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Civic Space Report
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# Civic Space Report Ukraine

## 4liberty.eu Civic Space Report 2025/2026

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# Ukraine

Country Score: **Mostly Enabling**

Country Trend: ↔

# 3.15



**Cluster A: 3.00**
A1 Equal treatment: 3
A2 Political recognition as partners: 4
A3 Refrained authorities from smearing: 3
A4 No weaponization of state powers: 3
A5 Transparent and open public institutions: 2



**Cluster B: 3.20**
B1 Free establishment and operation: 4
B2 CSOs enjoy a safe space: 3
B3 Liberty of resourcing: 3
B4 Enabling fiscal environment: 3
B5 Free expression of criticism: 3



**Cluster C: 3.60**
C1 Citizens trust: 4
C2 Present in media: 3
C3 Free engagement: 4
C4 CSOs embedded in communities: 4
C5 Freedom of assembly: 3



**Cluster D: 2.80**
D1 Decision-making participation: 3
D2 Timely consultations: 2
D3 Policies for cooperation: 3
D4 Free advocacy: 3
D5 Government listens: 3

# Civic Space Report – Ukraine

## Introduction

Since Russia's full-scale invasion in February 2022, Ukraine has been governed under martial law, which has been repeatedly extended and remained in force throughout the assessment period (January 2025 – June 2026). Martial law permits restrictions on certain rights, including freedom of assembly, and has led to the postponement of national elections, while the war continues to cause large-scale displacement, emigration and destruction. At the same time, Ukraine has pursued an ambitious reform agenda anchored in its EU candidacy: accession negotiations formally opened in 2024, and in June 2026 the first negotiating cluster, "Fundamentals", was opened, placing democratic institutions, the rule of law and fundamental rights at the center of the process.

Against this background, Ukrainian civil society combines a long tradition of civic mobilization—from the Orange Revolution of 2004 and the Revolution of Dignity of 2013–2014 to the volunteer movement that emerged in response to Russian aggression—with a growing professional sector of think tanks, watchdogs, human-rights groups and service providers. The period assessed was shaped in particular by the continuing demands of the war on civil society's people and resources; by the 2025 suspension of major U.S. assistance, which tested the sector's funding model; and by the July 2025 anti-corruption protests, which showed that civic mobilization retained real political influence under wartime conditions. This report assesses Ukraine's civic space against the project's twenty standards across four clusters.



# Cluster A – Institutional and Political Environment and Narratives of CSOs

## A1 – Equal treatment

***Standard.*** *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

Formally, the state provides a broadly non-discriminatory framework for CSOs. Public associations and charitable organizations may be established and operate without political loyalty tests, and there were no documented patterns in 2025–June 2026 of restricting organizations simply because they criticized officials or policy. CSO Meter also found no known practice of government institutions systematically giving preferential treatment to organizations. Foreign-founded organizations face additional documentation and verification, but the legal grounds for registration and dissolution are generally the same. The more important inequality is functional rather than ideological: CSOs are often treated less favorably than businesses in access to rapid digital registration, banking services, and some public-procurement procedures (ECNL & ISAR Ednannia, 2026).

The period nevertheless produced two opposite tendencies. On the positive side, automatic online registration for public organizations using a model charter became available through Diia in April 2026, narrowing a long-standing gap between CSOs and businesses (Ministry of Digital

Transformation, 2026). On the negative side, smaller and relocated organizations, especially those linked to temporarily occupied territories, continued to face heavier banking verification, account restrictions, and compliance burdens. At the local level, research also documents "pocket" or authority-affiliated CSOs created to attract donor resources, which can imitate pluralism and crowd out independent initiatives even when their creation is driven by pragmatic local needs. Equal treatment is therefore broadly respected, but not fully achieved in practice (ISAR Ednannia, 2025).

**Trend. Stable** – equal treatment held broadly steady, as the April 2026 Diia registration reform narrowed the gap between CSOs and businesses while banking and verification burdens on smaller and relocated organizations persisted.

**Score 3:** The framework is broadly non-discriminatory, but equal treatment is not fully achieved in practice, as banking burdens and "pocket" CSOs create functional inequalities.

### A2 – Political recognition as partners

> ***Standard.*** *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

Ukrainian public authorities generally recognize civil society as a legitimate actor, and CSOs have become indispensable partners in areas ranging from humanitarian response and social services to anti-corruption, recovery, public administration and EU accession. The state's practical dependence on civil society expertise is unusually high. Think tanks draft policy options, conduct regulatory and economic analysis, prepare shadow reports and monitor reforms; service-delivery organizations support groups that the state cannot always reach effectively. In the 2025 sector survey, 46% of CSOs received partnership invitations from government

institutions, while 48% rated cooperation positively at the local level, 41% with regional/district administrations, and 28% with central authorities (ISAR Ednannia, 2025).

