

European Union 2025

Human rights defenders and civil society space

Civil society organisations and human rights defenders play a vital role in a healthy system of checks and balances, as underlined in the [Council Conclusions](#). NHRIs are human rights defenders, and they also have the mandate to promote and protect other human rights defenders. Each year, numerous reports by relevant stakeholders, including civil society organisations and NHRIs, point to the continuously shrinking space for civil society actors to operate. This year's ENNHRI report prioritises this topic to provide relevant information on the current challenges affecting the enabling space for civil society. In light of the upcoming EU Civil Society Strategy, there is a momentum to identify the most pressing issues in this area and recommend appropriate and firm responses from the European Commission and EU Member States to counter the deterioration of the environment for the functioning of civil society organisations and human rights defenders.

Laws, measures and practices negatively impacting civil society and human rights defenders

Reports from EU ENNHRI members confirmed the worrying trend of further shrinking space in which civil society organisations (CSOs) and human rights defenders (HRDs) function. ENNHRI members identified numerous laws and measures negatively impacting CSOs and HRDs across the EU.

NHRIs from eight EU Member States raised serious concerns about laws and measures affecting the full realisation of **freedom of peaceful assembly**. The NHRIs from Belgium, Finland, Luxembourg and the Netherlands reported on ongoing legislative proposals or adopted legislative amendments limiting freedom of assembly. In Poland, some assemblies were banned by invoking emergency laws, and in the Netherlands, assemblies were banned by emergency ordinances issued by local authorities that raise concerns over their proportionality. In Slovakia, limitations on freedom of assembly were introduced in the name of national security, while in Sweden such measures are proposed in a draft law. NHRIs from Belgium, France, Germany and Poland identified disproportionate use of force and measures by law enforcement during assemblies. In Belgium and Germany, the assemblies in support of Palestine were particularly targeted by authorities.

Ten EU NHRIs identified cases of **intimidation, harassment or violence against protesters before, during or after protests**. For example, this was a case in Sweden, while, in particular, in Croatia, Finland, France, Poland and Slovenia, NHRIs reported that excessive use of force was used against

protesters by law enforcement, while in Croatia – also by private security companies. In the Netherlands, the NHRI reported on allegations of violence, which are under investigation. Sometimes, certain groups were specifically targeted: environmental defenders in Croatia, Finland, Germany, France; and LGBTQ+ activists and individuals in Lithuania and Slovakia. In certain countries, NHRIs also raise concerns over the use of surveillance technologies by state authorities during protests, such as in France and the Netherlands.

At the same time, NHRIs also disclosed worrying examples of limitations put on **freedom of expression** in Belgium, Croatia, Denmark, Germany, Luxembourg, the Netherlands, Slovakia, and Poland. In the Netherlands, the NHRI reported on the proposals for such measures impacting freedom of expression, especially in the context of the right to peaceful protests. In Denmark, Danish law does not provide for sufficient protection of public servants in relation to them exercising freedom of speech. The reports also revealed challenges in ensuring the balance of rights: while in Belgium hate speech to some extent remains unpunished, in Germany, the measures introduced to address online disinformation and hate speech might lead to unlawful content removal and a precarious lack of transparency.

In almost half of the EU countries, ENNHRI members recognised worrying limitations on **freedom of association**. In some countries, the obstacles concerned burdening bureaucracy (Romania) or difficulties in access to relevant documents (Luxembourg, Poland), which impact the activities of CSOs. In other countries, NHRIs identified attempts to hinder the functioning of CSOs. This was a particular case in France, where the grounds for dissolution of associations were broadened by a law, in Slovakia, where the attempts to introduce a ‘foreign agent’ law were undertaken, in Greece, where the excessive registration requirements for CSOs persist, and in the Netherlands, where new measures affecting the representation of associations have been envisaged. In several countries, such as Belgium, Croatia and Slovakia, NHRIs observed **harassment in the form of excessive administrative controls and audits**.

NHRIs also emphasized that the attempts to criminalise the activities of organisations addressing climate change (in Germany) and label organisations by categorising them as ‘terrorist’ organisations (in Belgium). In this vein, it is worth noting that the overall trend of **criminalisation of work of human rights defenders** was identified by NHRIs in Belgium, Croatia, Germany and Slovakia.

