for Bulgaria is evident in Italy, where migration-focused CSOs and environmental activists have faced growing public backlash and political restrictions. While organisations engaged in local governance, healthcare, and social services continue to collaborate with authorities, those involved in search-and-rescue operations in the Mediterranean are increasingly framed as complicit in illegal migration. Government policies such as Decree Law No. 1/2023 have sought to limit their operations, while public donations to migration-related organisations have declined, reflecting a shift in societal attitudes. Environmental movements like

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<sup>59</sup> [ATTITUDES AND PERCEPTIONS OF TURKISH CYPRIOT COMMUNITY TOWARDS CIVIL SOCIETY VOLUNTEERING AND DONATION](#)

<sup>60</sup> <https://doi.org/10.1093/oxfordhb/9780198825104.013.22>

<sup>61</sup> Marangudakis, M., K. Rontos, and M. Xenitidou, State Crisis and Civil Consciousness in Greece. GreeSE – Hellenic Observatory Papers on Greece and Southeast Europe 77, 2013.



Fridays for Future have been praised for their mobilisation capacity but also criticised for their disruptive protests, with media narratives often oscillating between support for climate activism and portrayals of radicalism.<sup>62</sup>

Public discourse in Italy reflects an increasingly polarised civic space, where CSOs operating in politically sensitive areas face heightened scrutiny. Activists have expressed concerns over restrictive laws such as the Piantadosi Decree and the Caivano Decree, which impose bureaucratic and financial obstacles to civic engagement. Media coverage has played a crucial role in shaping perceptions, often depicting advocacy organisations as self-serving entities rather than legitimate actors in democratic governance.<sup>63</sup> The narrative around migration-related NGOs is particularly hostile, with claims that they act as facilitators of illegal migration and contribute to national security risks. In addition to legal restrictions, smear campaigns on social media have significantly impacted their ability to secure funding and mobilise public support.<sup>64</sup>

Across all four countries, the politicisation of civil society has led to growing divisions in public opinion, with state-aligned CSOs benefiting from institutional support, while progressive organisations advocating for human rights, migration, and environmental protection face increasing scrutiny and restrictions. In Bulgaria and Italy, government rhetoric has become openly hostile towards specific CSOs, portraying them as enablers of illegal migration or agents of foreign influence. In Cyprus and Greece, civil society actors encounter bureaucratic hurdles and limited public awareness, which restricts their impact and visibility.

A common theme is the role of disinformation in shaping negative narratives about CSOs, particularly in Bulgaria and Italy, where far-right and nationalist groups have actively promoted conspiracy theories linking civil society to external control. In Bulgaria, CSOs advocating for LGBTQ+ rights, minority protections, and European integration are frequently subjected to derogatory labels and smear campaigns, a tactic also observed in Italian and Greek media discourse, where activists and advocacy groups are often depicted as elitist, disconnected from national interests, or ideologically extreme.

Despite these challenges, there are emerging opportunities for positive engagement, particularly through local-level partnerships and youth-led activism. In Cyprus and Greece, younger generations are increasingly involved in informal civic initiatives, reflecting a shift towards decentralised and grassroots activism. In Italy, CSOs continue to play a critical role in social policy implementation, and in Bulgaria, despite hostile narratives, civic engagement has increased in times of crisis, such as the COVID-19 pandemic and the war in Ukraine.

Public discourse on CSOs in Southern Europe is shaped by political tensions, ideological divisions, and media narratives, with state support and public trust highly dependent on the sector's perceived alignment with national priorities. While humanitarian and social welfare efforts are broadly appreciated, organisations engaged in advocacy and rights-based work continue to face barriers to public acceptance, funding, and operational freedom. Addressing these challenges requires greater

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<sup>62</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#)

<sup>63</sup> Milo D., Resilient Together: How Civil Society Organizations Can Counter Disinformation and Build Stronger Communities, Hive Mind, December 2024.