The practical quality of this partnership varies. CSO Meter found that access to parliament, government, and the Presidential Office remained insufficiently open, while EU-accession working groups sometimes operated through fragmented or formal consultation rather than co-creation. These shortcomings, however, concern the timing, access and feedback of participation, which are assessed under D1, D2 and D5, rather than the political recognition of CSOs as legitimate partners. On recognition itself, the evidence is consistent: the EU accession process reinforced the partnership model in 2026, as rule-of-law events and EU-funded programs explicitly brought together state institutions, experts and civil society, reflecting official recognition of CSOs as contributors to implementation and monitoring (EEAS, 2026a; EEAS, 2026b). Political recognition of CSOs as partners is therefore assessed as Enabling.

**Trend.** Stable – official recognition of CSOs as partners was maintained throughout the period and reinforced in 2026 by the EU accession process.

**Score 4:** Public authorities consistently recognize CSOs as legitimate and indispensable partners, a role reinforced by the EU accession process.

### A3 – Authorities refrain from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

The assessment period did not show a systematic state-sponsored narrative portraying independent CSOs as "foreign agents", enemies, or illegitimate foreign proxies. International funding is legally accepted and remains a normal part of the sector's operating model. CSO Meter reported

that organizations receiving foreign grants were not generally stigmatized by government or state-supported media, and older draft initiatives that could have created “foreign influence” restrictions were not enacted. This distinguishes Ukraine from several regional cases where delegitimizing rhetoric has preceded formal civic-space restrictions (ECNL & ISAR Ednannia, 2026).

This does not mean the information environment is benign. Ukrainian civil society operates amid intense Russian disinformation and hybrid attacks, while individual activists, journalists and organizations may be targeted by online harassment or polarising domestic narratives. The state’s own rhetoric is usually supportive of volunteering and civil society, particularly where organizations contribute to defense and recovery. The principal risk is therefore not a consolidated official smear strategy but episodic political hostility toward watchdog or critical actors, especially around contentious anti-corruption and governance issues. The lack of an institutionalized “foreign agent” frame, combined with continued official and EU-supported cooperation with independent CSOs, supports a Mostly Enabling score, while the wartime information environment and isolated attacks argue against the highest rating.

**Trend.** Stable – no official smear or “foreign agent” narrative emerged during the period, although episodic hostility toward watchdog actors persisted within a hostile wartime information environment.

**Score 3:** There is no institutionalized “foreign agent” frame or official smear strategy, but the wartime information environment and isolated attacks prevent the highest rating.

## A4 – No weaponization of state powers and good governance principles

> ***Standard.*** *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, emergency measures, or principles such as transparency and fiscal due diligence — selectively or disproportionately to pressure CSOs because of their activities or views.*

There is no evidence of systematic use of tax inspections, audits, law enforcement or emergency powers to suppress CSOs because of their views. Registration and reporting rules are generally defined by law, and forced dissolution remains rare and subject to court decisions. The organizations prohibited in 2025 were linked by courts to threats to national security, sovereignty or territorial integrity in the context of Russia's aggression; available evidence does not show a generalized mechanism for silencing independent civic actors (ECNL & ISAR Ednannia, 2026).

However, "good governance" tools can create disproportionate burdens. AML/CFT and ultimate beneficial owner requirements remain poorly adapted to non-profit governance. Banks have requested grant agreements, founders' residence information, and additional proof related to occupied territories, sometimes delaying transactions or access to accounts. The 2025 national risk-assessment discourse also raised concern that generic indicators could classify ordinary civil-society activity as a higher financial-monitoring risk. The Law on Lobbying likewise raised concerns that advocacy could be confused with commercial lobbying, although the assessment period documented no systematic repression through that framework. The issue is therefore one of structural risk and administrative overreach rather than established political weaponization.

**Trend.** Stable, with risk – no political weaponization of state powers was documented, but AML/CFT, UBO and lobbying rules remained a latent source of disproportionate burden.

**Score 3:** State powers are not systematically used against CSOs, but AML/CFT, UBO and lobbying rules create a structural risk of disproportionate administrative burden.

### A5 – Transparent and open public institutions

> ***Standard.*** *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

Access to information and institutional openness remain among the weakest dimensions of Ukraine's civic environment. Martial law has legitimate security consequences, but it has also normalized reduced transparency. CSO Meter identified insufficient openness in parliament, government, and the Presidential Office; difficulties accessing parliamentary committee work; uneven local transparency; and cases where public consultations were not conducted even when formally required. Parliament resumed broadcasting plenary sessions in 2025, and legislation strengthened obligations to broadcast local council meetings, but implementation remained incomplete (ECNL & ISAR Ednannia, 2026).

