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Resilience support for CSOs in the WANA region

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Introduction

The West Asia and North Africa (WANA) region has witnessed significant challenges to civil society organizations (CSOs) over the past decade. The aftermath of the Arab Uprisings in 2011, coupled with rising authoritarianism and political violence, has led to a significant shrinking of civic space. CSOs working on human rights and migrants' rights have been particularly affected due to their focus on politically sensitive issues. This study examines the threats faced by CSOs in Tunisia, Jordan, Iraq, Egypt and Lebanon, explores their adaptation strategies, and distils best practices to enhance their resilience.

Shrinking space is understood for the purpose of this study as any restrictions of the rights and freedoms necessary for CSOs, activists and individuals to operate freely and effectively. This includes limitations on freedom of association, assembly and expression, often imposed by governments or other actors, like political parties, militias or religious institutions. These restrictions are enacted through legal, financial, administrative and social measures that aim to curtail the influence and activities of CSOs, particularly those working on politically sensitive issues such as human rights, good governance or migrants' rights.

Background

The Arab Uprisings in 2011 and other mass protests for democracy thereafter did not lead to democratic transitions that the citizens had hoped for. In fact, the WANA Region as a whole has become even more authoritarian than before. Despite successful regime changes in Tunisia, Egypt and Libya, authoritarian rule persists across the region. The majority of the population in the WANA region still lacks democracy, with the region maintaining its status as the world's most authoritarian according to global democracy indices.[1]

As a result, CSOs have faced shrinking spaces due to attacks from law enforcement, religious and political actors, rising populism, and political violence, as well as legislation or regulation restricting freedom of association, assembly and expression. Over the course of the past decade, all governments in the WANA region have put civil society organizations under tighter control, and have also targeted unwanted civil society groups with repressive and legal measures to decrease their capacity to invoke change.[2] According to V-Dem, the WANA region saw significant autocratization over the decade, with many countries transitioning towards more repressive regimes. Key indicators such as freedom of association and civil society participation deteriorated sharply.[3] Furthermore, the indicator 'CSO repression' worsened in countries like Egypt, Iraq and Jordan during this period. Data from the CIVICUS Monitor confirms this trend, categorizing most WANA countries as having 'repressed' or 'closed' civic spaces by 2023. This means that CSOs face severe constraints on their operations, including legal barriers, funding restrictions and state surveillance.[4]

Since 2013, civic space in the WANA region deteriorated significantly due to rising authoritarianism and the systematic repression of CSOs. Both V-Dem data and CIVICUS reports underscore how legal restrictions, financial constraints, surveillance and public smearing have become widespread tools for suppressing civil society. While some countries like Tunisia initially showed promise for democratic development post-Arab Uprisings, they eventually followed regional trends toward autocratization. This decade-long decline highlights the urgent need for international advocacy to protect civic freedoms and support resilient civil society actors in the WANA region. However, in reality, CSOs in the WANA region face growing bureaucratic hurdles in the form of extensive reporting standards or

1 Völkl, C. Jan. 2024. Bertelsmann Stiftung.
2 Saliba, Ilyas. 2023. IDOS Policy Brief 17/2023.
3 V-Dem Report 2023
4 Access to Civicus monitor 2023

political clearance checks for international funding from key donors like Germany, the EU and the US. These growing barriers lead to prolonged approval processes and the political alienation of partners, thereby exacerbating vulnerabilities of CSOs in the region.

Goals

1. Mapping shrinking civic space for CSOs in the WANA region.
2. Collecting best practices and mitigation strategies of CSOs to increase resilience.

Research design

The study focusses on five core countries: Tunisia, Jordan, Iraq, Egypt and Lebanon. The case selection is informed by the following criteria. First, there needs to be a basic level of effective governance (no civil war or states in an active conflict, e.g. Syria, Yemen and Libya). Secondly, to investigate shrinking space for CSOs, there needs to be an independent civil society in the country. Lastly, the selection of countries for the planned study also provides variety with regard to how civic space is respected.[5]

Furthermore, this study focusses on CSOs working on human rights and migrants' rights. This selection is based on the findings that CSOs from these sectors are amongst the most affected by shrinking civic space, because they are covering politicized and conflictual topics that can present threats to the incumbent regimes and governments.[6][7][8][9] The study also focusses on these sectors because there is no substantial exchange between CSOs across these sectors in the region, neither on the repercussions they are experiencing, nor knowledge sharing on best practices in dealing with these challenges.

Methodology

To gain a comprehensive understanding of civic space and recent restrictions of CSOs, this study first reviews relevant reports by significant CSOs and international organizations, synthesizing the main observations of reports and studies on the situation of civic space in the countries of interest for this research. In addition, 10 in-depth interviews with CSO professionals and rights defenders from CSOs active in the field of human rights and migrant rights, from Tunisia, Jordan, Iraq, Egypt and Lebanon. Beyond classifying restrictions on CSOs and repercussions against their staff, the analysis of the interviews also sheds light on ways in which CSOs are adapting to shrinking space and the connected repercussions in order to continue their work. The interviews also help to assess and categorize the multitude of challenges inflicted on CSOs by restrictive and repressive measures and distil mitigation strategies and best practices amongst the surveyed organizations.

Theory of change

This study aims to go beyond only identifying the threats to civic space that affect the work of CSOs in the region; by collecting and cataloguing mitigation strategies and best practices of CSOs, it aims to kickstart a conversation on adaptation and mitigation amongst CSOs in the region to strengthen organizational and staff resilience, and prepare for increasing repression and shrinking civic space. The study thereby seeks to encourage knowledge sharing and collaboration across borders within the WANA region to counteract shrinking civic spaces and promote resilience among CSOs.

5 See: CIVICUS monitor 2023 for a regional overview. I selected at least one country from the yellow, orange and red categories.
6 People Power Under Attack 2024, CIVICUS Monitor, December 2024.
7 Amnesty International. 2017. Human rights defenders under threat – a shrinking space for civil society.
8 Amnesty International. 2025. Tunisia: Year-long arbitrary detention of human rights defenders working with refugees and migrants
9 Saliba, Ilyas. 2023. IDOS Policy Brief 17/202

Analysis
Mapping threats from shrinking space for CSOs

The analysis section of this study delves into the multifaceted challenges faced by CSOs in the WANA region, focusing on Tunisia, Jordan, Iraq, Egypt and Lebanon. The developments in these countries exemplify the broader phenomenon of shrinking civic space, characterized by increasing restrictions on freedoms of association, expression and assembly. This main section of the study first examines the specific threats to CSOs due to shrinking space in each country, evaluates the repercussions for their operations and staff, and then, in the second part, identifies strategies employed to adapt to and mitigate these challenges.

By analyzing these dynamics across the selected countries, this section aims to provide a comprehensive understanding of how CSOs are responding to the shrinking civic space. It underscores the importance of sharing best practices and cross-border collaboration to sustain civil society's critical role in promoting human rights and good governance in the WANA region.

Tunisia

Tunisia's civil society, once a beacon of hope for democratic progress following the 2011 revolution, is now facing a rapidly shrinking civic space under President Kais Saied's administration. The country, which initially stood out in the region for its relatively open environment for CSOs, has increasingly mirrored the authoritarian trends observed across the WANA region. Over the past few years, CSOs in Tunisia have encountered mounting legal, administrative and financial restrictions, coupled with targeted defamation campaigns and heightened state surveillance. These measures are systematically undermining their ability to operate freely and effectively.[10] In particular, politically sensitive topics such as human rights, governance and migration are met with heightened risks of harassment and defamation. This part of the study illustrates the multifaceted restrictions faced by Tunisian CSOs and examines how these pressures are reshaping their operational landscape and thematic priorities. By doing so, it highlights the broader implications of Tunisia's ongoing autocratization for civil society resilience and how increasing restrictions on topics, funding, registration and oversight in effect pressure CSOs into moving away from independent political work.

Legal restrictions and registration issues

In Tunisia, the legal framework governing CSOs has become increasingly restrictive, reflecting the trend of autocratization under Kais Saied. While Decree No. 88 of 2011 initially provided a cornerstone for freedom of association, recent legislative developments threaten to undermine these protections.[11] In 2023, two competing draft laws emerged – one from parliament and another from the government – both aiming to amend or repeal Decree No. 88. These proposals, criticized for their lack of civil society consultation, signal a narrowing space for CSOs by imposing stringent restrictions on foreign funding and the formation of associations. Civil society representatives have expressed deep concerns about the potential erosion of their operational freedoms under these drafts. Furthermore, CSOs were included in the Registre National des Entreprises (RNE), which allow additional forms of audits from the authorities. Most of the audits that are being carried out are related to the RNE regulations. CSOs interviewed for this study also mentioned being audited by the authorities.

Beyond legislative threats, bureaucratic hurdles also impede CSO registration and operation. A significant proportion of organizations report delays in registration processes that exceed legal timelines, as well as increased scrutiny from state institutions such as private banks, the central bank, the ministry of

10 See

11 The UN High Commissioner for Human Rights previously expressed its fear of the impact of the new draft law on the freedom of associations to organize in Tunisia.

finance and the prime minister's office.[12]
These administrative barriers are compounded by mandatory registration in the national register of institutions, which some see as a tool for greater state oversight. As has been mentioned by interviewed CSO professionals, the increasing pressure on CSOs from Tunisian authorities illustrate that they seem to be looking for evidence of misconduct or violations of due process to prepare cases to potentially dissolve them or shut them down. Financial auditing for non-governmental organizations (NGOs) has continued to increase pressure.

Overall, the evolving legal landscape in Tunisia highlights a deliberate effort to curtail the autonomy and influence of CSOs, reflecting broader authoritarian tendencies under President Kais Saied's administration. This poses significant challenges for civil society's ability to advocate for human rights and good governance in Tunisia.

Restrictions on CSO work

The restrictive environment has forced many CSOs to reconsider their focus areas. Organizations working on politically sensitive issues such as human rights, governance or migration face heightened risks, including defamation campaigns portraying them as foreign agents or corrupt entities. This hostile climate has led some organizations to shift their focus toward less contentious areas like development work or service provision. This trend reflects a broader regional pattern where CSOs are pressured to abandon independent advocacy in favour of roles that align more closely with government priorities.

