



OPERATING IN UNSETTLING TIMES: STORIES FROM CIVIL SOCIETY ORGANIZATIONS IN THE MIDDLE EAST AND NORTH AFRICA

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1. INTRODUCTION

Despite surges of hope throughout the various uprisings in the Middle East and North Africa (MENA) since the 2010s, the region is experiencing a stark deterioration in human security and human rights. Grappling with crisis, increased authoritarianism and conflict, according to the UN Human Development Index 2024 more so than anywhere else in the world, citizens in this region experience high levels of perceived human insecurity leading to a diminished sense of agency and control over their lives^[1]. At the same time, a majority of the region's states seem to be in an increasing state of fragility^[2] signalling heightened risks of violent social and political events. Amidst this, repression is increasing, civil society is under attack and civic space is in decline.

Civil Society is an essential actor in the defence of fundamental freedoms, human rights and democratic processes. Having an open civic space is the cornerstone of any functioning democracy and a prerequisite for the flourishing of human rights. Open civic space means that the political, legislative, social and economic environment in a country enables, rather than restricts, citizens in gathering to shape their societies. In the MENA region, civil society has had a long and resilient history. It can be traced back to the late Ottoman Empire^[3], where the rise of youth clubs and associations laid the groundwork for modern civic engagement. Despite enduring various challenges, these forms of associational life have persisted and remain vital in resisting contemporary political and social pressures. But the shrinking of civic space due to compounding local and international constraints has made it increasingly difficult for civil society to thrive.

A large majority of countries in the MENA region have a repressed civic space environment according to CIVICUS^[4], indicating the internal restrictions these countries face, such as detainment and prosecution of Human Rights Defenders and journalists, or restricting internet freedoms. However, what is also evident is that civil society organizations (CSOs) in the MENA are also facing international restrictions. As countries experience political and economic instability, and are subjected to economic sanctions, they are often classified by financial institutions as high-risk. This categorization leads to consequences such as increased due diligence requirements and de-risking. De-risking refers to the practice of financial institutions avoiding perceived risks, where they may close a bank account or deny transfers, or which may lead to long delays or repeated requests for information. Whereas several 'sectors' are affected by derisking for similar reasons, e.g. small and medium enterprises, donors and foundations in the MENA, our focus in this report lies on the de-risking/ debanking of the civil society sector^[5].

Growing repression and restrictions underscore the urgent need to study the shrinking of civic space in the MENA region from the perspective of the civil society organizations that are deeply affected by this. Understanding this phenomenon is essential for analyzing societal resilience in this critical part of the world, especially as



similar patterns of repression against civil society are emerging in other parts of the world. Under the Civic Horizons^[6] project, Human Security Collective (HSC) conducted an online consultation interviewing civil society organizations across Morocco, Tunisia, Libya, Iraq, Jordan and Lebanon to gain a better understanding of the (shrinking) civic space dynamics they are encountering. One of the assumptions underpinning this consultation was that different types of civil society organizations face/experience restrictions and other shrinking space dynamics in different ways and that increased solidarity between them will potentially increase their resilience and offer repertoires of action to curb this trend. To this end, we discussed with different types of organizations the various types of restrictions they experience from governments, banks and donors; their everyday experiences and practices; as well as the trends they are observing more generally. We also asked them for their thoughts on the path to resilience in the face of restrictions, many of whom emphasized the importance of trust and the role of solidarity. The results of this consultation presented in this report are merely the start of a conversation, with the phenomena reported requiring much more exploration, research and engagement. This is even more so in light of the radical changes, including in the donor landscape that have taken place over the course of this project and the fundamental impact this will have on civil society organizations worldwide.