The material effect is significant because Ukrainian CSOs increasingly perform watchdog, public-spending, and EU-accession monitoring functions. Restricted or delayed access to data directly reduces their ability to scrutinize decisions and evaluate implementation. Civil society has repeatedly advocated restoration of open data and more transparent decision-making, while the 2025–2026 National Strategy action plan includes measures to improve participation and dialogue. By April 2026, the government was publishing implementation information on

this plan, which is positive. Nevertheless, the dominant pattern during the assessment period remained a gap between formal transparency commitments and practical access, especially for early-stage decision-making. The trend is mixed rather than clearly deteriorating: some parliamentary and digital openness was restored, but wartime opacity remains structurally important (Cabinet of Ministers of Ukraine, 2025; 2026).

**Trend.** Mixed – the resumption of parliamentary broadcasting and published strategy-implementation data were offset by persistent wartime opacity, especially in early-stage decision-making.

**Score 2:** Martial law has normalized reduced transparency, leaving a persistent gap between formal transparency commitments and practical access to information.



## Cluster B – Legal and Financial Framework for CSOs

### B1 – Free establishment and operation

***Standard.*** *Everyone can freely establish, join, or participate in a CSO; CSOs determine their own objectives; registration is clear, simple, quick, and inexpensive. The state does not interfere in internal governance, and monitoring or reporting is defined by law, proportionate and not onerous*

Freedom of association is strongly protected in law and, despite wartime disruption, generally respected in practice. Public organizations may operate with or without legal personality; charitable organizations operate as legal entities. State registration is free, objectives and geographic scope can be determined independently, and there are no general territorial restrictions on lawful CSO activity. Reporting is relatively standardized and may be completed online. In 2025, CSO Meter rated freedom of association as the strongest area of Ukraine's enabling environment, with few practical obstacles to creation, membership, or participation (ECNL & ISAR Ednannia, 2026).

The trend improved further in the first half of 2026. Following experimentation with a model charter, Ukraine launched automated registration of public organizations through the Diia portal on 21 April 2026. The service allows eligible founders to complete an online application and register a new organization without direct interaction with a state registrar; inclusion in the non-profit register can also be requested in the same process (Ministry of Digital Transformation, 2026; State Tax Service of Ukraine, 2026). Some limitations remain—such as the model-charter format and separate treatment for foreign founders—but the reform materially reduces time, paperwork, and the role of discretionary administrative practice. Against the project standard, establishment and ordinary operation are therefore assessed as Enabling.

**Trend.** Improving – the April 2026 launch of automated registration through Diia further simplified the establishment of public organizations.

**Score 4:** Freedom of association is strongly protected, and automated registration through Diia makes establishment simple, quick and free.

## B2 – CSOs enjoy a safe space and protection from arbitrariness

***Standard.*** *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

Ukrainian law protects CSOs from arbitrary suspension or dissolution and provides judicial review. Forced termination is exceptional and requires legal grounds. In the period assessed, court prohibitions were primarily justified by national-security concerns arising from Russian aggression and alleged threats to sovereignty or territorial integrity. There was no broader pattern of dissolving ordinary independent organizations for critical advocacy. Nor were there documented mass sanctions against CSOs for participation in lawful policymaking or public debate (ECNL & ISAR Ednannia, 2026).

The principal safety problem is the war itself. Civil society staff, volunteers, humanitarian workers, journalists and activists face Russian attacks, occupation-related threats, cyberattacks and the risks of working in frontline or de-occupied territories. Some CSO representatives serve in the Armed Forces, and organizations have lost staff to both military service and Russian strikes. Protection by Ukrainian institutions is not always fully effective, particularly in relation to threats against journalists, activists and certain public events. Freedom House and Ukrainian monitoring organizations continued to document intimidation and pressure affecting media and civic actors in 2026. Thus, the domestic legal framework is protective, but the lived environment cannot be described as fully safe. The score reflects the distinction between the absence of systematic state arbitrariness and the severe physical and institutional risks of wartime.

**Trend.** Stable – legal protection against arbitrary suspension or dissolution remained intact, while war-related physical and security risks continued unabated.

**Score 3:** The legal framework protects CSOs against arbitrary dissolution, but the war makes the lived environment far from fully safe.

## B3 – Liberality of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

CSOs are legally free to seek, receive, and use domestic and foreign resources. There is no general "foreign funding" prohibition or special tax penalty for international grants, and electronic donations, crowdfunding, and in-kind support are permitted. This legal openness is crucial because international funding is the backbone of Ukraine's professional civil society. In the 2025 survey, 25.4% of organizations received international grants; 70.9% viewed international grants as the funding source that most needs further development. By contrast, only around 8% reported state or local-budget funding, and public funding is generally project- or sector-specific rather than a broad institutional-financing system (ISAR Ednannia, 2025).

The key weakness is practical sustainability. The 2025 interruption of U.S. assistance acted as a stress test: 22.3% of active CSOs reported negative effects, with affected organizations reducing or suspending projects and 57% unable to replace the lost funding. Domestic donations and membership fees are widespread but declined sharply as a reported source, while 26.7% of surveyed organizations had no sustainable funding and relied solely on volunteer labor. Banking controls also complicate cross-border transfers. EU and member-state support remained substantial—by April 2026 the EU reported more than EUR 200 million committed to Ukrainian CSOs since 2022—but resource freedom should not be confused with resource sustainability (EEAS, 2026c).