According to a 2018 study by the International Center for Non-Profit Law (ICNL), 40% of the surveyed CSOs in Tunisia reported difficulty obtaining government information.[13] According to the interviews, CSOs in Tunisia have to be more careful about their research work and public events. Professionals interviewed for this study that are working with human rights or migrants' rights organizations in Tunisia mentioned that they must pay attention to what information they always keep on their phones and computers, indicating a reaction to the increasing use of surveillance, searches and detention by the Tunisian authorities.

While no Tunisian CSOs have officially been dissolved or shut down by the authorities, the arrests of civil society leaders from groups working on migrants' rights in May 2024 have led to the practical shutdown of at least three CSOs. As a result, many other organizations have stopped working on migration altogether. In addition, the increasingly common practice of summoning CSO representatives to offices of the security services or authorities for questioning has increased self-censorship amongst CSOs.

CSOs also play a crucial role in upholding electoral integrity. In Tunisia, a number of CSOs have been active in election monitoring and observation. During the last presidential elections in 2024, Tunisian and international CSOs active in election observation were hindered from monitoring the elections by the authorities.

While events by CSOs are not restricted by the authorities, the increasingly hostile atmosphere for CSOs has led to limitations of outreach events, as well as network and coordination meetings between CSOs, to protect themselves and their partners. Human rights groups reported that conducting fieldwork-based research for their reports, especially on migrants' rights issues, has become riskier. In some cases, organizations have pre-emptively limited their activities or avoided certain areas altogether to mitigate risks.

12 International Center for Non-Profit Law 2018: 27% of CSOs surveyed faced government delays beyond legal timelines when registering
13 Ibid

Defamation

The above-mentioned legal and administrative challenges are further exacerbated by defamation campaigns, regularly instigated by the statements of President Kais Saied himself targeting CSOs, particularly those working on migration and refugee rights. In these campaigns, Tunisian CSOs are frequently labelled as foreign agents or accused of financial improprieties, undermining public trust and their ability to operate effectively. Moreover, heightened financial audits and surveillance measures by private banks, as well as state authorities, against Tunisian and international CSOs create an atmosphere of fear and self-censorship among civil society actors and tie up internal resources, limiting their ability to work effectively and independently.

The increasing restrictions mentioned above have further led to chilling effects on CSO work in Tunisia. Organizations working on human rights have been particularly targeted through defamation campaigns accusing them of serving 'foreign agendas' or engaging in corruption. This rhetoric undermines public trust in CSOs and has led some organizations to cease operations altogether or shift their focus away from advocacy work toward development or service provision. In line with what the interviewees stated, a recent ICNL report concluded that 'since 2022, civil society in Tunisia has suffered from a major smear campaign, as it being unfairly linked to financial and political corruption, terrorism, money laundering and fraud'[14].

Overall, these defamation campaigns have created an atmosphere of fear and self-censorship among Tunisian CSOs. Organizations are now more cautious about conducting research or organizing public events, particularly on sensitive topics. Defamation campaigns further exacerbate these challenges. CSOs are frequently subjected to smear campaigns accusing them of financial improprieties or political interference. Such narratives undermine public trust in civil society and diminish their ability to operate effectively.

Repercussions for CSO staff

CSO staff in Tunisia are increasingly bearing the brunt of the country's shrinking civic space, facing a range of repercussions that undermine their ability to work safely and effectively. These pressures include targeted harassment, legal intimidation and restrictions on movement, which collectively create an atmosphere of fear and uncertainty.

One of the most alarming trends is the direct targeting of CSO staff through police visits, interrogations and arrests. For example, in May 2024, several human rights defenders were detained as part of a broader crackdown on civil society, with at least seven individuals still in custody. Such actions are often accompanied by invasive financial audits and investigations aimed at uncovering alleged misconduct, further intensifying the pressure on staff. These tactics not only disrupt organizational operations but also serve as a warning to others in the sector, fostering a climate of self-censorship.

Travel restrictions have also emerged as a significant barrier for CSO professionals. Staff members have reported being barred from traveling abroad for advocacy or training purposes, while partnerships with international organizations are increasingly scrutinized or obstructed. This isolation limits opportunities for collaboration and knowledge exchange, weakening the sector's resilience.

The psychological toll on staff is profound. Many report feeling constrained in their work, particularly when addressing politically sensitive topics such as migration or governance.

Fear of surveillance and potential legal repercussions has led to heightened caution in research activities and public events. Staff must also adopt rigorous digital security measures to protect sensitive information, adding another layer of complexity to their work.

14 See

Overall, the targeting of CSO staff in Tunisia reflects a deliberate strategy to weaken civil society by intimidating its most vital actors. These measures not only jeopardize individual safety but also threaten the broader role of CSOs in advocating for human rights and democratic governance.

Funding restrictions

Funding restrictions have become a significant challenge for CSOs in Tunisia, particularly as the government has intensified its scrutiny of foreign funding. These administrative and regulatory changes, which are framed as measures to combat money laundering, foreign interference and terrorism, introduce new restrictions for how CSOs can receive and use money from international donors, and are increasingly being used as tools to stifle independent civil society. Many CSOs rely heavily on international funding due to limited domestic resources, making these measures particularly debilitating.

Another concerning development is the proposed amendment of Decree No. 88. Both parliamentary and government-proposed draft amendments seek to impose severe controls on foreign funding, requiring prior approval from state authorities such as the Prime Minister's Office or the Tunisian Financial Analysis Committee (CTAF). These drafts have been criticized for granting the government broad discretion to deny funding without clear criteria or justification. Civil society actors fear that these changes will significantly restrict their ability to access international resources, thereby undermining their operational capacity.

Financial investigations and audits have increased, with some organizations facing frozen accounts or prolonged delays in accessing funds. For example, during a crackdown in May 2024, several CSOs were subjected to financial investigations, disrupting their activities and creating an atmosphere of fear among other organizations.

The broader implications of these funding restrictions are profound. They threaten the financial sustainability of Tunisia's civil society and its ability to hold the government accountable or advocate for democratic principles. Without access to adequate resources, many CSOs risk closure or significant downsizing, further eroding Tunisia's once-vibrant civic space.

Jordan

Many formal CSOs in Jordan initially focused on charitable and aid activities. Once Jordan had acceded to international conventions, such as the International Convention on Civil and Political Rights, some CSOs emerged to raise public awareness in relation to human rights, including the rights of assembly and association. At the same time, however, fundamental rights and freedoms are still subject to governmental interference, due to the government's claims of protecting national security.[15]

Today in Jordan there are thousands of registered CSOs. They can generally be differentiated into three types of organizations: associations, non-profit companies and trade unions. Each of these three organizations are registered with different ministries and therefore are subjected to different registration procedures and funding restrictions.

Legal restrictions and registration issues

In Jordan, legal restrictions on CSOs create significant barriers to their establishment and operation, severely curtailing their ability to function independently. The 2008 Law on Societies, along with subsequent amendments, imposes an extensive and opaque registration process. Organizations must submit detailed information about their founders, objectives and bylaws to the Ministry of Social

15 See

Development, which has broad discretion to approve or reject applications. This process can take up to six months, with no obligation for authorities to provide clear justifications for denials. In some cases, CSOs report being forced into negotiations over their organization's objectives or name, further demonstrating the government's intervention into the work and objectives of the CSO through the registration process.

For trade unions, there is currently no registration process in place. In the wake of the Arab Uprisings, new independent unions were founded but they were denied registration, and their leaders were arrested. It seems like the Jordanian authorities do not want new trade unions to emerge, because the established ones are well coopted and therefore do not pose a threat to the status quo and the incumbent political elites. The restrictive environment disproportionately impacts CSOs addressing human rights, workers' rights or governance issues, pushing many toward less contentious areas like education or socio-economic development. These legal barriers stifle independent civil society in Jordan, undermining its role in advocating for accountability and reform, as well as shrinking the space for civic engagement.

Restrictions on CSO work

CSOs in Jordan face significant restrictions that limit their ability to operate independently and are subject to ongoing oversight after registration. One of the most notable restrictions is the prohibition to engage in 'political activities', which are broadly defined and often used to suppress advocacy or research efforts into sensitive topics such as women's rights, LGBTIQ+ rights or human rights. Organizations addressing these types of sensitive topics are particularly vulnerable, as their work is frequently labelled as political or as a threat to national security. This has also led many CSOs to shift their focus toward less contentious areas like education or socio-economic development to avoid government scrutiny.

The Ministry of Social Development, which most CSOs that are registered as associations are registered with, requires associations to submit annual plans and financial reports, and reserves the right to attend general assembly meetings. Authorities can dissolve organizations for vague reasons, such as the aforementioned engaging in political activities. According to one CSO director interviewed for this study, civil servants of the Ministry of Social Development sometimes attend their annual meetings to gather additional information on the activities of CSOs. In a 2018 ICNS report, 49% of the surveyed Jordanian CSOs reported unannounced visits from government or security officials, interrupting their work. The Ministry of Social Development also has the right to dissolve associations on political grounds.

A 2018 study by ICNS that showed that a staggering 79% of the surveyed CSOs in Jordan believed they had no significant influence on national policy processes, and 44% of CSOs reported having no relationship with national authorities, pointing to the fact that the authorities only rarely interact with CSOs in a meaningful and constructive manner.

These restrictions are compounded by unannounced visits from security officials, which disrupt organizational operations and create an atmosphere of fear. Some organizations have also reported difficulties accessing government information or collaborating with state institutions, further hindering their work. Combined with restrictive defamation laws and penalties for online expression under the Cybercrimes Law, these measures stifle critical voices and limit the scope of civil society in Jordan. [16]

16 The International Center for Not-for-Profit Law 2018 study

Defamation

CSOs in Jordan increasingly suffer from defamation, harassment and hate speech that lead to recruitment issues and self-censorship among organizations, stifling their ability to effectively advocate for change or engage in political discourse. The increasingly hostile environment curtails civic participation and limits CSOs capacity to address societal issues or hold authorities accountable. CSOs that receive foreign funding are sometimes labelled as foreign agents, and are often framed as working for foreign interests.