<sup>64</sup> Emergency, Joint Statement: Italy's obstruction of search and rescue activities in endangering people's lives, Press room, February 2024. Available at: [Joint Statement: Italy's obstruction of search and rescue activities is endangering people's lives | EMERGENCY](#)



transparency, strategic communication, and strengthened public engagement efforts to counteract misinformation and reinforce the legitimacy of civil society.

### *Smearing campaigns, attacks, and digital threats on CSOs*

Across Southern Europe, civil society organisations (CSOs) are increasingly subjected to smear campaigns and digital threats, which significantly undermine their credibility, restrict their operations, and discourage public engagement. These campaigns often emanate from political actors, media outlets, and interest groups aiming to weaken advocacy efforts in human rights, migration, environmental justice, and minority rights. The use of misinformation, legal harassment, and digital intimidation creates a hostile environment for civil society actors, leading to self-censorship, reputational damage, and, in extreme cases, physical violence.

In Bulgaria, smear campaigns against CSOs have intensified, particularly targeting human rights defenders, LGBTQ+ rights activists, organisations supporting migrants and Roma communities, and environmental groups. These attacks come both from far-right groups and nationalist political parties, particularly the pro-Kremlin Revival Party. The continuous attempts to pass the Foreign Agents Bill, which seeks to label foreign-funded NGOs as national security threats, have been a key element of the state's efforts to discredit civil society. Public smear campaigns frequently portray these organisations as "grant-seekers" or "Sorosoids," accusing them of serving foreign interests and undermining national sovereignty. Disinformation about LGBTQ+ rights organisations and environmental activists is spread through online platforms, further fueling public distrust.<sup>65</sup>

In recent years, the vilification of NGOs working with migrants has intensified. While organisations aiding Ukrainian refugees have been widely praised, CSOs supporting non-European migrants face criminalisation and legal scrutiny. A troubling case involved the Mission Krile Foundation, accused of migrant smuggling, with its staff interrogated by security services, reinforcing the hostile narrative against CSOs in this sector. Additionally, Roma advocacy groups are persistently targeted with allegations of financial mismanagement, further entrenching societal discrimination. Violent incidents have also been recorded, such as the 2021 attack on the Rainbow Hub LGBTQ+ centre, which was vandalised by far-right militants led by a nationalist politician. The lenient judicial response to these attacks reflects institutional reluctance to address hate crimes against minorities.<sup>66</sup>

Environmental activists in Bulgaria have faced a particularly aggressive smear campaign, with digital and physical threats becoming commonplace. In 2024, billboards appeared in major cities labelling prominent environmentalists as "eco-racketeers," blaming them for economic stagnation. At the same time, SLAPP cases against environmental CSOs have surged, aiming to silence critics of large-scale infrastructure projects. Moreover, in the digital sphere, Russian-affiliated hacker groups such as Killnet have launched DDoS attacks on independent media, human rights NGOs, and political dissidents. The lack of a coordinated cybersecurity response has left many CSOs vulnerable to these digital threats, exposing critical gaps in national cybersecurity frameworks.

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<sup>65</sup> Stoyanova, M., [Legal environment and space of civil society organisations in supporting fundamental rights and the rule of law](#). Bulgaria: Center for the Study of Democracy/European Union Agency for Fundamental Rights, January 2022.

<sup>66</sup> CSD, [Against Fake News and Anti-Roma Disinformation](#). Sofia: CSD, 2022.

In Cyprus, CSOs engaged in bicomunal initiatives and human rights advocacy face persistent smear campaigns that portray them as foreign-backed entities. A longstanding narrative paints these organisations as traitorous for engaging in cross-community cooperation between Greek Cypriots and Turkish Cypriots. While the severity of these attacks has diminished compared to the period following the 2004 Annan Plan referendum, nationalist rhetoric continues to question the legitimacy of CSOs working towards reconciliation. Misinformation campaigns frequently target organisations advocating for migrant and LGBTQ+ rights, with accusations that they promote external agendas. Online harassment is a growing concern, as CSOs find themselves subjected to misinformation and defamation spread through social media.<sup>67</sup>