**Trend.** Deteriorating financially – the legal freedom to raise resources was unchanged, but the 2025 suspension of U.S. assistance exposed and deepened the sector's funding vulnerability.

**Score 3:** CSOs are legally free to raise domestic and foreign resources, but resource freedom should not be confused with resource sustainability.

## B4 – Enabling fiscal environment

> ***Standard.*** *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures and sanctions regimes are applied to CSOs proportionately and on a risk basis.*

Ukraine provides important baseline tax advantages for non-profit organizations: qualifying CSOs can obtain non-profit status and are exempt from corporate income tax on resources used for statutory purposes. Grants, donations, membership fees and certain economic activity may support non-profit work, and in 2025 VAT exemptions were extended to social-service providers, including CSOs (ECNL & ISAR Ednannia, 2026).

However, non-profit status can be lost for technical violations, and frequent Tax Code amendments reduce predictability. Donor incentives are modest and rarely used, and no percentage-designation mechanism exists. CSOs are not AML/CFT reporting entities, but banks often treat them as high-risk by default. The result is lengthy account opening, repeated information requests and delayed transfers, especially for smaller organizations. There is no evidence of sanctions regimes being applied against CSOs.

In analytical terms, this is Ukraine's central civic-space vulnerability: CSOs are free to set their agendas, but their capacity to sustain those agendas

can become fragile when donor priorities shift. The fiscal environment is therefore assessed as Restrictive Leaning despite favorable non-profit tax status.

**Trend. Stable** – favorable tax treatment was maintained and modestly extended through the 2025 VAT exemption, while donor incentives and banking practices toward CSOs did not change significantly.

**Score 3:** The core fiscal regime is favorable, but fragile non-profit status, weak donor incentives and AML/CFT practices that are only partly risk-based prevent the highest score.

## B5 – Free expression of criticism

> ***Standard.*** *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

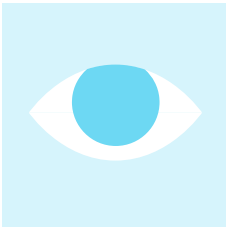
CSOs, activists, experts and journalists continue to criticize authorities publicly and to campaign on contentious issues. The July 2025 anti-corruption protests are the strongest example: demonstrations against legislation affecting NABU (National Anticorruption Bureau of Ukraine) and SAPO (Specialized Anti-Corruption Prosecutor's Office) were widely covered and followed by rapid legislative correction. This shows that strong criticism remains possible. There is no general ban on CSO advocacy or public criticism, and the government does not systematically prosecute organizations for critical positions (ECNL & ISAR Ednannia, 2026).

At the same time, freedom of expression faces pressure from two sources. Externally, Russia is responsible for most threats to media workers: of 26 press-freedom violations documented by the Institute of Mass Information in January 2026, 18 were attributed to Russia, and Russian attacks on media workers continued in June 2026 (IMI, 2026a; IMI, 2026b). Domestically, Freedom House noted continued intimidation of and

institutional pressure on journalists and concerns about the consolidated television news environment, and CSO Meter lowered its 2025 freedom-of-expression assessment (Freedom House, 2026). This domestic pressure is limited in scope, but together with wartime threats it means the information environment is not fully secure or pluralistic.

**Trend. Mixed** – open criticism remained widespread and politically effective, while Russian attacks on media workers and domestic pressure on journalists continued.

**Score 3:** Open criticism remains widespread and politically effective, but Russian attacks and domestic pressure on journalists mean the information environment is not fully secure or pluralistic.



## Cluster C – Public Engagement and Perceptions towards the Work of CSOs

### C1 – Citizens' trust

> ***Standard.*** *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

Public trust is one of the strongest assets of Ukrainian civil society. The full-scale invasion produced an exceptional rise in trust in volunteer organizations and NGOs, and although trust declined from its 2022–2023 peak, it remained high in 2025. Early-2025 survey data synthesized by ISAR Ednannia show trust at about 80% for volunteer organizations

and 61% for NGOs, compared with approximately 47% trust in NGOs before the full-scale invasion. Across several years, volunteer initiatives maintained roughly a twenty-point trust advantage over formal NGOs, but both categories remained considerably more trusted than many political institutions (ISAR Ednannia, 2025).

This trust reflects civil society's direct experience during war: military support, humanitarian aid, social services, local mutual assistance, recovery, and advocacy. It also provides a protective political resource. When formal institutions lose credibility, citizens still tend to view volunteer and civic structures as legitimate channels for collective action. The decline from the wartime peak should not be interpreted as civic delegitimization; rather, it indicates normalization after extraordinary mobilization and increasing public scrutiny of the sector. Given the sustained majority trust in formal CSOs and exceptionally high trust in volunteers, the standard is assessed as Enabling.