In addition, governmental NGOs (GONGOs) are an increasing problem for independent CSOs in Jordan. Dozens of new GONGOs have been founded in recent years, competing for international and national funding with the independent CSOs. A professional from one of the leading human rights CSOs in Jordan interviewed for this study further highlighted that the rise of GONGOs increasingly dominates the international discourse on rights issues in Jordan, pointing to the fact that during the most recent universal periodical review at the United Nations (UN) Human Rights Council (HRC), around 20 out of the 25 CSOs that submitted statements to the UN HRC were not independent CSOs but GONGOs.

Shut down and closure

While the shut down or dissolution of CSOs by the Jordanian authorities remains a rare occurrence, the Jordanian government has increasingly targeted CSOs through restrictive laws and practices, sometimes leading to their dissolution or forced shutdown.[17] Authorities exploit vague legal provisions under laws like the Cybercrime Law, Penal Code, and Political Parties Law to suppress dissent and restrict freedom of association. High-profile cases include the dissolution of the Teachers' Syndicate in 2020 and the forced resignation of members from political parties like the Partnership and Salvation Party. These actions stifle civic engagement, erode public trust and weaken CSOs' ability to advocate for rights, leaving Jordan's civic space repressed and undermining democratic participation.[18] Professionals from human rights groups in Jordan have mentioned that the authorities have shut down the websites of CSOs on multiple occasions.

Funding restrictions

In Jordan, funding restrictions present a significant challenge for CSOs particularly those reliant on foreign funding. Under current regulations, all foreign funding must receive prior approval from the Prime Minister's Office, a process that can take up to six months and often lacks transparency.[19] In some cases, funding requests are outright denied without justification. This bureaucratic hurdle not only delays critical projects but also creates uncertainty for organizations dependent on external financial support.

The approval process requires CSOs to provide extensive details about their projects and coordinate with at least one government ministry. This level of oversight has led to concerns about government interference in the independence of civil society. Furthermore, additional regulations under the Anti-Money Laundering and Counter-Terrorism Financing Law have further complicated the funding landscape, increasing the administrative burden on organizations seeking financial support.

These restrictions disproportionately affect CSOs working on politically sensitive issues such as human rights and women's rights, as they are more likely to face delays or rejections. Many organizations have reported challenges in maintaining bank accounts or accessing funds due to heightened scrutiny by Jordanian authorities and international donors. As a result, some CSOs have shifted their focus to less contentious areas like education or socio-economic development to avoid these barriers.

17 See
18 See
19 From OCHA Report 2023 on Freedom of Association in the MENA Region p. 14.

The lack of transparency and arbitrary decision-making in funding approvals undermines the ability of Jordanian CSOs to operate effectively and independently. These restrictions not only limit their financial sustainability but also stifle their capacity to advocate for critical social and political reforms, further shrinking the civic space in Jordan.

Repercussions for CSO staff

Jordanian CSO staff face increasing repression and repercussions for their activism, severely impacting their physical safety and mental wellbeing. CSO staff have reported regular visits by intelligence services at their homes or workplace. Authorities use vague laws, such as the Cybercrimes Law and Penal Code, to arrest, detain or prosecute staff for peaceful activities, including online criticism of government policies.[20] Administrative detention is frequently employed as a punitive measure without due process. Activists and CSO employees report harassment, intimidation and surveillance, leading to self-censorship and fear of reprisal.[21]

Iraq

In Iraq, political instability and security concerns have hindered the ability of CSOs to operate freely and effectively.[22] Moreover, legislative and regulatory changes have increased legal and administrative barriers to registration and are restricting the ability of CSOs to work independently and effectively. The restrictive environment not only stifles civic engagement but also weakens democratic participation and transparency in Iraq. Without significant reforms to protect the rights of CSOs, the shrinking civic space will continue to erode the essential role of civil society in promoting social justice, accountability and inclusive governance in the country.

CSOs working on sensitive issues, including human rights advocacy and anti-corruption efforts, are particularly vulnerable to government scrutiny and retaliation. Smaller organizations and grassroots initiatives face disproportionate challenges due to limited resources for navigating bureaucratic hurdles. These constraints severely undermine the ability of CSOs to address pressing societal issues, advocate for marginalized groups or hold authorities accountable.

Legal restrictions and registration issues

In Iraq, legal and administrative barriers, such as the 2010 Law on Non-Governmental Organizations, impose burdensome registration processes and grant authorities excessive discretion to deny or delay applications. Organizations must navigate complex bureaucratic processes, including obtaining approvals from multiple government entities, which creates significant barriers to entry for new initiatives and grassroots efforts.

Iraq's NGO Directorate requires all aspiring organizations to obtain approval from the Supreme National Commission for Accountability and Justice, before they are allowed register. Branches of foreign NGOs that seek to register in Iraq must provide a copy of the Iraqi nationality certificates and civil status identity cards of their Iraqi staff, as well as copies of the passports and residence documents of their foreign staff (Article 25 of Law 12 of 2010). This has been criticized as a barrier to the registration of foreign NGOs, which may have concerns about the security of their staff if their identification information is shared with the authorities.

20 See
21 See
22 From OCHA Report on Freedom of Association in the MENA Region p. 16.

According to one interviewee, the NGO directorate and the Ministry of Interior have made it harder to receive registration as a CSO and the extent of corruption in this process has grown. This makes it more difficult to start a new CSO and can be seen as part of a wider effort to weaken independent civil society in Iraq by politicians and the authorities. In the Kurdistan Region of Iraq (KRI), the NGO Department requires foreign organizations to renew their registration every year.[23]

Iraqi authorities also use vague legal provisions to monitor and control CSO activities, including the power to dissolve organizations for broadly defined violations such as 'threatening public order'. This fosters an environment of uncertainty and fear, pushing many organizations toward self-censorship to avoid government scrutiny or retaliation.

These restrictions disproportionately affect smaller CSOs and those working on sensitive issues such as human rights or anti-corruption, limiting their ability to address pressing societal challenges. The restrictive legal framework not only stifles civic engagement but also constrains the critical work of civil society in addressing Iraq's social and political challenges.

Restrictions on CSO work

According to the CSO professionals interviewed for this study, since 2019, when protests led to the breakdown of the Iraqi government, religious actors and political parties are more actively repressing independent CSOs and have also created their own "CSOs" affiliated with established political parties, militias or religious groups. These GONGOs advocate against minority rights and a free press while using their platform to spread the political or religious messages of their political or religious leaders.

The 2023 ban on the word 'gender' exemplifies the restrictive landscape for CSOs and journalists in Iraq. Such linguistic constraints create a chilling effect, ultimately limiting the work of CSOs working on women's rights and gender equality.

Iraqi authorities and ministries do not provide information or statistics that CSOs or the public could rely on to assess their performance, ultimately undermining efforts to establish accountability and increasing the lack of trust with the government. Moreover, CSO work in Iraq is severely constrained by self-censorship, particularly regarding government criticism and corruption, since the authorities view CSO work as a threat unless it presents overly positive narratives of government policies and projects.

According to two CSO professionals interviewed for this study, the Ministry of Higher Education ordered universities not to cooperate with 13 CSOs, singling out organizations that work on human rights and women's rights issues. Professionals of these CSOs were also banned from entering Iraqi universities and organizing events involving students.

The lack of government support and cooperation exacerbates these challenges, with many CSOs reporting difficulties in coordinating with authorities or obtaining necessary permits for events and activities. Interventions by the authorities and security services have led to cancellations of certain CSO activities, particularly public or networking events. This has occurred mainly in the southern areas, but more recently, also in Kurdistan. Interviewees reported that hotels and event venues must provide participant lists and agendas of CSO meetings to the security services.

Iraq's outdated Penal Code, dating back to 1969, criminalizes defamation with vague provisions that are often used to target activists, journalists and dissenting voices. These laws allow authorities to prosecute individuals for 'insulting' officials or institutions, regardless of the truth of their statements. Although prison sentences are rare, the legal processes themselves act as a form of punishment, deterring free expression and activism.

23 see

Defamation

Many CSOs report facing ongoing harassment and intimidation, including threats to staff members, surveillance and interference in their activities. Activists and CSO professionals frequently receive threats from anonymous sources or government-linked actors, forcing organizations to self-censor or avoid addressing sensitive issues like corruption or human rights abuses. This environment not only creates a climate of fear and limits CSOs' operational capacity but also endangers the lives and well-being of those advocating for change. Public mistrust of CSOs, fuelled by negative media portrayals or political rhetoric, further undermines their credibility and engagement efforts.

The government's public shaming of CSOs receiving US or European funding has further complicated matters, leading many organizations to hesitate in accepting western donor support or disclosing their funding sources. Some CSOs receiving foreign funding from western donors have also faced defamation and intimidation by GONGOs and religious actors based on unfounded accusations of espionage for foreign powers.

Furthermore, the Iraqi government has launched a campaign against social media content creators under the pretext of combating 'low-quality content'. This crackdown has targeted influencers, activists and journalists by means of intimidation and harassment. Since the spring of 2023, the government's actions have been extensive: 13 creators have been arrested, 64 others are awaiting trial, and over 1,000 have received warnings. The definition of 'low-quality content' remains vague, with an appointment process for the judging jury that notably excludes journalists, raising serious concerns about the arbitrary nature of these suppressions.

Surveillance

Authorities have reportedly employed monitoring tactics, including digital surveillance, to track the activities of CSOs and activists. These measures often target organizations advocating for human rights, transparency and accountability, creating an atmosphere of fear and self-censorship. Interviewees have also mentioned instances of active surveillance through the planting of informants by the security services into CSOs and CSO events.

Arrests

Arrests targeting CSO professionals and activists in Iraq are often politically motivated, aimed at silencing dissent and intimidating human rights defenders. Activists advocating for transparency, accountability and human rights frequently face arbitrary detention, harassment and legal persecution under vague charges such as 'undermining state security' or 'defamation'.

The Iraqi government has been accused of using anti-terrorism laws to suppress peaceful activism. Many detained activists report being subjected to ill-treatment or denial of due process, including restricted access to legal representation. Such actions create a climate of fear, forcing many CSOs and activists into self-censorship or exile.

