



Civil Society & Think Tank Forum Prishtina 2026

Policy Recommendations

Civic Space and Democratization

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1 Introduction

The protection of civic space should be a binding condition in the enlargement process.

Context:

Civic space across the Western Balkans is narrowing on multiple fronts. Restrictive laws on civil society organizations, SLAPPs, surveillance, and hostile narratives are increasingly common, widening the gap between EU accession commitments and the reality faced by journalists and civil society actors on the ground.

Meanwhile, opportunities for meaningful civil society participation in policymaking are also diminishing. Public consultations are treated as mere formalities, while organizations face growing barriers to engaging in legislative drafting and reform monitoring.

This shrinkage intersects with democratic backsliding, electoral challenges, and widespread disinformation, adding pressure on independent media already struggling with market concentration and unstable funding. Recent significant civic mobilisation has tested governments' commitment to peaceful assembly and fundamental freedoms.

These trends directly impact EU accession. Through initiatives like the European Democracy Shield, the EU Strategy for Civil Society, and the upcoming Multiannual Financial Framework (MFF) 2028–2034, the EU is strengthening its commitment to civil society participation, protection, and funding. Western Balkan countries are increasingly being linked to these frameworks. However, it remains unclear how these measures will translate into practice. With European priorities shifting toward competitiveness and security, there is a real risk that civic space commitments will remain merely symbolic unless backed by concrete safeguards.

2

Progress Check & Key Challenges

Progress on previous recommendations

As the thematic group on Civic Space & Democratization was established only in 2026, this assessment draws on previous CSF recommendations relevant to its focus areas.

The EU enlargement agenda places increasing emphasis on democratic resilience, prioritizing reforms in the rule of law, civic participation, media freedom, and accountability.

While Western Balkan countries have adopted strategies and legislation in the context of the EU accession process, implementation remains uneven, with limited follow-through. At the same time, a hostile regulatory environment, politically influenced funding, and the increasing use of SLAPPs and other forms of intimidation against civil society and the media remain largely unaddressed. Furthermore, electoral reforms have yet to resolve concerns over political influence, while responses to disinformation remain fragmented. Consequently, previous CSF recommendations, including on participatory policymaking, transparency, and the effective protection of civic space, remain essential to addressing the persistent gap between formal commitments and actual practice across the region.

Key challenges and current context:

- Specific legal and administrative hurdles increasingly target civil society, including mandatory registration for foreign-funded organizations, “foreign agent” labelling, and disproportionate anti-money laundering scrutiny.
- Consultation processes are frequently sidestepped, either entirely for laws proposed by Members of Parliament or rushed through accelerated procedures justified by EU integration requirements, leaving civil society insufficient time for meaningful input. This also affects minorities, youth, women, persons with disabilities, and other marginalized or underrepresented groups.
- Coordinated anti-gender movements actively target women’s rights and LGBTIQ+ organizations across WB6, compounding existing discrimination.
- Election observation missions continue to identify the same structural weaknesses: misuse of public resources for campaigning, pressure on public employees, inadequate enforcement of

campaign finance rules, blurred boundaries between the ruling party and the state, and election fraud. Despite repeated international recommendations to depoliticize the election administration, these patterns persist. Further challenges concern the security, transparency, and independent oversight of technologies used for voter identification, voting and vote counting, as well as barriers to accessible voting for people with disabilities. Social media-driven disinformation and manipulation further undermine the electoral information environment, including through coordinated amplification of attack advertisements targeting political opponents, while AI-generated content facilitates the production and dissemination of manipulative campaign material.

- Finally, civil society's role in the Reform and Growth Facility remains largely consultative, with uneven influence over decision making. This underscores the need for meaningful CSO inclusion in Reform and Growth Facility Monitoring Committees and the extension of EU democracy support mechanisms.

3 Recommendations

Recommendation 1: Institutionalize meaningful, inclusive and accessible civil society participation and transparency in policy-making processes.