Previous reports on the shrinking of civic space, especially in relation to countering terrorism financing, have often referred to civil society organizations' responses to restrictions in terms of "coping mechanisms", or sometimes as "adaptive measures"^[7]. These "coping mechanisms" include self-censorship and cash-carrying or other informal money transfer systems, using trust-relations, and other mechanisms. While we set out to explore further what these "coping mechanisms" for civil society organizations in the MENA region specifically entailed, it is important to note that the people we spoke to described these mechanisms differently. CSOs did not describe what they did as actively "coping" because there is no space for that, they are merely responding to restrictions; extinguishing fires and surviving on "a BBQ grill". The reality the CSOs we consulted depicted was very much formed of concurring crises and compounding restrictions leading to a state of survivalism amidst reinforced shrinking civic space. Nonetheless, within this shrinking space, and based on the insights and reflections shared by the CSOs we interviewed, we identified the various elements that can contribute to CSOs' safety and resilience and potentially offer strategic avenues of action moving forward. We elaborate on these in the last chapter.

2. METHODOLOGY

This report is based on exploratory research that seeks to illustrate the multi-faceted restrictions that CSOs in the MENA have been facing over the years and how, when taken together, they compound and create real challenges for the ability of CSOs to continue operating. To do this, the research triangulated multiple data sources from different countries in the MENA region to provide deeper insights into the broader factors that impede the work of civil society in the region. The following qualitative data was collected and fed into the report:

1. Analysis of the reports Building an enabling legal environment and Rapid Organization Assessment, conducted under the Civic Horizons project;
2. Focus group discussion with 6 civil society organizations comprising the Civic Horizons consortium;
3. Semi-structured interviews conducted with 17 civil society organizations (CSOs) and 1 network of diverse organizations. The interviews were conducted between March and July 2024.

The organizations interviewed were based in Tunisia, Jordan, Libya, Morocco, Lebanon and Iraq (countries the of Civic Horizons project was implemented in). The focus of their work spanned gender, freedom of expression/journalism, civic space, rehabilitation of torture survivors, human rights, right of minorities as well as humanitarian work. Their structures also varied: they were professional organizations, volunteer based, composed of a mixture of professional staff and volunteers, well established, emerging, youth-led, women-led, etc. We chose to interview such a diverse set of organizations in order to ensure that the consultation captured the variation in restrictions that organizations face based on the type and scope of the organization.

The sample of organizations we interviewed is relatively small and therefore we do not attempt to make bold generalizations or statistical inferences. Nonetheless, there is plenty of evidence already available showing the presence and scope of some of these challenges, which we will refer to in this report. What makes this report different from many others published on civic space issues is the fact that it centres around the experiences and analysis of local and national civil society organizations from the MENA. What this report aims to do is to illustrate how the simultaneous challenges these CSOs face have cumulative effects and how the organizations in the region are coping. The interviews we conducted detailed the issues and highlighted overlapping issues that many CSOs are facing and which we will discuss in more detail in this report.

3. WHAT DO THE STORIES TELL US ?

Civil Society Organizations describe a reality of concurring crises and compounding restrictions leading to a state of survivalism and shrinking civic space. In the following, we try to deconstruct this reality and describe each of its elements, informed by examples and experiences shared by the consulted organizations.

3.1. CONCURRING CRISES

The realities described by the people and CSOs interviewed reflects the compounding effects of the COVID-19 crisis, economic and financial crises, access to liquidity, dollarized economies and inflation, and the descent into autocracy. They also spoke about everyday challenges dealing with militias controlling delineated regions, cycles of violence, the rise of ISIS and the war against it, the Gaza genocide and the Russia-Ukraine war, the last of which has led to shifting funder's priorities and a decrease in funding for the MENA region. One of the Iraqi organizations described the challenges as ongoing: "the problem is that they are daily. Every day there is a new challenge^[8]." Meanwhile, a Lebanese respondent shared the following: "Complications are not something that we're not used to in Lebanon. [...] You wake up in the morning and you might not have water, you might not have electricity. So it's more or less our daily bread and in Lebanon it's the way things work. [...] You need to do everything on your own and you need to fill the gaps that are existing in the country on your own. Of course when you have ambiguity and you don't have clarity on what's happening, tensions will rise among the team^[9]."