In the Kurdistan Region of Iraq, authorities have intensified crackdowns on activists and journalists through arbitrary arrests, enforced disappearances and prosecutions based on vague laws. Many detainees face torture or ill-treatment, and fabricated charges are often used to silence dissent. Family members of activists are also harassed, creating a climate of fear that stifles civil society work.

Reports by human rights organizations indicate that Article 430 of the Iraqi Penal Code, which criminalizes threats involving harm to individuals, property or reputation with penalties of up to seven years in prison, has been misused by authorities to target human rights defenders.

Funding restrictions

International funding has been redirected from Iraq to other crisis areas like Ukraine and Gaza, significantly reducing financial resources available for Iraqi CSOs. The stringent banking rules and the weak financial sector create substantial obstacles for funding to enter the country and support local CSOs. Moreover, Iraqi CSOs face challenges in accessing funding due to stringent regulations. The law requires organizations to disclose detailed financial information and seek approval for receiving foreign funding, which is often delayed or denied arbitrarily. This restricts their ability to secure resources critical for implementing programmes and advocating for marginalized communities.

While there are no restrictions on receiving foreign funding for CSOs in Iraq, political interference by government institutions that must approve funding from international donors has increased according to two CSO professionals interviewed for this study. Moreover, large international donors like USAID, the German GIZ or French AFD do tend to informally ask the Directory of Non-Government Organizations (DNGO) or the Prime Minister's Office for approval for funding Iraqi CSOs. According to an interviewee, there have been increasing instances of interference in international funding for CSOs by the Ministry of Planning. Iraqi authorities also increasingly trying to control which Iraqi CSOs are meeting foreign representatives via embassies in Baghdad.

Shut down and closure

A number of women's rights and LGBTIQ+ rights groups have been suspended, and other organisations have also been banned, although mainly ones that were not legally registered.

Egypt

Since the military coup in 2014, the environment for CSOs has become increasingly hostile. Due to state-sponsored campaigns of intimidation, harassment and the closure of CSOs, there is a climate of fear with many CSOs and their staff, who are facing persecution, asset freezes and arbitrary arrests due to their work. Moreover, the Egyptian 2019 NGO Law imposes severe restrictions on the activities of NGOs, including stringent regulations on foreign funding and the requirement for prior government approval for most CSO activities.

Legal restrictions and registration issues:

The legal framework governing CSOs in Egypt imposes severe restrictions that significantly undermine their ability to operate freely. The 2019 NGO Law requires all NGOs to register with the government and obtain prior approval for their activities, funding and publications. Organizations (and their staff) that fail to comply face arbitrary arrests, dissolution and asset freezes. The law's vague language, such as prohibiting activities that allegedly threaten 'national security' or are deemed 'political', allows for arbitrary enforcement that stifles human rights work and advocacy, as well as any political work that is deemed contrary to the interest of the incumbent military regime.

Law 149 requires that associations have 10 founding members and a physical headquarters. Registration is mandatory for all entities that practice 'civil work', defined in the law as non-profit activities that aim to achieve societal development. Informal (unregistered) associations and foundations are prohibited. Registration is by 'notification', but the process requires submission of extensive documentation, and allows the ministry broad discretion to reject the registration during a 60-day waiting period.[24]

24 see

The registration process for CSOs itself is burdensome, requiring extensive documentation and compliance with complex bureaucratic procedures. As of April 2023, thousands of NGOs risked closure for failing to meet the stringent requirements. High-profile organizations like the Arab Network for Human Rights Information (ANHRI) have ceased operations due to the repressive environment. Furthermore, authorities frequently delay or deny project approvals and funding requests for registered NGOs, effectively paralyzing their work.

Restrictions on CSO work

In Egypt, the authorities try to ascertain more thorough control of the work CSOs are conducting in the country. This attempt at instrumentalization of CSOs for government development policy goals is effectively undermining independent CSO work. In effect, CSOs are supposed to pursue less political work and instead focus on contributing to improving the livelihoods of Egyptians, with a focus on socio-economic development or basic goods provision. Associations are limited to activities in the fields of development and social welfare. Numerous activities are prohibited, including any activity that 'violates the public order, public morals, national unity or national security'. The above-mentioned 2019 NGO Law also gives authority to government officials to inspect an association's premises at any time and otherwise interfere in the association's internal affairs, including the ability to review and reject decisions made by the association's board. Sanctions for legal violations include steep fines for individuals and dissolution of an association.[25]

Advocacy for changes in policy or any other form of contributions to policy process is impossible. When it comes to issues of migration and environmental protection, there have been attempts by government organizations to compete with CSOs for international funding to undermine their ability to continue their more critical work on these issues.

Surveillance

Activists are monitored through sophisticated surveillance technologies. Digital harassment, including hacking and spyware attacks, is common. Physical surveillance and intimidation by state security forces are routine, especially during public events like the COP27 climate summit. Furthermore, security services regularly recruit staff members at CSOs as spies or try to infiltrate existing CSOs with regime loyalists who are tasked to report on the activities of the CSO.

Defamation

State-controlled media frequently launches defamation campaigns against activists to discredit them domestically. These campaigns frame activists or entire CSOs as traitors or foreign agents working against national interests. In particular, human rights, migrant rights and LGBTIQ+ rights groups working with international partners or receiving funding from international donors have been targeted by such defamation.[26] The intense state-sponsored defamation campaign to delegitimize the work of independent CSOs peaked around 2016–2020 and has been winding down since then.

Shut down and closure

While beyond the organizations believed to be connected to the Muslim Brotherhood only a few CSOs have been dissolved by the Egyptian authorities, many were suspended or their assets were frozen so that they had to cease their operations.

25 see

26 Shaimaa Magued 2024.

CSOs in Egypt have been forced to shut down based on to the repressive 2019 NGO Law, which imposes severe restrictions on registration, funding and activities. Organizations that fail to comply with this law face dissolution. For example, the ANHRI one of Egypt's oldest human rights organizations, closed in January 2022 after citing an inability to operate under these conditions.

Further, the Egyptian authorities have blocked at least 600 websites since 2017, including those of human rights organizations, political platforms and independent media outlets. This censorship violates the right to access information and freedom of expression. Among the blocked sites are 15 human rights websites, reflecting a deliberate effort to suppress civil society's online presence.

International NGOs and partnerships

Since the military coup, authorities have prevented international CSOs from entering Egypt and establishing chapters or setting up offices in the country. Amnesty International and Human Rights Watch have both tried to establish offices in Egypt to no avail. Moreover, some international CSOs, especially those supporting Egyptian rights groups, have been kicked out. Some international CSOs regained access to Egypt in recent years but they had to adapt the focus of their work to less contentious issues.

Egyptian CSOs must obtain prior permission from the authorities before they 'join, affiliate, participate, or cooperate, in any other form' with any foreign organization or entity. They must also obtain permission before they employ non-Egyptians, whether as workers or volunteers. Further, foreigners are not allowed to make up more than 25% of an association's board or membership.[27]

Funding restrictions

Funding restrictions for CSOs in Egypt are a significant tool of repression, severely limiting their ability to operate independently. The 2019 NGO Law imposes stringent regulations on receiving foreign funding, requiring prior government approval for any external financial support. This process is often arbitrary and opaque, with authorities delaying or denying funding requests without justification. Failure to comply can result in severe penalties, including asset freezes, travel bans or even imprisonment for activists and organizational leaders.

The authorities must issue a special letter to a bank affiliated with the Central Bank of Egypt before an association may open a bank account. CSOs must notify the authorities before they receive foreign funds or funds from Egyptian individuals abroad, and wait 60 days, during which the authorities can object the funding and the receiving CSO cannot use the funds. Notification to the authorities is also required when a CSO receives or collects donations from domestic sources. A special license is required to carry out fundraising.[28]

The Egyptian government has weaponized these restrictions to stifle dissent and suppress human rights work. For instance, Case No. 173, known as the 'foreign funding case', has targeted numerous NGOs and activists since 2011, accusing them of receiving illegal foreign funds to destabilize the country. Many prominent human rights defenders remain under investigation, their assets frozen and their travel restricted.

Overall, funding from international donors for civil society support, especially from Europe and North America, has been declining over the past decade. Increasing political and administrative oversight and restrictions by international donors on CSOs have also increased the workload for Egyptian organizations receiving foreign funding. Some Egyptian CSOs have been excluded from receiving German and US

27 see

28 Ibid

funding due to the statements of their leadership or staff on Israel's conduct of the war in Gaza.[29] As a result of these funding withdrawals, some Egyptian human rights groups are boycotting German institutions in Egypt, even to the extent that the largest Egyptian human rights organization did not want to cooperate with the author of this study for an interview because it is funded by a German political foundation.

Moreover, Germany's backing of Israel's military actions has led some WANA-based NGOs to suspend public cooperation with German partners, including political foundations, to avoid association with policies perceived as enabling violence in Western Asia.

Repercussions for CSO staff

The risks for individuals (professional and activists alike) engaged in CSO work in Egypt remains very high. CSO staff have been arbitrarily arrested, had their private assets frozen, been put under travel bans or been enforcedly disappeared, to prevent them from continuing their work.[30]

Especially prominent Egyptian activists or CSO professionals are frequently placed under indefinite travel bans and asset freezes. These measures restrict their mobility and financial independence, as well as isolating them from international advocacy efforts.

Authorities also often target the families of activists as a form of reprisal. Family members are subjected to arbitrary detention, questioning or harassment to pressure activists into silence or compliance. Even exiled activists are not immune from persecution. The Egyptian government employs transnational repression tactics, such as revoking passports, denying consular services or placing dissidents on terrorism lists.

Lebanon

The number of CSOs in Lebanon has risen consistently over the past decades. According to the Ministry of Interior and Municipalities, there are 11,676 registered associations.[31]

Many local civil society organizations are affiliated with political groups or parties, and therefore mostly focus on the needs identified in specific communities to maintain their patrons' political influence. At the same time, sectarian divisions and rising poverty has prompted CSOs to step in and address the escalating needs of the society. CSOs have played a major role in contributing to the formation of movements and protests against the government's performance and lack of services and accountability. For instance, during the 2015 #YouStink garbage crisis protests and the nationwide October 17, 2019 uprising, activists from civil society organisations played a prominent role in mobilizing protesters across the country (although no CSOs were organizing the protests).