**Trend.** Stable at a high level – trust eased from its 2022–2023 peak but remained well above pre-invasion levels, particularly for volunteer organizations.

**Score 4:** Trust remains high—around 80% for volunteer organizations and 61% for NGOs—well above pre-invasion levels.

## C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

CSOs have access to a diverse media environment, especially online, and there is no systematic exclusion of independent civil society voices from public debate. Digital platforms are central to the sector itself: 83.3% of organizations surveyed in 2025 used social networks and messengers

to reach audiences, while research products, expert commentary, and civil-society monitoring frequently appear in independent online media. The anti-corruption protests of 2025 were widely covered across Ukrainian outlets, demonstrating that critical civic mobilization can receive national visibility (ISAR Ednannia, 2025; ECNL & ISAR Ednannia, 2026).

However, media pluralism is constrained by war, financial shocks, and state influence over the consolidated television news format. Independent media also suffered from the 2025 reduction of U.S. funding, and some outlets required emergency support from European sources. Freedom House continued to raise concerns about pressure on journalists and the legal powers available to the media regulator. These constraints matter for CSOs because media access shapes their ability to build constituencies and hold institutions accountable. The environment remains substantially pluralistic, particularly online, but is not fully enabling. The trend is mixed: strong independent digital media coexist with financial fragility, Russian attacks, and unresolved concerns about institutional pressure.

**Trend. Mixed** – pluralistic online media continued to give CSOs visibility, while funding shocks and concerns about the consolidated television news format weighed on the wider media environment.

**Score 3:** The media environment remains substantially pluralistic, particularly online, but is constrained by war, funding shocks and state influence over television news.

## C3 – Free engagement

> ***Standard.*** *Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.*

Ukrainians remain able to volunteer, donate, join civic initiatives, and participate in advocacy on an extraordinary scale. The formal register of

volunteers rose dramatically after 2022, but official numbers capture only a fraction of real participation. In the 2025 CSO survey, 73% of organizations operated entirely through volunteer labor. Volunteer initiatives were also the most common cooperation partners for formal CSOs: about 70% of organizations worked with them at least occasionally. This indicates that civic participation is not confined to professional NGOs but is embedded in wider patterns of social mobilization (ISAR Ednannia, 2025).

There is no general state penalty for volunteering, donating, or joining lawful civic activity. Restrictions arise mainly from martial law, security rules, and the sensitive nature of defense-related activities. Civic participation remains socially valued, and organizations supporting the military, veterans, and war-affected communities remain among the most visible actors in public life. The period also demonstrated that young people could mobilize politically through protest when they regard ordinary consultation channels as ineffective. Although the war creates obvious personal risks and some activities require additional regulation, free civic engagement remains a defining feature of Ukraine and meets the Enabling standard.

**Trend.** Stable at a high level – volunteering, donating and civic mobilization remained widespread and socially valued throughout the period.

**Score 4:** Volunteering, donating and civic mobilization take place on an extraordinary scale and are socially valued, without state penalty.

## C4 – CSOs embedded in communities

> ***Standard.*** *CSOs are embedded in their communities and can mobilize grassroots support, public solidarity, and cross-sector backing in defense of civic space.*

Ukrainian civil society has deep local roots. In the 2025 nationwide survey, 47% of active CSOs described themselves as local organizations, and 21.6%

as regional. Most local organizations reported stable staffing despite wartime pressures, and 63.8% of respondents considered their impact in their own communities significant—up from 54.5% in 2023. CSOs provide humanitarian aid, youth activities, psychological support, social services, community development, and support for veterans and vulnerable groups, creating direct relationships with beneficiaries rather than relying solely on national advocacy (ISAR Ednannia, 2025).

Community embeddedness is also visible in horizontal solidarity. Fifty-seven per cent of organizations rated mutual support among CSOs during the war as high, and another 22% as very high; shared goals and values were the most frequently cited basis for cohesion. The weakness is unequal access to larger networks and resources. Local organizations are less likely than regional or national CSOs to receive international grants, work with foreign partners, or participate in recovery projects. A "localization paradox" persists: Ukrainian and local actors perform a large share of humanitarian delivery but receive a much smaller share of direct international funding. This resource inequality does not negate community embeddedness, but it limits how far grassroots legitimacy can be converted into institutional influence.

**Trend.** Stable at a high level – local embeddedness remained strong, with 63.8% of CSOs reporting significant community impact in 2025, up from 54.5% in 2023.

**Score 4:** CSOs have deep local roots and strong horizontal solidarity, although unequal access to resources limits their institutional influence.

## C5 – Freedom of assembly

***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

The Constitution protects peaceful assembly, and ordinary law imposes no general requirement for government permission. Martial law allows restrictions for security reasons, and practice varies substantially by region. In 2025, complete bans were reported in several regions and partial restrictions in others, while Kyiv and a number of regions had no general ban. Despite these constraints, peaceful assemblies took place across the country, including anti-corruption protests, demonstrations by relatives of prisoners of war and missing persons, student protests and Pride-related events. CSO Meter recorded no general pattern of dispersal of peaceful assemblies in 2025 (ECNL & ISAR Ednannia, 2026).