It is impossible to dissociate the conditions of civil society organizations from the context they operate and live in. When war erupts in a country, in the case where civil society workers and volunteers are (relatively) safe and able to stay, the war changes the priorities of the organization and the CSO's earlier elaborated plans might no longer be relevant. The operations of the organization are either shifted towards humanitarian work, responding to immediate needs and threats or they are stopped. One of the Lebanese organizations shared that there are a lot of things they always have to consider. This takes time and energy away from the actual implementation of projects. Additionally, they have to ensure security of their staff, "because since 2005 I can't remember when Lebanon was a peaceful country"^[10]. In other cases, such as the experience of one Libyan organization, civil society actors are pulled into the war dynamics, join one of the warring parties and actively take part in violent narratives whereby cooperation becomes impossible^[11].



In the context of political instability that has not descended into a full-fledged war, things are more ambiguous, and full of risk. Describing the hurdles they experience, Libyan civil society organizations recounted how the political instability leads to reluctance by donors to fund projects in the country^[12], how the divide between the East and West of Libya led to two separate governments as well as two different institutions in charge of regulating civil society, creating unclarity for organizations operating in the South of Libya especially over what rules to follow. One of the Libyan organizations described it in the following terms: “You never know what you will be arrested for. This is always on our minds^[13]”. Compounded by a continuous state of risk, this has transformed every decision into a nerve-racking and draining exercise^[14]. Additionally in contexts of political instability or authoritarianism, there tends to be quick changes of who is in power resulting in changes and transfers of people working at senior levels of state institutions. The relationships organizations have built over a long period in order to enable their work are lost. They have to be built anew, and in some cases this is not at all possible because of high turnover.

People we spoke to who worked and volunteered at various civil society organizations described the challenges they faced as an everyday occurrence. Everyday practices expected from organizations by various actors, including banks, donors, and government institutions, were becoming logistical nightmares in the context of concurring crises. The people and CSOs we interviewed are incessantly required to come up with solutions that may or may not fall within the framework of a given grant and that is effort consuming and need to be resolved at the expense of the implementation timeline. The psychological toll is considerable: it is exhausting, and affects the personal lives of people active in human rights organizations^[15]. Civil society workers in countries that were.

facing financial crises were especially confronted with challenges in implementing their projects. For example in Lebanon crises have been successive: the economic and financial crisis, rocketing fuel prices, and sanctions which have contributed to a downgrading of the banking sector, etc. The organization we spoke with described the effect of the downgrading of the banking system on their work which meant they needed to justify every dollar they received. This led to 3 months of delays in the implementation of their projects, which in turn affected their relationship with their partners. And various staff members were under pressure to deal with the bank, the partners, the donor, etc.^[16] The dollarized economies in Lebanon and Iraq and black market currency exchange rates and liquidity crisis in Libya created another set of challenges organizations needed to deal with.

In Iraq, one organization resorted to transporting cash rather than making bank transfers. Libyan organizations resorted to opening bank accounts in Tunisia^[17]. One Iraqi organization shared that the grants they receive are in US dollars or in euro. This leads to a loss in budget which in turn the organizations are expected to account for and resolve^[18]. In sum, the reality of CSOs in these contexts is best described as a constant exercise of extinguishing fires.

3.2. COMPOUNDING RESTRICTIONS

In addition to the macro-level crises faced by communities and CSOs mentioned in the previous section, CSOs worldwide are also facing structural access issues from some of their most crucial stakeholders, including government regulators, banks and donors, which further impact their ability to carry out their mandates.