More recently, CSOs played a crucial role in the 2020 Beirut Port blast recovery response, providing short-term and emergency relief and humanitarian assistance, as well as long-term aid to help people cope with the crisis, coupled with a combination of financial crises and the COVID-19 pandemic. Shifting from protest mobilization to supporting recovery, CSOs engaged in recycling, reconstruction, and providing shelter and basic needs for those directly affected.

Despite the crucial role CSOs are playing, a 2018 study by ICNS showed that 33% of surveyed CSOs said they had no relationship with national authorities and 68% felt they had no influence on national

29 see

30 Amnesty International: "Egypt: Independent civil society organizations at risk of closure after NGO deadline passes" (April 2023).

31 See: however, it is unclear how many of them are still active.

policy processes.[32] Moreover, the government's desire to regulate and control the response to the Syrian crisis led to tighter restrictions on CSO activities, particularly those working on migrant issues or supporting refugees. In the past years, CSO work that treats Syrians as the holders of rights and freedoms has been criminalized and any activities are only possible in closed-door formats in Lebanon. Syrian activists have been at threat of deportation and have fled the country as a result. Even International CSOs (also referred to as INGOs) have used their privileged position to work on these issues are faced with legal and increased financial and administrative scrutiny, as well as restrictions by banks and state.

In a recent study on public perceptions of civil society in Lebanon, around half of respondents expressed a lack of trust in CSOs. Notably, 32.2% were strongly distrustful of CSOs, while 15.9% expressed relative distrust. A significant 17.3% of respondents remain neutral on the topic, with 30.1% indicating some level of trust. However, strong trust in CSOs is relatively low, at only 4.5%.[33]

Legal restrictions and registration issues

Lebanon's civic space has been increasingly constrained in recent years, with legal restrictions and bureaucratic hurdles significantly impacting the operations of CSOs. The Lebanese legal framework, while nominally allowing freedom of association, imposes onerous requirements for CSO registration. Although Lebanon has a relatively open environment for NGOs, there are still challenges related to bureaucratic inefficiencies and the need for a more streamlined registration process.[34]

Organizations must navigate a complex process involving approval from the Ministry of Interior, which retains broad discretion to reject applications without clear justification. This lack of transparency fosters an environment of uncertainty and limits the establishment of new CSOs.

While registration is still comparatively easy for CSOs in Lebanon, for many years, Lebanese authorities misapplied the Law on Associations by often taking months, or in some extreme cases years, to deliver a receipt of notification. Without this receipt from the authorities, CSOs could not take full advantage of the rights and privileges afforded to registered entities.

Human rights organizations report that existing laws are often arbitrarily enforced, with authorities targeting groups addressing sensitive issues such as corruption, human rights abuses or LGBTIQ+ rights. CSOs are frequently subjected to intrusive monitoring, including demands for detailed financial and operational records. These practices create a chilling effect, discouraging activism and advocacy.

Moreover, amendments to laws governing assembly and association have introduced additional barriers. For instance, vague provisions in anti-terrorism laws are sometimes used to criminalize dissent or restrict funding for CSOs under the pretext of combating illicit activities. These measures disproportionately affect smaller organizations lacking resources to comply with stringent requirements.

Restrictions on CSO work

Lebanon's legal framework ostensibly guarantees freedom of the press through its constitution and international commitments. However, outdated and contradictory laws – such as the 1962 Press Law,

32 The International Center for Not-for-Profit Law (ICNL), in cooperation with Beyond Reform & Development and Minneapolis. 2018: The state of Civic Freedoms in the Middle East and North Africa. Access to associational Rights in Morocco, Tunisia, Lebanon, Jordan and Kuwait.

33 Mirna Ghanem January 2024: Public opinion perspectives on governance and civil society organizations in Lebanon, funded by the Samir Kassir Foundation and the Dutch Ministry of Foreign Affairs.

34 From 2023 OCHA Report on Freedom of Association in the MENA Region p. 23.

the 1994 Audiovisual Media Law, and provisions of the Penal Code – impose significant restrictions. These laws criminalize speech and content deemed contrary to 'national ethics' or 'religious feelings' and allow for prosecution in special courts or even military tribunals. Interviewees reported that hotels and event venues provide participant lists and agendas of CSO meetings to the security services. CSO activists and professionals face threats, fines and politically motivated lawsuits, creating a chilling effect.

The financial crisis has led to stringent banking controls that limit withdrawals and transfers, hampering NGOs' ability to fund projects or pay staff. This has forced some organizations to establish operations abroad to maintain functionality. After the 2020 Beirut Port explosion, NGOs were required to obtain government approval for surveys of affected areas – a process described as pro forma but indicative of increasing oversight. 'Secret' or unregistered associations are banned outright, further curtailing civic activities.

Lebanon's sectarian-based political system fosters clientelism and elite capture, which undermine governance and policymaking. Political instability creates an unpredictable operating environment for CSOs through the selective enforcement of laws based on political or sectarian considerations. NGOs focusing on "controversial" topics such as LGBTIQ+ rights or refugee issues face heightened scrutiny and potential crackdowns. This dynamic weakens trust between civil society and state institutions while exacerbating divisions within society.

Defamation

Defamation campaigns and hate speech are significantly undermining the work of CSOs in Lebanon. Activists and CSOs are frequently targeted with accusations of foreign influence and corruption, creating mistrust among the public and exposing them to physical and verbal attacks in the field. Media outlets, often aligned with political or religious factions, amplify these accusations, further damaging the reputation of CSOs and discouraging their activities.[35] Furthermore, pressure and intimidation by non-state groups such as Hezbollah or Junud Al-Rabb against CSOs, as well as individual CSO workers and activists, are restricting the work of CSOs.

LGBTIQ+ organizations face particularly severe challenges. Events on minority and women's rights are often cancelled due to security concerns by organizers. Some CSOs working on LGBTIQ+ rights have been banned entirely, with even private venues refusing to host them due to pressure exerted by the authorities, or religious and political groups. These cancellations are justified referencing vague provisions in Lebanon's criminal law, such as references to 'natural sexual behaviour', reflecting systematic discrimination. Moreover, hate campaigns against LGBTIQ+ have increased and even became violent in 2023.[36]

This hostile environment, fuelled by defamation laws and hate speech, not only stifles freedom of expression but also hinders CSOs' ability to advocate for marginalized communities and address critical social issues effectively.[37]

Arrests

Arrests and attacks on CSO activists and professionals in Lebanon are severely impacting their ability to operate effectively. Journalists and activists face prosecution in military courts, with some subjected to imprisonment and even torture, as highlighted by the recent imprisonment of a journalist by a military court for the first time in decades. Such actions undermine freedom of expression and create a climate of fear among CSO workers.

35 see

36 See, for example: billboard campaign "Undo the damage" 2024.

37 see

These incidents are part of a broader pattern of repression, where activists are targeted for their work, particularly on sensitive issues such as human rights or marginalized communities. Military courts, lacking independence, often dismiss torture complaints or reduce charges, perpetuating impunity for abuses. This hostile environment discourages activism, forces some to self-censor or flee the country, and weakens the capacity of CSOs to advocate for justice and accountability in Lebanon. Individuals and civil society groups that are working on religious issues or the rights of vulnerable groups, such as migrants or refugee rights, are particularly criminalized.

Access to funding and restrictions

Funding restrictions present significant challenges for CSOs in Lebanon, particularly in accessing foreign funding. The ongoing economic and banking crises have severely limited CSOs' ability to withdraw or transfer funds, delaying project implementation and aid delivery. Fluctuating exchange rates and administrative hurdles further complicate financial management, straining relationships with donors and meeting programme deadlines.

Moreover, the absence of a public fund for CSOs forces reliance on international donors, often with stringent requirements or political conditions. Smaller local organizations face difficulties competing with larger international CSOs for grants, limiting their access to vital resources. Public misconceptions about foreign funding also fuel mistrust, with accusations of corruption or hidden agendas undermining CSOs' credibility and effectiveness. [38]

Furthermore, the funding available from international donors for CSO work on rights issues in Lebanon has declined over the past decade and much of the international funding has focused on the plight of the Syrian refugees in Lebanon.

Repercussions for CSO staff

The work of CSO staff and activists in Lebanon is increasingly fraught with danger. Professionals and activists face threats, attacks and even death because of their work. Both the Israel Defense Force (IDF) and Hezbollah have restricted and threatened Lebanese CSO staff documenting violations of international humanitarian law and human rights. Journalists have also been targeted by both parties during the recent escalation of violence. Furthermore, the destruction of homes and displacement of CSO staff because of the conflict further disrupted CSO operations during 2024.

Additionally, as stated in multiple interviews conducted for this study, critical CSOs and activists are increasingly monitored, and political parties use social media accounts to harass them online. This creates a hostile environment, forcing many to self-censor or operate under constant fear. Such repercussions not only endanger individuals but also weaken CSOs' ability to advocate for human rights and provide essential services.

Best practices and mitigation strategies of CSOs

Despite the challenges documented above, CSOs in Tunisia, Jordan, Iraq, Egypt and Lebanon have demonstrated remarkable resilience. By adopting innovative strategies tailored to their specific political and legal contexts, these organizations continue to operate under increasingly hostile conditions. This section examines the best practices and adaptation strategies employed by CSOs in each country. Drawing on interviews with CSO professionals and reports from human rights organizations such as Amnesty International, Human Rights Watch and local CSOs from the region, it identifies the mitigation strategies these groups use to sustain their work.

38 see

The adaptive strategies adopted by CSOs include: registering abroad or adopting registration as other entities to bypass restrictive regulations on CSOs; relocating staff for safety; enhancing digital security to protect sensitive data; diversifying funding sources to ensure financial stability; engaging in coalition building and international or national advocacy; and conducting regular risk assessments with their staff to mitigate the dynamic threats arising from shrinking civic space. These strategies often come at significant costs to organizations and their staff – financially, operationally and emotionally.