Addressed to: Western Balkans governments, European Commission

Context: Civil society participation throughout the policymaking process and across the full policy cycle remains limited, particularly for organisations representing marginalised groups. Restricted access to early-stage legislative processes and decision-making spaces constrain opportunities for meaningful consultation and limits the ability of CSOs to contribute effectively to the implementation, monitoring, and the advancement of EU integration reforms.

Ask: WB governments should guarantee timely, meaningful, inclusive, and accessible civil society participation throughout the policy making cycle by effectively implementing mechanisms that enable CSO engagement from the initial stages of policy and legislative drafting, particularly for those representing marginalised groups.

WB governments should ensure that exemptions from public consultation requirements, particularly for legislation proposed by MPs or processed under accelerated procedures, are strictly limited to clearly defined and duly justified exceptional circumstances. Such exemptions should be transparently disclosed, with safeguards to prevent their routine use from undermining meaningful civil society participation.

WB governments should ensure that public authorities provide timely, reasoned, and standardised written feedback to civil society contributions. Such feedback should explain how the contributions were considered, and whether and to what extent were they incorporated into the final policies or legal acts.

EU institutions should ensure EU oversight mechanisms assess governments' compliance with commitments to meaningful, inclusive and accessible consultation throughout the integration process, preventing the use of EU-related obligations or legislative urgency as justification for circumventing consultation requirements. Evidence and findings generated through CSO research and monitoring should be systematically incorporated into annual assessments, Berlin Process reporting, and other relevant enlargement monitoring.

Recommendation 2: Guarantee a safe, and enabling legal, institutional, and financial environment for independent media and human rights defenders

Addressed to: WB6 governments, European Commission

Context: Media professionals, human rights defenders (HRDs), and activists across the Western Balkans face political and financial pressure, SLAPPs, harassment, surveillance, and restrictions on peaceful protest. Media concentration, opaque public funding, limited access to information, and weak oversight, undermine media independence and information integrity, limiting the public's access to accurate and reliable information. Weak enforcement of existing protections leaves journalists and civic actors vulnerable to threats and retaliation.

Ask: WB governments should strengthen the protection of journalists, HRDs, and civic actors by fully transposing the EU Anti-SLAPP Directive and implementing relevant Council of Europe standards. They should protect media independence and information integrity through transparent media ownership and public funding, measures to prevent market concentration and political

interference, and respect for journalists' professional rights, ethical standards, and access to information.

WB governments should respond proactively to protection requests from journalists, HRDs, and activists; prevent unlawful surveillance; and safeguard peaceful protest and legitimate expression. They should establish mechanisms to identify and monitor recurring patterns of threats and ensure that competent authorities promptly and effectively investigate and, where appropriate, prosecute and sanction attacks, intimidation, unlawful harassment, and other forms of retaliation.

The European Commission should establish measurable indicators for HRD safety, journalist protection, and media independence, systematically monitoring these metrics as a binding component of the EU integration process to ensure findings directly shape annual country reports.

Recommendation 3: Strengthen rule of law and safeguards for electoral integrity

Addressed to: Western Balkan governments

Context: While procedural electoral reforms are underway, they have yet to address underlying structural problems. Persistent concerns include the misuse of public resources, incumbent advantage, politicized electoral management bodies, pressures on voters, and a lack of effective accountability for electoral violations, all of which undermine electoral integrity. Further challenges relate to the security, transparency, and independent oversight of technologies used for voter identification, voting and vote counting, as well as barriers to participation for people with disabilities. More recently, AI-generated content and coordinated disinformation on social media can distort the electoral information environment and influence public debate.

Ask: WB governments should prioritise election reforms focused on the operational and financial independence of electoral management bodies through transparent, merit-based, non-partisan appointment procedures, insulating them from ruling-party quotas and political interference.

They should ensure that technologies used for voter identification, voting, and vote counting are secure, transparent, independently audited, and effectively supervised, while guaranteeing accessible alternative voting for people with disabilities.