In half of the EU Member States, ENNHRI members stressed that civil society organisations and human rights defenders face **serious obstacles in access to funding**. These challenges concern, for instance, a lack of sufficient funding (in the Czech Republic, Poland and Romania) or reductions in available public funding (in Croatia, Finland, France, Germany, Ireland and Sweden). In Finland,

the radical cuts in the funding of CSOs took place in the context of austerity measures put in place. In Slovakia, there were attempts to limit CSOs' access to foreign funding, while in the Netherlands, the law has been under drafting process and potentially would limit access to funding of civil society. In Belgium, Croatia and Estonia, the obstacles in the availability of funding reported were of an administrative nature; in Belgium due to a requirement for CSOs to apply for funding every 5 years, in Croatia due to late payments to CSOs, and in Estonia due to financial gaps caused by delays in public calls.

In many EU countries, NHRIs also reported on **shortcomings in access to information and law- and policymaking processes** for civil society. The shortcomings in ensuring meaningful public consultations were particularly identified in Croatia, Estonia, Finland, Lithuania, Luxembourg, the Netherlands, Poland, Romania, Slovakia, and Sweden. For instance, in Estonia, Finland and Romania, ENNHRI members noted short deadlines for public consultations, while the NHRIs from Croatia and Lithuania emphasised the lack of due consideration of the proposals provided by CSOs. The NHRIs from Luxembourg, Slovakia and Sweden revealed an overall reluctance of state authorities to engage with CSOs within consultation processes.

Similarly, in numerous EU Member States, NHRIs identified obstacles in access to information by CSOs, as evidenced in Belgium, Croatia, Estonia, Finland, Luxembourg, Poland, and Slovakia. These could be caused by a new potentially arbitrary notion of „extensively excessive” search for information carrying a fee (in Slovakia), refusal of access to certain premises (in Croatia and Poland), and long and complex procedures required to access official documents and difficulties in challenging refusals (in Belgium).

The shrinking space for civil society organisations and human rights defenders has been made worse by the **growing negative attitudes, orchestrated campaigns and stigmatisation** of these actors by state authorities and the wider public. This was particularly the case in numerous EU Member States – such as Belgium, Croatia, Finland, Germany, Lithuania, the Netherlands, Slovakia, Slovenia and Sweden. For instance, in Slovakia and Sweden, orchestrated smear campaigns and/or threats against civil society actors were detected, in Slovenia, the negative attitudes towards CSOs were also coming from public actors, while in Germany the pressure on these actors was perpetuated by the rise of right-wing extremism and polarisation of society. Furthermore, NHRIs from Croatia, France, Germany and Slovakia raised concerns over a growing climate of **repression against environmental defenders**, while in Finland they faced negative attitudes.

NHRIs from several EU countries voiced their concerns over **attacks on CSOs and HRDs** and their work, namely in Belgium, Croatia, Germany, Lithuania, Slovakia, Slovenia and Sweden. CSOs and HRDs also faced **threats and harassment** both online and offline. Such instances were identified in

Belgium, Croatia, Finland, Germany, Lithuania, Slovakia, Slovenia and Sweden. Women HRDs were more likely to face threats, for instance, in Belgium, Croatia, France, Slovenia and Sweden. In Belgium, Croatia and Slovakia, organisations and defenders protecting LGBTQ+ rights were a particular target of attacks.

Several NHRIs evidenced **transnational repression of human rights defenders**. For example, the French and Luxembourgish NHRIs confirmed that foreign HRDs were affected by actions carried out by enterprises originating from their respective countries. In Belgium and France, national HRDs were victims of foreign attacks. In Lithuania, such an attack was carried out against an HRD with the citizenship of a third country. In Belgium, HRDs were targeted with **strategic lawsuits against public participation (SLAPPs)** in foreign jurisdictions. Overall, the worrying number of SLAPP actions was identified by NHRIs from Croatia, France, Germany, Poland, Slovakia, Slovenia and Spain.

Protection of human rights defenders

Reporting by ENNHRI members revealed important gaps in the protection of HRDs in EU Member States. Specific national protection mechanisms for civil society and HRDs were identified in one EU country only, namely Spain. On the other hand, in Finland, France and Germany, the governmental support was offered only to HRDs from abroad, while in the Netherlands and Sweden, such a support mechanism is provided by CSOs.