This section is again organized into short country-specific examples that illustrate how CSOs in Tunisia, Jordan, Iraq, Egypt and Lebanon respond to the unique challenges they face. While each country subsection explores how local organizations are responding to shrinking civic space, it is possible to draw lessons that can inform efforts in other countries affected by similar restrictions of civic space.

Tunisia

Tunisia's civil society landscape has deteriorated significantly under President Kais Saied's administration. Once celebrated as a model of democratic progress following the 2011 revolution, Tunisia more recently mirrors regional trends of autocratization, such as in Egypt. Relevant legal frameworks such as Decree No. 88 of 2011 – which initially guaranteed freedom of association – are being amended to impose stricter controls on foreign funding and registration processes for CSOs.

In response to these challenges, Tunisian CSOs have adopted several mitigation strategies. Larger organizations have **strengthened their legal teams** to protect against arbitrary arrests, office raids or asset freezes. Some organizations have **registered abroad or relocated their operations** entirely to avoid restrictive domestic regulations. For example, several groups working on migration rights have established offices in neighbouring countries after facing defamation campaigns labelling them as foreign agents, some Tunisian human rights CSOs have recently set up branches in European countries and some have relocated their staff there too, to ensure their personal safety. This mirrors strategies adopted by Egyptian CSOs in recent years.

Some CSOs have **strengthened their digital security training and protocols** to safeguard sensitive data from state surveillance. In larger organizations, regular risk assessments are conducted to monitor evolving legal and security threats to their organisation and their staff. To avoid censorship and to circumvent other barriers to traditional media, CSOs are **increasingly utilizing social media** and online platforms. Other organizations have **reduced public visibility** by shifting activities online or holding closed events. This minimizes exposure while maintaining engagement with stakeholders. The arrests of three human rights defenders in May 2024 have led many groups to **shift their focus away from politically sensitive topics** toward less contentious areas like development work or service provision. While these measures help mitigate risks, they also severely limit the ability of CSOs to engage openly with the public and advocate for change effectively.

An interviewee from a CSO in Tunisia pointed out that: 'Thinking about next steps and strategic planning is difficult when we are not sure our office here will stay open much longer.' In fact, the shrinking civic space in Tunisia and the continuous attacks on civil society by the authorities make cooperation and exchange between CSOs more difficult, since organizations that are attacked often react by shutting themselves off, refusing to share information to protect themselves, which in effect hinders others' ability to help them. Therefore, it becomes more difficult to coordinate and support each other between organizations, to jointly strategize, or to find the motivation and imaginative ways to counter the rising challenges and restrictions. This situation also takes a mental toll on CSO staff.

Iraq

One of the primary strategies adopted by Iraqi CSOs is **operating clandestinely** to avoid drawing attention from state authorities or militias. Due to pervasive surveillance, many organizations have stopped publicizing their activities altogether. For example, a representative of the MOJA NGO explained that over the past three years, his organization has ceased taking photos or sharing public updates about its work out of fear of retaliation. This approach allows organizations to continue their operations discreetly while minimizing the risk of harassment or shutdown.

Clandestine operations are particularly crucial for organizations addressing politically sensitive topics such as governance or anti-corruption. Public visibility in these areas often invites scrutiny and accusations of foreign influence or subversion. By keeping a low profile, CSOs can avoid becoming targets while still delivering essential services and advocacy efforts. However, this strategy comes at a cost: reduced visibility limits the ability of organizations to engage with broader audiences or build public support for their causes.

Self-censorship is another widespread practice among Iraqi CSOs. Organizations carefully avoid addressing topics that could provoke backlash from authorities or conservative elements within society. Issues such as gender equality and LGBTIQ+ rights are particularly sensitive and are often excluded from organizational agendas entirely. One interviewee from an Iraqi CSO noted that discussing these topics can lead to an organization being suspended or targeted by defamation campaigns.

In addition to avoiding controversial topics, CSOs also exercise caution in their language and framing when discussing other issues. Advocacy efforts are carefully calibrated to align with government 'red lines' to avoid accusations of political activism or foreign interference. While self-censorship enables organizations to continue operating in a restrictive environment, it also limits their ability to address critical human rights issues comprehensively.

Risk management and digital security are key strategies employed by Iraqi CSOs to counter the effects of an increasingly surveilled and hostile work environment. Digital security training is particularly important for protecting sensitive data and communication channels from surveillance or hacking attempts. Women journalists and activists face heightened risks online, including harassment and doxxing, making digital security measures even more critical for this group. Staff are trained in secure communication methods and tools to ensure that organizational activities remain confidential. In addition to digital security, physical security protocols are also adjusted based on the context. For instance, staff may alter their travel routes or meeting locations to avoid detection by hostile actors. These measures reflect the precarious nature of civil society work in Iraq and the lengths to which organizations must go to protect their staff and operations.

International advocacy is another key strategy employed by Iraqi CSOs to mitigate restrictions on their work. By engaging with embassies and donor governments, organizations can leverage international pressure to push for policy changes domestically. One of the interviewees highlighted how such efforts successfully led to the lifting of a ban on higher education cooperation programmes – a significant victory for civil society.

Engaging international actors also provides CSOs with opportunities to secure funding and technical support for their work. However, this strategy is not without risks. Accepting funding from certain sources – such as US-based donors – can lead to defamation campaigns accusing organizations of being agents of foreign influence. To mitigate this risk, some organizations have paused receiving funds from controversial sources while continuing to engage diplomatically with international stakeholders.

While **coalition building** is often seen as a vital strategy for collective resistance against shrinking civic space, it poses unique challenges in Iraq due to infiltration risks. Efforts to form alliances among CSOs are frequently undermined by political parties or religious groups seeking to co-opt civil society initiatives. This dynamic fosters distrust among organizations and limits opportunities for collaboration.

Despite these challenges, some Iraqi CSOs continue to pursue coalition building as a way to amplify their advocacy efforts. By working together on shared goals – such as reversing restrictive policies or advocating for greater transparency – organizations can pool resources and expertise while presenting a united front against repression. However, these efforts require careful vetting processes and trust-building mechanisms to minimize the risks associated with infiltration.

Some organizations have also explored **alternative registration models** –such as creating sister entities abroad – to bypass domestic restrictions on funding or operations. However, as a few of the Iraqi interviewees noted, this approach is often impractical due to the administrative burden involved and donor preferences for locally registered entities.

Jordan

One of the key strategies adopted by Jordanian CSOs is **dual registration**. To bypass the stringent regulations imposed on associations under the 2008 Law on Societies, some organizations register as non-profit companies under the Companies Law. This alternative legal framework offers greater flexibility in operations, as it is subject to less oversight from the Ministry of Social Development. For example, the Phoenix Center operates as both a non-profit company and a profit-oriented entity, allowing it to implement projects flexibly based on two different regulatory contexts.

While dual registration provides a practical workaround for restrictive laws, it also comes with limitations. Organizations registered as non-profits under the Companies Law are prohibited from engaging in certain types of advocacy work and face challenges in accessing international funding. Some donors are reluctant to fund non-profits registered as companies due to concerns about transparency, accountability and due diligence. Nevertheless, this strategy allows Jordanian CSOs to maintain a higher degree of operational independence while continuing their work, even on contentious issues.

Other Jordanian CSOs have **shifted their focus from politically sensitive issues to less contentious ones,** such as education, socio-economic development and community service, to avoid excessive government scrutiny. Advocacy efforts on sensitive issues are carefully framed within international obligations, such as reporting to the UN's HRC or the UN's Sustainable Development Goals (SDGs). Some CSOs argue that by aligning their work with international frameworks, they can engage in advocacy without directly challenging domestic political sensitivities. For instance, some CSOs have redirected their efforts toward promoting economic empowerment or addressing youth unemployment – issues that align with government priorities and are less likely to provoke repercussions than working on women's rights or towards enhancing gender equality. While this shift enables CSOs to continue operating within the confines of restrictive laws, it also limits their ability to address critical human rights issues comprehensively.

Similarly, **self-censorship** has become a widespread practice among Jordanian CSOs. Organizations carefully choose their language and topics of advocacy to avoid crossing government 'red lines'. For example, issues related to LGBTIQ+ rights or political reform for more democracy are often excluded from organizational agendas due to the high risk of retaliation by the authorities or religious groups. This cautious approach extends to public statements and event planning, with many organizations opting for closed-door meetings or online activities, instead of public conferences or discussions to minimize visibility. While self-censorship allows CSOs to navigate a restrictive environment without

attracting undue attention, it also undermines their ability to advocate effectively for marginalized communities or challenge systemic injustices, since the need for caution often results in diluted messaging and reduced impact.

Moreover, Jordanian CSOs have increasingly t**urned to international actors for support** in navigating domestic restrictions. By collaborating with embassies, donor governments and international organizations, they can strengthen their position and advocate for policy changes at both the national and international levels. For example, some organizations have successfully used international platforms like the HRC's Universal Periodic Review (UPR) process to highlight restrictions on civic space in Jordan and push for changes or reforms. International engagement also provides opportunities for funding and capacity building. However, reliance on foreign funding carries its own risks. CSOs that receive funding from Western donors are often labelled as foreign agents or accused of serving foreign agendas. This not only undermines public trust but also exposes CSOs to defamation campaigns orchestrated by state actors or GONGOs.

The rise of GONGOs poses an additional challenge for independent CSOs in Jordan. These government-aligned organizations compete for international funding while promoting narratives that align with state interests. For instance, during Jordan's most recent UPR at the UN HRC, a majority of submissions came from GONGOs rather than independent civil society actors. This dynamic not only diverts resources away from genuine advocacy efforts but also skews international perceptions of civic space in Jordan. CSOs must navigate this landscape in order to find ways to distinguish themselves from GONGOs when engaging with donors and international partners.

Funding restrictions present a significant challenge for Jordanian CSOs. Under current regulations, all foreign funding must receive prior approval from the Prime Minister's Office – a process that is often lengthy and opaque. To mitigate these challenges, some organizations have diversified their funding sources by seeking support from local donors or exploring alternative financing models such as crowdfunding. According to a 2018 report by ICNL, 53% of surveyed Jordanian CSOs reported no difficulties receiving foreign funding, suggesting that diversification efforts have been somewhat successful. However, smaller organizations struggle to compete with larger entities for grants.