In Greece, CSOs working on migration, LGBTQ+ rights, and democratic accountability face severe repression, characterised by criminalisation, state surveillance, and legal harassment. The crackdown on NGOs assisting migrants and asylum seekers has been particularly pronounced. The criminal prosecution of humanitarian workers, such as the trial against activists involved in search-and-rescue operations on Lesbos, illustrates the increasing criminalisation of solidarity efforts. Despite international condemnation, Greek authorities continue to pursue legal action against migrant solidarity organisations. Additionally, SLAPP cases against investigative journalists and advocacy groups exposing state corruption and human rights violations have increased, significantly restricting press freedom and civil society's capacity to hold authorities accountable.<sup>68</sup>

Government surveillance measures further exacerbate the restrictive civic environment in Greece. The Predator spyware scandal exposed systematic surveillance of journalists, opposition politicians, and activists, highlighting the state's aggressive efforts to monitor and suppress dissent. Legal and regulatory measures have also been used to limit the influence of independent media and critical voices. In December 2022, a controversial law was passed, granting a government-controlled committee the power to regulate online news outlets, raising concerns that critical media may be excluded from state funding and advertising. This has led to a shrinking space for independent journalism and increased pressure on CSOs advocating for transparency and human rights.

In Italy, CSOs working on migration, environmental justice, and labour rights are frequently targeted by smear campaigns and restrictive policies. Migration-focused organisations, particularly those involved in search-and-rescue missions in the Mediterranean, have faced relentless attacks from political figures accusing them of facilitating illegal migration. Decree Law No. 1/2023 imposed severe operational and financial constraints on these organisations, limiting their ability to conduct life-saving missions. Similarly, environmental activists have been labelled as "eco-terrorists," and their civil disobedience actions criminalised under the Eco-Vandals Bill. These narratives, reinforced by state-aligned media, depict CSOs as obstacles to economic progress and national security.<sup>69</sup>

Labour rights organisations in Italy have also been subjected to legal harassment and corporate-backed attacks. Groups advocating for migrant workers have been accused of disrupting economic productivity, with pro-business media framing them as anti-growth entities. Additionally, digital threats and online smear campaigns have been used to undermine CSOs' credibility, discouraging

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<sup>67</sup> Infakto Research Workshop, Attitudes and perceptions of Turkish Cypriot community towards civil society volunteering and donation, 2015.

<sup>68</sup> [CIVIC SPACE REPORT](#)

<sup>69</sup> Chiodi L., Epis S., Italian civil society: from target to antidote to the crisis of democracy?, CILD, October 2024.

public support and engagement. Cyberattacks targeting advocacy organisations have increased, further complicating their ability to operate freely.<sup>70</sup>

Across all four countries, smear campaigns and digital threats are actively used to weaken civil society. In Bulgaria, far-right political forces and state-backed legislative efforts seek to criminalise NGOs receiving foreign funding. In Cyprus, nationalist narratives persist, particularly against organisations engaged in bicomunal cooperation and human rights advocacy. In Greece, criminal trials against CSOs assisting migrants, government surveillance, and legal harassment of journalists reflect an increasingly repressive civic environment. In Italy, state-led smearing campaigns, legal constraints on migration and environmental activism, and corporate-driven attacks on labour rights groups contribute to a shrinking civic space.

The rise of digital threats, including cyberattacks, misinformation, and SLAPP cases, further exacerbates the situation, limiting CSOs' ability to operate freely. Without stronger legal safeguards, increased transparency, and enhanced cybersecurity protections, civil society will remain vulnerable to politically motivated attacks and systemic restrictions.

## Conclusions and recommendations

Protecting civic space in Southern Europe requires coordinated action among governments, civil society, the private sector, and international organizations. While CSOs remain at the forefront of defending democracy, human rights, and social justice, they cannot do so alone. A concerted effort to repeal restrictive laws, counter disinformation, secure financial stability, and strengthen cybersecurity is essential to ensuring that civil society remains a powerful force for democratic resilience in Bulgaria, Italy, Cyprus, and Greece.