The information provided by ENNHRI members confirms the insufficiency in the national measures protecting HRDs across the European Union. ENNHRI has continuously [advocated](#) for the establishment of both national and regional mechanisms for the protection of HRDs in the EU, including through strengthening the role of NHRIs to protect HRDs at the national level. In this vein, ENNHRI welcomes the European Commission's decision to develop an EU Strategy to support, protect and empower civil society and invites the European Commission to recognise therein the need to ensure protection mechanisms for HRDs and the specific role NHRIs play, as the next section will elaborate.

Activities of NHRIs to support civil society space and human rights defenders

In line with the UN Paris Principles, NHRIs are pluralistic institutions, reflective of various strands of civil society in a country, and function as bridge-builders between state authorities and civil society. NHRIs do so through close engagement with civil society organisations (CSOs) and human rights defenders (HRDs) when carrying out their mandate. This has also been confirmed in their 2025 reporting.

The significant majority of ENNHRI members from EU Member States carry out **monitoring** of the situation of CSOs and HRDs and issue **recommendations and opinions** to address the challenges impacting enabling space for civil society, prompting appropriate actions from relevant authorities. For example, NHRIs in Croatia, the Netherlands and Sweden, included a dedicated focus on CSOs and HRDs in their annual reports. Some NHRIs carried out targeted research on the situation of HRDs in their countries; the NHRI from Belgium (FIRM-IFDH) published a dedicated report on the challenges faced by national HRDs, while the Swedish NHRI was undertaking preparations for a dedicated survey on the situation of HRDs. The NHRI from Portugal included civil society actors' perspectives in its human rights studies, and the Croatian NHRI reported on the situation of civil society to the Parliament.

Some NHRIs confirmed that they were providing **specific support to or receiving advice from women human rights defenders and LGBTQ+ human rights defenders**. For instance, in Estonia and Sweden, the NHRIs included them in their Advisory bodies, and in Croatia, they were a part of the NHRI's thematic network. The NHRIs from Lithuania, Ireland and Slovakia supported activities to advance LGBTQ+ rights, while the Belgian human rights institutions closely collaborate with and support LGBTQ+ organisations.

The substantial majority of EU ENNHRI members also carry out **capacity-building** activities to strengthen civil society actors and their activities in the protection of human rights – these include dedicated trainings and workshops, as well as information campaigns. Around half of the EU ENNHRI members have the competence to address **complaints** submitted by individuals, and they do so also in the matters signalled or faced by CSOs and HRDs. Several NHRIs, including those from Belgium (Unia), Denmark, Poland and Spain, provided **legal assistance** as well. Several NHRIs provide dedicated support to civil society actors through their **specific mandates** – for instance, NHRIs in Belgium (FIRM-IFDH), Croatia, Hungary, and Poland are responsible authorities for the protection of whistleblowers who report on breaches of EU law. NHRIs from Latvia, Portugal and Spain use their NPM mandate, and the Estonian NHRI uses its mandate as monitoring body under UN Convention on the Rights of Persons with Disabilities (CRPD).

NHRIs from EU Member States are also committed to promoting the activities of CSOs and HRDs and their enabling space, which is illustrated by **joint meetings and roundtables** organised by ENNHRI members in the majority of EU countries. Some ENNHRI members carried out **promotion campaigns and awareness-raising activities** (in particular in Belgium (FIRM-IFDH), Ireland, the Netherlands, Romania, Spain, Slovenia and Sweden). Lastly, some NHRIs are involved in awarding prizes to CSOs and HRDs in recognition of their efforts to promote and protect human rights – this is the case in Belgium (Unia), Denmark, France, Hungary, Poland, and Spain.

Furthermore, NHRIs also support the enabling space and address challenges faced by CSOs and HRDs through **engagement with relevant international and regional mechanisms**. This includes contributions to UN processes in support of CSOs and HRDs, carried out by NHRIs from Croatia, Denmark, France, Greece, Hungary, Slovakia, and Spain, or involvement with OSCE ODIHR, such as in the case of NHRIs from Estonia, Slovakia and Spain. ENNHRI members from EU Member States closely engage with EU actors on the protection of civic space, and the present report and its recommendations are an example of this engagement. In the same vein, ENNHRI also reports on this topic to the UN and the Council of Europe.

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