The July 2025 "Cardboard Protests" were particularly important because they demonstrated the continued political relevance of assembly under wartime conditions and helped reverse legislation affecting anti-corruption institutions. At the same time, security justifications can be applied unevenly, and organizers of some events reported insufficient police facilitation or pressure connected to venue and security decisions. The absence of a dedicated comprehensive assembly law also leaves practice dependent on constitutional standards, court jurisprudence, local rules, and martial-law decisions. Freedom of assembly is therefore substantially available but not fully enabling during the period assessed.

**Trend.** Stable but constrained by martial law – assemblies continued to take place and to influence policy, while region-specific restrictions persisted.

**Score 3:** Peaceful assemblies continued across the country and influenced policy, but martial-law restrictions vary by region and are applied unevenly.



## Cluster D – CSOs as Policy Makers

### D1 – Right to participate in decision-making including in the policy cycle

> ***Standard.*** *Everyone has the right to participate in decision-making, and authorities use mechanisms ensuring meaningful public and CSO participation, with redress for non-compliance, across the whole policy cycle and without discrimination.*

Ukraine has a substantial formal framework for public participation, including Cabinet procedures, regulatory-policy consultation mechanisms and local democracy instruments. A major 2025 improvement was the entry into force of legislation that expanded forms of participation at the local level and explicitly recognized internally displaced persons as community residents. The 2025–2026 National Strategy action plan also includes measures to improve public consultation, local participation, deliberative dialogue, and CSO involvement in policy processes. CSOs can participate in international and EU-level advocacy without retaliation, and Ukrainian organizations increasingly produce shadow reports and monitor the accession process (Cabinet of Ministers of Ukraine, 2025; ISAR Ednannia, 2025).

Practice is less consistent. CSO Meter found that access to the Parliament, Cabinet, and Presidential Office remained uneven and that EU-accession working groups sometimes presented already prepared decisions rather than involving civil society early in the formulation process. Only 19.4% of CSOs in the 2025 survey rated their opportunities to influence state policy as high; 46.6% rated them medium and 34% low. Nevertheless, formal

institutions are moving in a more participatory direction, and the opening of EU Cluster 1 in June 2026 increases incentives for structured participation. The right exists and is meaningful, but it is not yet implemented consistently across the full policy cycle.

**Trend.** Improving formally – new local-participation legislation and the 2025–2026 action plan widened participation rights, although practice across the policy cycle remained uneven.

**Score 3:** The right to participate is meaningful and formally expanding, but it is not yet implemented consistently across the full policy cycle.

### D2 – Timely consultations and equal participation

> ***Standard.*** *Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible, so that grassroots and under-resourced CSOs are not excluded due to limited means.*

The central weakness of participation is not the absence of consultative mechanisms but their quality and timing. CSO Meter describes cases where consultation is late, selective or fragmented, including in the EU-accession process. Working groups may provide information on decisions that are already substantially formed, with limited public protocols, feedback or coordinated calendars. Parliament's committee system also permits substantial discretion over who is invited and who can speak. These practices favor well-connected and well-resourced national organizations over local or under-resourced actors (ECNL & ISAR Ednannia, 2026).

Resource inequality deepens this problem. Local CSOs are less likely to have international funding, dedicated policy staff, or access to central institutions, while 73% of surveyed organizations rely exclusively on volunteers. A quarter of local organizations reported no communication

with donors, and local CSOs were less integrated into recovery partnerships. Thus, even where consultation is formally open, participation costs can exclude organizations closest to affected communities. The Law on Public Consultations represents an important formal advance, but its full implementation remains delayed by the martial-law timetable. The assessed reality therefore falls short of the project standard requiring early, adequately resourced and substantively equal participation.

**Trend.** Stable, with weak practice – consultations continued to be late, selective or fragmented, and full implementation of the Law on Public Consultations remained deferred under martial law.

**Score 2:** Consultations are often late, selective or fragmented and favor well-resourced national organizations over local actors.

## D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

Ukraine has an explicit state policy framework for cooperation with civil society. The National Strategy for Promoting Civil Society Development for 2021–2026 remained in force, and in March 2025 the Cabinet approved an action plan for 2025–2026. The plan covers participation in public policy, institutional development of CSOs, social and economic development, volunteering, and cross-sector cooperation. Civil society experts were involved in its preparation, and the government published implementation updates, including information as of 1 April 2026 (Cabinet of Ministers of Ukraine, 2025; 2026).