Across Southern Europe, civic space is undergoing increasing pressure from legal restrictions, political hostility, and societal polarization. While CSOs play a crucial role in upholding democratic principles, protecting human rights, and addressing gaps left by state institutions, they are increasingly subjected to smearing campaigns, legal harassment, bureaucratic obstacles, and financial instability.

In all four countries—Bulgaria, Italy, Cyprus, and Greece—legislative and administrative barriers hinder the work of CSOs. In Bulgaria, the Foreign Agents Registration Draft Bill and laws restricting LGBTQ+ advocacy have contributed to an increasingly repressive legal landscape, mirroring efforts seen in Hungary and Russia. Italy has introduced laws like the **Piantadosi Decree** and **DDL Eco-Vandali**, which target migration-focused and environmental CSOs, limiting their ability to conduct humanitarian and advocacy work. Greece has similarly imposed excessive registration and reporting requirements, which disproportionately impact organizations assisting migrants, while Cyprus' legal framework remains plagued by bureaucratic inefficiencies and inconsistent enforcement.

Bureaucratic burdens are another major issue, particularly in Cyprus, where NGOs struggle with an outdated registration system and excessive compliance requirements. In Greece, confusing legal definitions and the lack of a coherent national policy for civil society further complicate CSOs' operational environment. These legislative and administrative constraints create an atmosphere of insecurity, making it increasingly difficult for CSOs to function effectively.

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<sup>70</sup> CILD, Liberties Rule of Law Report 2024 - Italy, 2024. Available at: [LIBERTIES RULE OF LAW REPORT 2024](#)

A common trend across the region is the systematic discrediting of CSOs through smearing campaigns and public distrust fueled by far-right and nationalist actors. In Bulgaria, anti-Western rhetoric and conspiracy narratives frame civil society actors as "foreign agents" or "grant-seekers," particularly those advocating for human rights, LGBTQ+ equality, and minority rights. The **America for Bulgaria Foundation** has been repeatedly targeted, while organizations working with non-European migrants face criminalization and legal scrutiny.

Italy follows a similar pattern, where CSOs involved in sea rescue operations are labeled as "sea taxis" aiding illegal migration, and environmental activists are portrayed as "eco-terrorists" under the **Eco-Vandals Bill**. In Greece, state rhetoric against migration-focused NGOs has contributed to legal harassment, with trials against humanitarian workers reinforcing an atmosphere of repression. Cyprus, while experiencing fewer physical attacks, has seen CSOs involved in bicomunal cooperation and migrant rights advocacy framed as traitorous or foreign-controlled entities.

Financial instability is a persistent issue across the region, with CSOs heavily reliant on international funding, often due to minimal state support. In Bulgaria, financial dependence on EU grants leaves organizations vulnerable to shifts in donor priorities and attacks labeling them as externally controlled. Italy's civil society faces increasing difficulty in securing public funding, with growing bureaucratic hurdles limiting access to both domestic and EU funds. In Cyprus, lack of sustainable financing forces CSOs to rely on short-term project-based funding, making long-term strategic planning nearly impossible. Greece's situation reflects similar patterns, where many CSOs depend on international funding but face growing regulatory scrutiny that restricts their ability to operate freely.

Cyberattacks, online disinformation campaigns, and digital threats represent an emerging and underreported challenge for CSOs in Southern Europe. In Bulgaria, Russian-affiliated hacker groups have targeted civil society actors and independent media outlets, while disinformation campaigns actively discredit pro-European and progressive movements. Similar trends are observed in Italy and Greece, where smear campaigns and SLAPP cases are increasingly used to silence journalists and activists. In Cyprus, digital threats primarily manifest in social media harassment and misinformation campaigns targeting organizations engaged in human rights and migration advocacy.

These digital threats not only damage the reputation of CSOs but also create an environment of self-censorship, discouraging activism and public engagement. The lack of coordinated cybersecurity strategies and protection mechanisms leaves many organizations vulnerable, further undermining their ability to operate freely.