WB governments should ensure full transparency of political and electoral campaign financing, including the disclosure of funding sources, donors, third-party support and expenditures. They should ensure effective oversight mechanisms of campaign financing to detect and prevent unlawful or undisclosed foreign funding and safeguard electoral processes against foreign interference.

WB governments should address AI-enabled and social media-driven disinformation and manipulation through proportionate measures that respect freedom of expression. They should introduce and enforce strict bans on the use of public funds and state apparatus for campaign purposes, strengthen oversight of institutional communication and political activities outside official campaign periods, and enable independent domestic observers to operate freely and safely throughout the electoral cycle. Finally, governments should ensure effective and timely judicial mechanisms for the resolution of electoral disputes, alongside prompt investigation and adjudication of cases involving voter coercion, vote-buying, and electoral fraud.

Recommendation 4: Ensure dedicated and safeguarded EU funding for protection of civic space in the Western Balkans

Addressed to: European Commission, European Parliament and EU Member States

Context: The EU Strategy for Civil Society, the European Democracy Shield, and preparations for the MFF 2028–2034 recognise civil society as a key partner in strengthening democracy and the rule of law. Future EU funding should reflect this role by providing predictable and sustainable support for CSOs and ensuring that civil society funding remains responsive to its specific needs and operating environment, rather than extending government-focused conditionality frameworks, such as those applied under the Reform and Growth Facility.

Ask: The European Commission, European Parliament, and EU Member States should ensure that the MFF 2028–2034 includes a clear and transparent enlargement envelope with dedicated civil society allocations under the Global Europe instrument.

Funding modalities should support the long-term sustainability of civil society, ensuring that funding is accessible to smaller, grassroots and watchdog organisations, including through flexible, multi-year core or institutional support rather than predominantly short-term project-based funding. Dedicated civil society funding under the Growth Plan should be safeguarded, protected from

undue government interference, and not subject to reallocation or absorption during implementation.

Recommendation 5: Ensure active and rights-based participation of the Western Balkans in the European Democracy Shield

Addressed to: Western Balkan governments, European Commission and Member States

Context: The European Centre for Democratic Resilience provides for cooperation with EU candidate countries and potential candidates. Clear participation arrangements are needed to ensure that all six Western Balkan partners can contribute to its work and benefit from its expertise.

Ask: WB governments should commit to the European Democracy Shield, seek inclusion in its structures and make full use of its instruments, cooperation mechanisms and expert networks. They should jointly develop a regional election and digital resilience framework covering political advertising transparency, campaign finance reporting, cyber incident protocols for election bodies, cooperation with fact-checkers and platforms, youth media and AI literacy, and responses to AI-generated manipulation. Finally, they should formally request EU assistance against foreign malign influence in elections, and adopt safeguards so that foreign interference, transparency, lobbying and anti-disinformation tools cannot be turned against civil society, media, academia, trade unions, watchdogs or civic movements.

The European Commission and Member States should support independent monitoring of the EDS in the region, led jointly by civil society, fact-checkers, academia, media, regulators and public institutions. Political, financial and technical support should be tied to measurable, independently verified progress on democracy and the rule of law, including election integrity, functioning institutions and civic space, and redirect support to independent civil society where democracy backslides.

BERLIN PROCESS SUMMIT ASK: Strengthen civil society engagement, resilience, and regional coordination to enhance accountability in the Berlin Process

Context: Civil society organisations and think tanks contribute to the accountability and effectiveness of the Berlin Process by monitoring commitments, providing evidence-based recommendations, and representing citizens' perspectives. However, their impact remains limited by fragmented monitoring mechanisms, insufficient institutionalised participation, and shrinking civic space.

Ask: The Berlin process should establish a structured monitoring mechanism to produce a public delivery tracker detailing commitments made, progress achieved, and outstanding obligations, designed and implemented in partnership with civil society actors.

The Berlin Process should ensure that existing pledges and commitments are fully implemented before new ones are undertaken.

Finally, parties should commit to the full participation of all six Western Balkan partners in the European Democracy Shield and endorse a dedicated "Western Balkans and the European Democracy Shield" implementation annex to the Leaders' Declaration.