Sectoral cooperation is also increasingly institutionalized. In 2025, CSOs were integrated into social-service delivery through public and donor-supported mechanisms, and legislation improved the tax treatment of

social-service providers. EU accession creates additional structured venues for engagement in rule of law, democratic institutions, and reform monitoring. Yet cooperation remains uneven across ministries and levels of government, and external donors, rather than the Ukrainian state, finance much of the sector's operational capacity. The government therefore recognizes and uses CSO capacity but has not built sufficiently strong domestic financial architecture to sustain it. Policy commitment to cooperation is clear and improving; implementation quality and resourcing remain the limiting factors.

**Trend.** Improving – the 2025–2026 action plan and deeper integration of CSOs into social services and EU accession strengthened the policy basis for cooperation.

**Score 3:** There is an explicit and improving policy framework for cooperation, but implementation quality and domestic resourcing remain limiting factors.

### D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Advocacy and watchdog work remain legitimate and widespread. Ukrainian think tanks, anti-corruption organizations, human-rights groups, media organizations and business associations routinely monitor government performance, propose legislation, challenge decisions and communicate with international partners. Civil society has helped shape laws on public consultations, local democracy, and administrative procedure; advocated reforms in legal education and tobacco regulation; monitored open data and the Ukraine Facility; and prepared alternative reports for the European Commission. These activities are not generally taxed or reclassified as prohibited political activity (ISAR Ednannia, 2025).

The main legal concern is the boundary between advocacy and lobbying following the Law on Lobbying, which entered into force in September 2025. CSOs raised concerns that poorly calibrated implementation could impose obligations on public-interest advocacy designed for commercial influence. No systemic crackdown through the law was documented by June 2026, so the risk remains prospective rather than established. The 2025 anti-corruption episode also demonstrated watchdog capacity: civil society mobilization challenged a government decision and achieved reversal. Ukraine therefore remains mostly enabling for advocacy, but financial dependence, legal ambiguity, and uneven access to officials prevent an unequivocal top score.

**Trend.** Stable – advocacy and watchdog work remained free and effective, while the new Law on Lobbying introduced a prospective rather than realized risk.

**Score 3:** Advocacy and watchdogging remain free and effective, while financial dependence, legal ambiguity around lobbying and uneven access prevent the top score.

### D5 – Government listens

> ***Standard.*** *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

Assessing whether the Ukrainian government "listens" to civil society requires an important qualification: civil society is not a single actor and does not speak with one voice. CSOs represent different constituencies and policy perspectives and may advocate competing or even contradictory solutions. Therefore, the government's decision not to adopt a particular CSO recommendation should not automatically be interpreted as evidence that civil society is not heard. A more appropriate test is

whether different positions can reach decision-makers, whether they are genuinely considered, and whether civil society expertise can affect the final policy outcome.

Available evidence nevertheless indicates some deterioration in perceptions of government responsiveness. The 2025 survey rated communication with public authorities at only 3.2 out of 5, with satisfaction lower at the central than at the local level. CSO Meter similarly identified weaknesses in institutional feedback: consultation outcomes and government responses are not always systematically documented, and organizations involved in EU-accession processes have sometimes reported fragmented participation or insufficient feedback after providing expertise (ISAR Ednannia, 2025; ECNL & ISAR Ednannia, 2026).

At the same time, civil society exercises substantial real influence. Government responsiveness is particularly visible where CSOs provide expertise or analytical capacity that public institutions lack. This is especially important in the EU accession process, where think tanks and expert organizations analyze the EU acquis, assess gaps in Ukrainian legislation, develop policy options, and contribute to legislative harmonization. In such areas, cooperation can go beyond consultation and approach co-production of public policy. The 2025 anti-corruption protests provide a different example: strong civic mobilization helped reverse legislation affecting the independence of NABU and SAPO.

The main weakness is therefore not a general unwillingness of the government to listen, but the uneven and insufficiently institutionalized characteristics of government responsiveness. Influence varies across institutions, policy areas and organizations, while formal feedback explaining how CSO recommendations were considered remains inconsistent. At the same time, a lower score would risk confusing government refusal to engage with civil society with legitimate government choices between competing civil society positions. Ukraine is therefore assessed as Mostly Enabling, although the weakening of institutional feedback during the assessment period should be monitored.

**Trend. Mixed** – CSO influence remained substantial where expertise was needed, but perceived responsiveness and institutional feedback weakened.

**Score 3:** CSOs exercise substantial real influence, especially where they provide expertise, but government responsiveness remains uneven and insufficiently institutionalized.