Despite these challenges, civil society in Southern Europe remains resilient. In Bulgaria, CSOs have mobilized effectively during crises such as the COVID-19 pandemic and the war in Ukraine, demonstrating their critical role in social cohesion. In Italy, grassroots movements continue to thrive at the local level, even as national policies grow more restrictive. In Greece, public trust in CSOs has increased in certain areas, particularly regarding social services, while Cyprus has seen a growing youth engagement in civic initiatives.

However, to sustain and expand civic space, substantial reforms and stronger protections are necessary. Addressing legislative constraints, countering disinformation, ensuring financial sustainability, and enhancing cybersecurity are crucial steps toward safeguarding civil society in the region.

## *Recommendations for improving civic space and protecting CSOs*

To counter the increasing restrictions on civic space across Bulgaria, Cyprus, Greece, and Italy, a coordinated and strategic approach is needed to CSOs and safeguard their role in democratic governance. The following recommendations focus on legal and policy reforms, financial sustainability, countering smear campaigns, digital security, and fostering collaboration, with an emphasis on practical and actionable measures.

### **Legal Protections and Policy Reforms**

Ideally, governments should prioritise reforms that remove legal and administrative barriers limiting CSOs' ability to operate freely.

- **Repealing restrictive laws** that criminalise humanitarian assistance, restrict advocacy, or impose excessive bureaucratic burdens would enhance civic space. Revising laws that hinder CSO registration (Greece, Cyprus), penalise search-and-rescue missions (Italy, Greece), or impose arbitrary administrative restrictions (Bulgaria) should be considered.
- **Strengthening legal frameworks** to safeguard CSOs' free and safe operation, including cooperation with international organisations.
- **Introducing anti-SLAPP legislation** would help protect activists, journalists and CSOs from malicious lawsuits designed to suppress dissent. A dedicated legal framework could ensure the swift dismissal of abusive litigation.
- **Streamlining NGO registration and reporting processes** by eliminating excessive documentation requirements and harmonising national databases could reduce administrative burdens. In Greece and Cyprus, simplifying bureaucratic procedures might help new organisations become operational more efficiently.
- **Strengthening protections against hate speech, harassment and SLAPP practices**, could help counter online and offline attacks targeting CSOs, particularly those advocating for minority rights, migration and environmental justice. Enforcing stricter penalties for public figures and media actors who engage in smear campaigns may contribute to a safer civic environment.

### **Fostering Financial Sustainability**

Ensuring financial stability is crucial for CSOs' long-term resilience. Ideally, governments and independent institutions should implement mechanisms that promote sustainable funding.

- **Expanding access to public funding** through transparent allocation mechanisms that do not disproportionately favour government-aligned organisations would contribute to a more balanced civic space.
- **Improving financial regulations** to remove barriers that classify CSOs as "high-risk entities" (Cyprus, Bulgaria) could facilitate their access to banking services and funding opportunities.
- **Encouraging corporate and philanthropic partnerships** would help diversify funding sources, ensuring that CSOs are not solely dependent on international donors, which can make them vulnerable to political attacks.

- **Facilitating alternative fundraising methods**, such as crowdfunding and micro-donations, by reducing regulatory restrictions and improving transparency and public trust in non-profit financial management.

### **Strengthening Communication and Public Awareness**

Addressing misinformation and public hostility towards CSOs would require proactive engagement and narrative-building strategies.

- **Launching public awareness campaigns** could highlight CSOs' contributions to democratic governance, social services and human rights. Integrating civil society actors into national civic education initiatives might improve public perception.
- **Holding media accountable for disinformation** through stronger journalistic ethics standards and penalties for outlets that systematically spread false narratives about CSOs could reduce the impact of smear campaigns.
- **Equipping CSOs with communication strategies** by providing media training, digital advocacy tools and crisis response mechanisms could enhance their ability to counter misinformation and political attacks.

### **Strengthening Digital Security and Combating Cyber Threats**

As online threats against CSOs increase, targeted measures should be considered to enhance digital security and counteract cyberattacks.