3.2.1. GOVERNMENT

Repression takes various forms, some of it extremely overt such as the detaining of human rights defenders and journalists, and censorship. Some other forms, such as onerous reporting or registration requirements, may seem more administrative in nature but can often have equally disastrous impacts on the ability of a group of people to organize under a common goal. The justifications for these laws are often security-based, either to prevent/counter terrorism (financing), to counter corruption or unwanted foreign influence. The Financial Action Task Force, which sets standards for governments to follow on how to best prevent terrorism financing and money laundering, have openly acknowledged the misuse of these justifications by governments. They acknowledge that some governments misuse counterterrorism financing and anti-money laundering measures in order to clamp down on civil society they do not approve of, often impacting human rights organizations^[19]. We have also seen many trends in policies being adopted by governments to restrict civic space such as limits or bans on foreign funding, burdensome registration and reporting requirements, limits on the types of works that CSOs can engage in, among others.

In the countries covered under the Civic Horizons project, we have seen that civic spaces that were once open are closed again. It leads to unclarity, threats, imprisonment, and risks for civil society organizations and especially human rights organizations tackling “hot issues”^[20]. From previous research we know that not all organizations are impacted in the same way. Smaller, grassroots organizations working on topics that threaten the established power structures or that are critical of the government are more often targeted. We see that dynamic exemplified in Iraq, where one respondent noted that organizations working on human rights have a harder time getting registered than those



who work on less political topics: “it took 9 months to register [our HR organization], others it takes 25 days”^[21]. In Lebanon, which has a refugee population of over 1.5 million, the issue of refugee rights and care is a politically fraught one and organizations working to serve these populations face a lot of pressures. According to one respondent “the government considers that any local NGO that is working with the refugees is actually helping the refugees to remain in Lebanon and is working against the policy of the government to make refugees leave Lebanon [so] the government targets organizations working with/on refugee issues” ^[22]. These organizations have faced army raids on their work locations, direct attacks in the media and restrictions to access areas such as refugee settlements, all of which requires care to navigate and contributes to a tense relationship with

government officials. Across the focus countries, many organizations have flagged facing issues when working on gender or LGBTQI+ issues, “when we use the word gender, we have to be careful”^[23]. In Iraq, the anti-gender law bans any organization that promotes what conservative politicians defined as “sexual deviancy,” imposing a prison sentence of at least seven years and a fine of no less than 10 million dinars (about USD7,600). In Libya, many organizations are repeatedly required to register their organization, which puts a target on the backs of many organizations that are working on issues like gender, migration or human rights^[24]. One of the Libyan organizations described the increasing risks when working on political issues or women’s rights. And the risks emanate from state institutions, fundamentalist extremist factions in government and/or armed groups. In fact, this organization denoted that what civil society is facing extends beyond shrinking civic space. It is a rise of authoritarianism characterized by military and extreme religious fractions forming alliances rather than being in conflict such as was the case in the 80s and 90s^[25]. Additionally, according to this Libyan and a Tunisian organization, the different governments are also learning from each other, helping each other with surveillance and communicating extensively with each other^[26].

Respondents reported experiencing challenges navigating the government registration and permit process and that it impacts their ability to do their work. Some examples include challenges in receiving the required local permissions for implementing their activities and receiving foreign funding. In Jordan, for example, respondents have noted that approval for a CSO receiving foreign funding can take months and is sometimes also made conditional on government ministries supervising the implementation of activities, which can create real challenges for the independence of civil society^[27]. Respondents from Jordan also reported that internal governance changes such as that of administrative bodies and commissions within the organizationers are subject to approvals by the government (security and administrative), which can be time consuming ^[28].

There is also influence exerted by authorities on the types of work that is approved. In Iraq, for example, different regions have different procedures to obtain approval, and what is considered normal CSO work in one region is not allowed without explicit approval from the local government in another, at times even going as far as to require approval of the activity list^[29]. In another example from Iraq, “if you want to conduct training for a group of people in a certain governorate in Iraq [on human rights], you will surely face rejection from the local administration in the neighbourhood or region, and they will obstruct approvals to carry out activities”^[30]. This same respondent mentioned that on average they receive between 20-30 comments on their proposals submitted to the government, which they have to answer and resolve before being able to gain permissions from the local administration for their events. In terms of coping mechanisms, some organizations highlight feeling like they are walking a thin line, where they are sometimes able to use social media and other pressures to convince the government to change their position but also have to be extremely careful not to openly criticize so as not to put a bigger target on their backs or cause more retaliation^[31].