Egypt

Egyptian CSOs employ various adaptation strategies to navigate government-imposed 'red lines' while maintaining their operations. Many CSOs are limiting their work within the government-approved frameworks, meaning they focus on less contentious issues such as socio-economic development or service provision to align with government priorities, thereby avoiding additional scrutiny by the authorities. Some human rights organizations that remain registered under the 2019 NGO Law operate cautiously within government-approved boundaries. They carefully frame their advocacy efforts in ways that do not explicitly challenge state policies. This approach reflects what an interviewee for this study called a 'cat and mouse' game between CSOs and authorities, where organizations might exploit legal loopholes until they are closed by new regulations. Finally, a small number of CSOs have decided to operate outside the restrictive legal frameworks, choosing not to register and operating clandestinely at great personal risk. These groups face severe risks, including imprisonment of their staff.

One of the primary strategies employed by Egyptian CSOs to circumvent restrictive laws is the **adoption of alternative registration models.** Some CSOs have registered as law firms or consultancy companies rather than NGOs to avoid the stringent requirements imposed by the 2019 NGO Law. Others have sought **registration abroad** and operate in Egypt through partnerships with local entities. For example, some organizations have established sister entities in countries like France or the United States to facilitate funding and maintain operational continuity. However, this approach is not without risks, since the Egyptian government frequently uses state-controlled media to frame organizations

registered abroad as foreign agents working against national interests. This narrative feeds into public mistrust and exposes affected CSOs to further scrutiny and defamation campaigns. Moreover, dual registration has become increasingly difficult under the new legal framework, which prohibits such arrangements outright. These challenges highlight the precarious nature of alternative registration models as a long-term solution.

The **relocation of staff** has become a critical survival strategy for many Egyptian CSOs whose staff are facing threats of imprisonment or harassment. Organizations have relocated key personnel to ensure their safety. For instance, CSOs like the Arabic Network for Human Rights Information have moved their operations entirely abroad to escape repressive laws and persecution in Egypt. Such relocation processes are fraught with logistical and emotional challenges for CSOs and their staff. They disrupt organizational operations and reinforce the 'brain drain', as experienced professionals leave the country or consider changing their line of work. As a result of the continuous repression and defamation campaigns against CSOs, recruiting new staff becomes increasingly difficult due to the associated risks. This dynamic has led to a significant loss of institutional knowledge and capacity within Egypt's civil society sector.

Despite judicial bias favouring state interests, Egyptian CSOs have pursued **legal challenges against restrictive measures** such as travel bans, asset freezes and organizational suspensions. High-profile cases like 'Case 173', also known as the 'foreign funding case', illustrate the ongoing legal battles faced by many organizations in Egypt. This case has targeted numerous NGOs since 2011, accusing them of receiving illegal foreign funds to destabilize the country. While litigation efforts have achieved limited success due to systemic judicial co-optation by the regime, they remain an important tool for raising awareness about government repression targeting CSOs. For example, legal challenges against the suspension of prominent organizations like the Nadeem Center for Rehabilitation of Victims of Violence have drawn international attention to Egypt's shrinking civic space.

Given the prevalence of surveillance and digital harassment in Egypt, **digital security training** has become a cornerstone of organizational resilience for CSOs. Staff are trained in secure communication methods and data protection protocols to safeguard sensitive information from state monitoring or hacking attempts. Women journalists and activists are particularly vulnerable to online harassment, making digital security measures even more critical for this group. Organizations also adopt strict internal protocols, such as clean desk policies and encrypted communication tools, to minimize risks associated with physical raids or digital breaches.

International advocacy remains one of the most effective tools for Egyptian CSOs to counter domestic repression. Collaborating with UN bodies, donor governments and international human rights organizations allows them to amplify their voices on global platforms and put pressure on Egyptian authorities to reverse restrictive policies. For instance, diplomatic pressure from international actors has played a role in partially mitigating some restrictions under Case 173. Similarly, collaboration with foreign governments has helped secure funding for specific projects, despite domestic barriers. However, reliance on international advocacy carries its own risks. Organizations that engage with foreign actors are often labelled as traitors or foreign agents by state-controlled media – a narrative that undermines their credibility domestically.

Lebanon

The ongoing financial crisis in Lebanon has severely disrupted the banking system, making it nearly impossible for CSOs to access funds or conduct transactions reliably. To circumvent these restrictions, many organizations have sought **registration abroad** in countries like Turkey, Cyprus or France. This strategy enables them to open foreign bank accounts, access international funding more reliably and bypass local financial controls that have jeopardized domestic operations. For instance, the Samir

Khalil Foundation registered in the United States to ensure financial stability during Lebanon's banking crisis. This move allowed the organization to pay staff salaries in advance and maintain operational continuity, despite local banking withdrawal limits.

While registering abroad offers a practical solution to financial barriers, it also presents challenges. International registration can be administratively burdensome and expensive, requiring compliance with foreign regulations that may not align with an organization's existing structure. Additionally, the reliance on foreign registration risks feeding into narratives that portray CSOs and their staff as foreign agents.

Lebanon's volatile political and economic environment has made the **relocation of staff** a necessary strategy for many CSOs. Both internal and external relocation are employed to ensure the safety of personnel during periods of heightened conflict. For example, some CSOs have relocated staff within Lebanon to safer regions or moved key personnel abroad to maintain operational continuity when conditions become untenable, such as through domestic relocation due to conflict. Relocation is particularly critical for organizations working on politically sensitive issues such as human rights or LGBTIQ+ advocacy, which often face harassment or threats from state and non-state actors. However, this strategy is not without its drawbacks. Relocating staff disrupts organizational operations and contributes to a 'brain drain', as experienced professionals leave the country.

In response to increasing surveillance and digital threats, Lebanese CSOs have prioritized **digital security training** for their staff. Organizations interviewed for this study provide regular digital security workshops alongside individual training sessions with security experts. These initiatives equip staff with the tools needed to protect sensitive information from hacking attempts or unauthorized access. Digital security measures are particularly important for organizations conducting field research or working on contentious issues that attract scrutiny from authorities or political factions. In addition to digital security training, some organizations also offer first aid training in collaboration with the Lebanese Red Cross and provide safety kits for field researchers. These comprehensive risk management strategies underscore the importance of safeguarding both physical and digital assets in an increasingly hostile environment.

The economic crisis in Lebanon has forced CSOs to adopt **flexible operational models** to navigate inflation, banking restrictions and fluctuating exchange rates. Many organizations now keep higher amounts of cash on hand to ensure they can make payments even when banking systems fail. This approach allows them to circumvent withdrawal limits imposed by local banks while maintaining continuity in project implementation. Flexibility also extends to how CSOs plan and execute their activities. For instance, some organizations have shifted their focus toward less resource-intensive initiatives or prioritized projects that align closely with donor priorities, without compromising their core missions. This adaptability enables them to continue serving communities, despite severe financial constraints.

Diversifying funding sources has become a cornerstone of financial resilience for Lebanese CSOs. By seeking support from different sources – including international, state-affiliated and UN donors, as well as private foundations and local contributors – organizations reduce their reliance on any single funding stream. However, diversifying funding sources is not without challenges. Smaller organizations often struggle to compete with larger international NGOs for grants, while public misconceptions about foreign funding fuel mistrust toward CSOs. Moreover, given the recent US and European cuts to democracy and civil society support globally, as well as cuts to development cooperation budgets, the competition for limited international funding possibilities is becoming increasingly difficult.
In an environment where traditional media often fails to amplify civil society voices effectively, Lebanese

CSOs have **turned to social media platforms as alternative advocacy tools.** Social media provides a cost-effective way for CSOs to engage with broader audiences, mobilize support for campaigns and raise awareness about critical issues such as corruption or human rights abuses. However, reliance on digital platforms also exposes organizations to risks such as cyberattacks or online harassment – further underscoring the importance of robust digital security measures.

Conclusion

The shrinking civic space in the WANA countries investigated in this study poses grave challenges to CSOs, particularly those working on politically sensitive issues such as human rights and migrant rights. Across Tunisia, Jordan, Iraq, Egypt and Lebanon, authoritarian regimes have employed a range of repressive measures –including restrictive laws, financial barriers, surveillance, defamation campaigns, direct harassment and arrests – to stifle criticism and curtail the activities of independent civil society actors. These measures not only undermine democratic principles but also threaten the essential role of CSOs in advocating for the rights of marginalized or disadvantaged communities, as well as promoting government accountability.

Despite these challenges, CSOs in the WANA region have demonstrated remarkable resilience by adopting innovative strategies to sustain their operations. This research has explored these strategies in detail through country-specific case studies, offering insights into how organizations navigate hostile environments while continuing their vital work. The following sections provide a summarized overview of the mitigation strategies employed by CSOs across the countries reviewed and propose recommendations for donors and international actors on how to effectively support civil society in their struggle to maintaining open civic spaces. Ultimately, supporting CSOs in restrictive environments requires not only local adaptation but also robust international support that prioritizes long-term capacity building over short-term project funding, and puts flexible and needs-based approaches at the centre of its efforts.

Mitigation strategies across Jordan, Lebanon, Tunisia, Egypt and Iraq

Registration abroad or alternative registration

In response to restrictive legal frameworks that limit their ability to register or operate domestically, many CSOs have sought registration abroad or adopted alternative legal structures. For example, Lebanese organizations often register in countries like Turkey or France to ensure financial stability amidst Lebanon's banking crises. Similarly, Egyptian CSOs register as law firms or consultancies to bypass the stringent requirements of the 2019 NGO Law. While these strategies provide temporary relief, they also expose organizations to accusations of foreign interference and complicate their relationships with local stakeholders.

Relocating staff

Relocating staff domestically or internationally has become a critical safety measure for many CSOs facing threats of imprisonment or harassment for their staff. In Iraq and Egypt, relocation is often necessary to protect staff working on politically sensitive topics such as gender equality or anti-corruption issues. In Lebanon, many CSO staffers relocated from Beirut to more rural areas away from the border of the country during Israel's attacks to avoid being victims to airstrikes. However, this strategy disrupts organizational operations and over time also contributes to a 'brain drain', thereby weakening institutional capacity amongst civil society actors in the region.