- **Providing cybersecurity training for CSOs**, particularly those working in politically sensitive areas, could help protect them against hacking, surveillance, and online harassment.
- **Establishing national and regional reporting mechanisms** to document and respond to cyber threats might ensure that attacks on civil society actors receive appropriate institutional responses.
- **Increasing cooperation between CSOs and digital platforms** could help mitigate algorithmic suppression of advocacy-related content and improve access to secure communication channels.
- **Implementing national policies to enhance protection** against cyber attacks and other security risks.

### **Fostering Collaboration and Participation in Decision-Making**

A structured dialogue between CSOs, governments, and international institutions could help strengthen civic space.

- **Institutionalising structured dialogue** through formal consultation mechanisms might allow CSOs to engage in policymaking processes more effectively.
- **Investing in youth engagement** through civic education programmes, volunteer networks, and training opportunities might help cultivate the next generation of civil society leaders.
- **Establishing permanent advisory councils**, like Bulgaria's Council for the Development of Civil Society.



### Promoting cross-border cooperation

Addressing the geographical unbalance of CSOs in rural and urban areas, through enhanced cooperation, is essential for countering the shrinking of civic space.

- **Supporting regional networks** could facilitate knowledge-sharing, collective advocacy, and joint legal strategies to counter restrictive policies.
- **Increasing support for CSOs in Rural and Peripheral Areas.**
- **Strengthening anti-discrimination laws** to protect CSOs advocating for marginalized communities.
- **Encouraging cross-border collaboration** to foster regional stability, particularly in societies with strong social and ethnical division procedures to reduce bureaucratic obstacles.

## Annexes

### *Breakdown of respondent profiles in Bulgaria*

Interview	Age group	Gender	Role/profession	Field of work
1	35-55	Male	Journalist, CSO Director	Human rights, social inclusion, civic education
2	55-65	Male	CSO Director, Activist, social worker, researcher	Prison systems, crime prevention, social inclusion
3	35-55	Male	Economist, researcher	Market economy, civic education
4	35-55	Female	Activist, Social Worker, Founder and director of a CSO	Low-threshold support for people addicted to drugs and alcohol, harm reduction-based health care
5	35-55	Female	Activist and CSO director	Ecology, Green policies, Nature conservation

Focus Group 1	Age group	Gender	Role/profession	Field of work
1	25-35	Male	Activist, journalist	Inclusion of Roma communities, Civic education
2	35-55	Female	Activist, political scientist manager	Anti-corruption, Rule of law

3	35-55	Female	Activist, doctor and volunteer	Rights of people with rare diseases; accessibility of the environment, accessibility to education; legislative reforms
4	55-65	Female	Activist, CSO founder and director	Countering and prevention of human trafficking; victims support
5	25-35	Female	Activist, Project Manager, Lawyer	Human rights, gender equality, LGBT rights

Focus Group 2	Age group	Gender	Role/profession	Field of work
1	25-35	Female	Project manager and activist	LGBT rights, human rights, gender equality
2	35-55	Male	Activist, CSO director	Inclusion of Roma communities, human rights
3	35-55	Female	Journalist, Activist	Human rights, migrant rights
4	25-35	Male	Activist and Project manager	Rights of transgender people, Human rights, LGBT rights, gender equality
5	35-55	Female	Activist, CSO director	Migrants and refugees' rights

### *Breakdown of respondent profiles in Cyprus*

Interview	Age group	Gender	Role/profession	Field of work
1	35-55	Female	Activist and NGO worker	Human rights, Bicomunal initiatives
2	35-55	Female	Activist and NGO worker	Volunteerism, Advocacy

Interview	Age group	Gender	Role/profession	Field of work
				movements, human rights
3	35-55	Female	Activist and youth worker	Human rights
4	35-55	Female	Activist and NGO worker	Volunteerism, Advocacy movements, human rights
5	35-55	Female	Lawyer and activist	Human rights, advocacy, bicomunal
6	35-55	Male	Organisation Vice President	Advocacy, Organizational growth, Policy influence