## Conclusion

Ukraine has a strong and resilient civil society. Its strength derives from civic agency, public trust, professional expertise and grassroots mobilization, built through practical engagement with citizens and reinforced since the full-scale invasion. Since then, CSOs have become an integral part of the country's resilience: they support defense and war-affected populations, deliver social services and provide policy expertise, particularly in the EU accession process, that would otherwise have had to be generated within the state. This role is widely recognized. In early 2025, around 80% of citizens trusted volunteer organizations and 61% trusted NGOs, and European partners continue to treat civil society as a central actor in Ukraine's democratic resilience and EU accession (ISAR Ednannia, 2025; European Commission, 2026). Civil society is also plural rather than monolithic: organizations represent different constituencies and may openly disagree on the same policy problem. Government responsiveness is therefore better judged by access to decision-makers, timely consultation and a realistic possibility of influence than by the share of CSO recommendations adopted. On this test, Ukraine performs better than a purely procedural assessment would suggest. Examples include expert co-production in EU accession and the successful 2025 defense of NABU and SAPO against the curtailment of their powers, which would have damaged Ukraine's relations with the EU.

Ukraine broadly meets liberal civic-space standards. Freedom of association, civic mobilization, public criticism and advocacy remain

strong, and the legal framework is broadly permissive. The remaining weaknesses lie mainly in implementation and infrastructure: uneven transparency of public institutions, delayed or fragmented consultations, banking and AML/CFT burdens, and limited institutional feedback on civil society input. Two structural challenges also require attention. First, the professional sector depends heavily on international funding, while domestic public financing remains limited and program-based. CSOs remain free to set their own agendas, but their capacity becomes more fragile when donor priorities shift. Second, mobilization, emigration, exhaustion and the movement of experienced experts into government and international organizations have reduced the sector's human capital and institutional memory, even as this transfer strengthens the capacity of the state. Overall, Ukraine is best characterized as a country of exceptionally strong civic agency, whose main task now is to build the institutions and resources that would allow this agency to translate into sustained influence.

## References


1 Cabinet of Ministers of Ukraine. (2025). Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting Civil Society Development in Ukraine for 2021–2026 (Order No. 246-r, 21 March 2025). https://zakon.rada.gov.ua/laws/show/246-2025-%D1%80

2 Cabinet of Ministers of Ukraine. (2026). National Strategy and implementation updates, including implementation status as of 1 April 2026. https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/spriyannya-rozvitku-gromadyanskogo-suspilstva/natsionalna-stratehiia-spryiannia-rozvytku-hromadianskoho-suspilstva-v-ukraini-na-2021-2026-roky/natsionalna-stratehiia-ta-plany-zakhodiv-z-ii-realizatsii

3 Civic Space Assessment Project. (2026). Civic Space Assessment Project: Common Methodology, Analytical Framework, and Set of Standards for a Liberal Model of CSO Operations (v6-FINAL, 3 July 2026).

4 ECNL & ISAR Ednannia. (2026). CSO Meter: Empowered for Action – Ukraine 2025 Country Report. Reporting period January–November 2025.

5 European Commission. (2026, June 15). EU and Ukraine open first accession negotiations cluster. https://enlargement.ec.europa.eu/news/eu-and-ukraine-open-first-accession-negotiations-cluster-2026-06-15_en

6 European External Action Service. (2026a, May 14). Rule of Law as the Foundation of European Integration: Progress on Reforms and Next Steps Discussed in Kyiv. https://www.eeas.europa.eu/delegations/ukraine/rule-law-foundation-european-integration-progress-reforms-and-next-steps-discussed-kyiv_en

7 European External Action Service. (2026b, April 20). Operation 'European Integration': Reforms in the Justice Sector / launch of Frontline for Justice. https://www.eeas.europa.eu/delegations/ukraine/eu-ambassador-ukraine-katar%C3%ADna-mathernov%C3%A1-joined-%E2%80%9Coperation-%E2%80%98european-integration%E2%80%99-reforms-justice_en

8 European External Action Service. (2026c, April 24). With EU support IER launches a new EUR 1.5 million project for Ukrainian civil society. https://www.eeas.europa.eu/delegations/ukraine/eu-support-ier-launches-new-%E2%82%AC15-million-project-ukrainian-civil-society_en

9 Freedom House. (2026). Freedom in the World 2026: Ukraine. https://freedomhouse.org/country/ukraine/freedom-world/2026

10 Institute of Mass Information. (2026a, February 16). Freedom of Speech Barometer for January 2026. https://imi.org.ua/monitorings/barometr-svobody-slova-za-sichen-2026-roku

11 Institute of Mass Information. (2026b, July 2). Freedom of Speech Barometer for June 2026. https://imi.org.ua/en/monitorings/barometr-svobodi-slova-za-cherven-2026-roku

12 ISAR Ednannia. (2025). Civil Society in Ukraine During Wartime, 2022–2025: Report on a Comprehensive Sociological Study. Kyiv: ISAR Ednannia / Social Indicators Centre.

13 Ministry of Digital Transformation of Ukraine. (2026, April 21). Automatic registration of a public organisation launched in Diia. https://diia.gov.ua/news/zapuskaiemo-avtomatychnu-reiestratsiiu-hromadskoi-orhanizatsii-v-dii

14 State Tax Service of Ukraine. (2026, April 21). State Tax Service joined the new Diia service for online registration of public organisations. https://tax.gov.ua/en/mass-media/news/1003247.html

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