Digital security enhancements

Given the prevalence of surveillance across the region, digital security training has become a cornerstone of organizational resilience. CSOs in countries like Lebanon and Tunisia prioritize equipping their staff with tools to safeguard sensitive data and communication channels. This includes annual training sessions on secure communication methods and risk management strategies tailored to local contexts.

Self-censorship

To avoid government pushback, many organizations engage in self-censorship by refraining from addressing contentious issues such as LGBTIQ+ rights or other politically contentious issues. While this strategy reduces immediate risks, it also limits the ability of CSOs to advocate effectively for marginalized communities and address injustices.

Limiting public visibility

To minimize exposure while maintaining stakeholder engagement, many CSOs shift their activities online or hold more closed and less public events. This strategy is particularly prevalent in Egypt, Tunisia and Iraq, where public visibility often invites scrutiny or harassment from authorities.

Engagement with international actors

International advocacy remains one of the most effective tools to counter domestic repression. CSOs collaborate with UN bodies, donor governments and international human rights organizations to amplify their voices. For instance, Iraqi organizations have successfully used diplomatic pressure to reverse restrictive policies such as bans on higher education cooperation with CSOs. However, reliance on international actors carries risks of being labelled as foreign agents by state-controlled media.

Diversification of funding

Financial sustainability is a major challenge for CSOs operating under restrictive environments. Organizations across the region emphasize diversifying their funding sources by seeking support from different donors – including international donors, foundations and local contributors. However, navigating complex donor requirements remains a significant barrier for smaller organizations.

Risk management training and capacity building

Regular training on legal rights, personal safety protocols and first aid equips staff to handle emergencies effectively. In Lebanon, some organizations provide comprehensive risk management training conducted in collaboration with the Lebanese Red Cross. In Tunisia, CSOs have invested in their own legal capacities by growing their legal departments to address the increasing oversight and potential restrictions.

Legal litigation

Some organizations pursue legal challenges against restrictive measures such as travel bans or asset freezes, despite limited success due to judicial bias. For example, Egyptian CSOs have filed lawsuits against provisions of the 2019 NGO Law while simultaneously engaging in international advocacy to highlight these issues.

Recommendations for donors and international actors

Across the WANA region, the funding landscape for CSOs has become increasingly restrictive. The dismantling of USAID,[39] coupled with substantial cuts to development aid by European states (the Netherlands, Germany and the United Kingdom, amongst others), has created a crisis for many local CSOs reliant on international support.[40] The cumulative effect of these policy shifts by major donors creates a precarious situation for CSOs in the WANA region, limiting their ability to conduct their pivotal work in providing essential services for vulnerable groups, advocate for human rights and maintain operational continuity in increasingly hostile environments.

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New funding restrictions and administrative barriers imposed by donor countries in their development cooperation, humanitarian aid and project funding practices create significant challenges for CSOs in the WANA region. Some donor countries have implemented policies that restrict funding based on political considerations or positions that may be controversial in the donor country's context. For example, some Egyptian, Jordanian and Tunisian CSOs have been excluded from receiving German and US funding due to statements made by their leadership or staff regarding Israel's conduct of the war in Gaza. [41]

To sustain civil society in the WANA region's restrictive environments requires robust international support that prioritizes long-term capacity building over short-term project funding. The following recommendations outline how donors can better support CSOs in maintaining open civic spaces:

1. **More flexible funding mechanisms:** Develop unbureaucratic short-term funding lines and grants for CSOs working in contexts of shrinking civic space, and provide more long-term non-project–related funding programmes that allow CSOs to better adjust and adapt to the rapidly changing contexts they face. Donors should increase non-project–related funding and temporally unrestricted partnerships or grants that allow CSOs to adapt to changing political circumstances rather than tying funding to rigid project-based outcomes. Moreover, donors should encourage a diversity of opinions amongst the funded CSOs and not base the selection criteria for funding of partners on political statements by their personnel, but rather on the work of the organizations and the donors' foreign policy objectives.

2. **Establish emergency response mechanisms:** Establish rapid response funds for CSOs facing immediate threats or crises to relocate staff or cover legal fees. Donors could develop specific funding lines for CSOs in countries that are witnessing a closure of civic space so that they can offer grants to CSOs within a short timeframe, to allow CSOs to continue their work when targeted.

3. **Invest in capacity building:** Investments in regional capacity-building programmes – such as training on digital security, financial management, crisis response, advocacy strategies, and support or best practice networks between CSOs from different sectors – can enhance organizational resilience against external pressures.

4. **Increase diplomatic pressure:** Donor governments should leverage diplomatic channels to hold authoritarian and repressive regimes accountable for violating international human rights standards, while also advocating for greater protections for civil society actors, by applying conditionality, namely personalized sanctions, to security, trade and economic cooperation if repeated violations occur.

5. **Support regional collaboration:** Supporting regional networks like the SharaKa programme can amplify collective advocacy efforts while fostering knowledge sharing among CSOs across borders. More regional networks can also make funding programmes more flexible in dealing with shrinking spaces and decouples such funding from bilateral negotiations with governments on cooperation in other fields.

6. **Support awareness campaigns:** Donors can help counter defamation campaigns against CSOs by funding public awareness initiatives that highlight the critical role of civil society in promoting accountability, social justice and services to their communities.

7. **Support diaspora organizations:** Donors should provide targeted support for exiled organizations, Human Rights Defenders (HRDs) and activists that continue their work from abroad while navigating complex legal and administrative challenges.

8. **Increase legal support:** Donors should increase funding for legal aid and strategic litigation efforts by CSOs to challenge restrictive regulation, laws and practices by authorities in the WANA region.

41 see

9. **Increase digital security investments:** Donors should prioritize funding for tools and training to protect CSOs and their staff and partners from surveillance and cyber-attacks by the authorities.

10. **Diversify regional partnerships:** Engage more directly with regional organizations and informal initiatives through embassy staff, rather than just established INGOs and German or European implementation agencies, to diversify regional partnerships.

The resilience displayed by CSOs across Tunisia, Jordan, Iraq, Egypt and Lebanon underscores their indispensable role in promoting accountability, transparency and justice in societies where these values are increasingly under siege and authoritarianism is on the rise. By leveraging adaptive strategies tailored to their unique contexts – and with robust international support –civil society actors can continue their vital work, despite mounting pressures from authoritarian regimes.

This study highlights not only the challenges faced by CSOs but also their ingenuity in overcoming them – a testament to their commitment to advancing human rights and social justice, even under the most repressive conditions. Moving forward, fostering solidarity among domestic actors while building stronger partnerships with international allies will be crucial for ensuring that civil society remains a vibrant force for change across the WANA region.

Limitations of the study

While this study provides valuable insights into how CSOs mitigate restrictions in shrinking civic spaces across Tunisia, Jordan, Iraq, Egypt and Lebanon, it is important to acknowledge its limitations. The three main limitations of the study are:

1. **Limited case study coverage:** The study focuses exclusively on five countries within the WANA region – excluding other contexts where civic space is similarly constrained (e.g. Israel, Palestine, Morocco, Algeria, Libya, Syria, Oman, Yemen or the other Gulf states). As such, its findings may not fully capture regional trends.

2. **Narrow sectoral focus:** The study primarily examines the effects of shrinking civic space in the region on human rights and migrant rights organizations, while excluding other sectors such as environmental rights groups, women's rights groups or labour unions, which also face unique challenges under shrinking civic space.

3. **Small sample size:** With only 10 interviews conducted with CSO professionals across five countries, the study's findings are based on limited information that may not reflect broader experiences within each national context.

Despite these limitations, this study serves as an important starting point for understanding how CSOs navigate shrinking civic spaces in the WANA region while distilling best practices in their mitigation efforts and offering actionable recommendations for donors seeking to support their resilience.

Appendix

Appendix 1: Questionnaire

Questionnaire for CSO actors from Tunisia, Jordan, Iraq, Egypt & Lebanon

Goals
- Mapping threats from shrinking space for CSOs in the region
- Collecting best practices and adaptation strategies of CSOs

Mapping threats from shrinking space for CSOs

How are you / your colleagues / your organisation / your partner organizations affected by shrinking space?
What are the restrictions / attacks you are facing?
Are you experiencing any of the following (if so, please describe below)?

=> persecution from law enforcement
=> attacks by religious / political actors on organisation and / or staff
=> on- or offline surveillance
=> (novel) restrictive legislation or regulations on registrations for NGOs
=> restricted access to information
=> restricting access to (foreign) funding
=> asset freezes / restrictions on spending
=> restricted access to relevant government bodies
=> travel restrictions / restrictions of partnerships with other organisations
=> event restrictions
=> research restrictions
=> dissolvement of organisations

Collecting best practices and adaptation strategies of CSOs

How does this effect your work?
What kind of measures have you undertaken to counter these restrictions and their negative implications for your organisation, its work and its staff?
Are you applying any of the following strategies (if so, please describe below)?

=> Registration abroad
=> Registration as another form of entity
=> Relocating staff
=> Limiting public outreach / visible activities / seizing to hold or participate in events
=> Diversifying funding – how exactly?
=> Legal litigation
=> Change of thematic focus regarding the work of the organisation
=> Public shaming and building coalitions condemning restrictive actors
=> Engaging international CSOs, UN or other bodies
=> Suspension of activities
=> Safety measures for staff
=> Safety measures on digital / communication security

Appendix 2: List of interviews

List of Interviewees (anonymized)

Number	Country	Sector	Gender	Location
001	Tunisia	Human rights	Female	Tunis
002	Tunisia	Migrant rights	Male	Brussels
003	Tunisia	Human rights	Female	Tunis
004	Egypt	Human rights	Male	Brussels
005	Iraq	Human rights	Male	Erbil
006	Iraq	Human rights	Male	Baghdad
007	Iraq	Human rights	Female	Berlin
008	Jordan	Human rights	Male	Amman
009	Lebanon	Migrant rights	Female	Beirut
010	Lebanon	Human rights	Female	Beirut

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