Focus Group 1	Age group	Gender	Role/profession	Field of work
1	25-35	Female	Activist	Human rights
2	25-35	Female	Activist	Human rights and bicomunal
3	25-35	Female	Researcher and Criminologist	Gender- based violence, human rights, Social inclusion, criminology
4	25-35	Female	Human rights lawyer	Human rights, LGBTQI+
5	25-35	Male	Youth Worker	Human rights, environment

Focus Group 2	Age group	Gender	Role/profession	Field of work
1	25-35	Female	Journalist and activist	Human rights, refugees, migration, LGBTQI+, Environment
2	25-35	Female	Lawyer and activist	Human rights and gender-based violence
3	25-35	Male	Youth worker and activist	LGBTQI+
4	25-35	Male	EU officer and activist	Human rights and refugees advocacy

Focus Group 2	Age group	Gender	Role/profession	Field of work
5	35-55	Female	NGO worker	Domestic violence, gender based violence

### *Breakdown of respondent profiles in Greece*

Interview	Age group	Gender	Role/profession	Field of work
1	50-60	Male	Founder and director of an NGO	Human rights
2	30-45	Male	Founder, Project Manager and Development	Monitoring Parliament and Enhancing Democracy
3	25-35	Female	Project Manager/Researcher	Youth and Racism
4	25-35	Male	Project Manager/Researcher	Youth and Racism
5	25-35	Male	Project Manager/Researcher	Refugee Protection

Focus Group 1	Age group	Gender	Role/profession	Field of work
1	30-45	Female	In charge of child protection	Child protection
2	30-45	Female	Trainer, Management and Development	Gender Equality
3	30-45	Female	Project Management	Youth protection and gender equality



Focus Group 1	Age group	Gender	Role/profession	Field of work
4	30-45	Female	Project Management	Youth association that strives for universal human values, peace, progress, prosperity and environmental protection.

Focus Group 2	Age group	Gender	Role/profession	Field of work
1	40-55	Male	Project Manager	Child Protection
2	25-35	Male	First-line worker	Crisis management and social support
3	35-50	Male	Project Management and Development	Gender Equality
4	35-50	Female	Project Management/ Advisor	Child Protection
5	50-65	Male	Social Worker	Child and Refugee Protection
6	30-45	Female	Project Manager/Researcher	Human Rights

### *Breakdown of respondent profiles in Italy*

Interview	Age group	Gender	Role/profession	Field of work
1	55-65	Male	Lawyer and civic activist	Child protection, refugees protection
2	25-35	Female	Disseminator, activist, trainer, writer	Anti-racism and anti-discrimination education, social inclusion

Interview	Age group	Gender	Role/profession	Field of work
3	35-55	Male	Director of a voluntary association	Volunteering, restoration of vandalised and degraded public property, civic education
4	35-55	Male	Founder and director of a social enterprise and an NGO	Refugees integration, social and labour inclusion
5	25-35	Female	Activist and project manager	Rewilding, nature conservation

Focus Group 1	Age group	Gender	Role/profession	Field of work
1	25-35	Male	Activist and trainer	Inclusion through cultural activities, social farm
2	35-55	Female	Activist and volunteer	Digital education and participative processes
3	35-55	Male	Activist and trainer	Responsible tourism, anti-mafia movement
4	55-65	Male	Project manager	Environmental education
5	25-35	Male	Project manager and activist	Social inclusion, environmental education

Focus Group 2	Age group	Gender	Role/profession	Field of work
1	25-35	Female	Project manager and activist	Rescuing migrants, human rights advocate
2	35-55	Female	Activist, volunteer	Rescuing migrants, human rights advocate
3	35-55	Male	Journalist, trainer	Digital education
4	25-35	Male	Activist and Project manager	Urban regeneration and environmental education
5	18-25	Male	Activist, volunteer	Participatory education practices
6	25-35	Male	Project manager	Digital education