3.2.2. BANKS

Financial access issues for civil society organizations worldwide have been widely documented and well established. Organizations have faced a slew of financial access issues such as closure of bank accounts, denial or extreme delays in opening a bank account, denial or extreme delays in the transfer of funds, limits on how funds can be withdrawn, multiple and onerous requests for information and more. Banks, on their end, have various pressures that have led to this outcome. They have to comply with national law, sanctions and international banking standards, and they are weary of the wrath of and fines from their regulator. In some countries, banks have a very close relationship with intelligence and government. One other important component is that banks are for-profit entities, for whom CSO clients are largely low-profit and high risk. In contexts where there are less and less correspondent banks, there are also more gaps and less banks willing to fill those in “high-risk” jurisdictions, leaving many CSOs to use money transfer services like Western Union, money value transfer services (hawala) or cash, the former of which is expensive and the latter two of which are not ideal from a financial integrity perspective. Carrying cash also endangers CSO staff.

In Iraq, one respondent noted that the process of opening an account is a complex financial process and “not easy because the banks will ask for the organization’s papers, certificate, and a set of details and they will ask for financial statements and so on. In addition, a large part of the banks ask that the organization’s papers themselves be certified by the Organizations Department. The certification process sometimes takes three months, in addition to the process of verifying the transfers.

All transfers are delayed. For example, if the transfer usually takes from two to three weeks, it takes 45 or 60 days depending on the country it is sent from, in addition to the verification by the Central Bank to transfer to other banks. One of the largest banks in Iraq is mixed, partly governmental and partly private. It takes 5% of the transfer commission, and this 5% of large amounts will be borne by the organization and not the donor.”^[32]

For civil society organizations it is incredibly challenging to navigate this uncertain and unpredictable financial landscape. It can cause delays and work stoppages and can put them in very dangerous situations when they have made financial commitments that they cannot comply with due to these delays or transfer issues. One organization based in Iraq noted that due to not being able to transfer funds they “were obliged to send part of the money from the donor by land directly in cash, dividing the amount into parts”^[33]. This brings with it obvious security risks for the individuals carrying the cash, but also for the work being done by the organizations.

Denial of transfers can also be costly, “twice [an amount] was transferred and the transfer fees were deducted, and then the money [was] returned and we were not able to take it. Organizations currently cannot receive money in American currency from abroad, and sometimes we are forced to receive money in cash directly from people”^[34]. Between the additional costs for transfer fees, the discrepancies between the central bank dollar rates and black market dollar rates, the administrative fees paid by organizations to the staff that is working to comply with these rules, the liquidity problems and the costs created by delays, it becomes clear that financial access issues faced by civil society organizations in many of these contexts go well beyond being a nuisance and put their very ability to do their work in jeopardy.

In Lebanon the financial crisis has exacerbated the banking issues faced by CSOs, “because of the downgrading that happened to the banking system every dollar received in the organization's bank account needs to be justified (where it's coming from, what's the reason, how it's going to be used) [...] This has been the case for big amounts since the beginning of the crisis. But now it is also required for very small amounts - donations received from individuals via PayPal, credit cards, etc. This is a hassle”^[35]. This leads to the blocking of operations and delays project implementation. This organization copes with this by having one staff member completely dedicated to corresponding with the banks, which is also costly and diverts funds that could otherwise be used for project purposes.

In Tunisia and Jordan organizations^[36] have flagged issues around repeated requests for information by banks, with unclear and changing procedures. In Iraq, the relationships between the banks and the authorities also complicate matters, “banks link their relationship with the associations to the associations' relationship with the authorities”^[37].

3.2.3. DONORS

In the discussions we held with interviewed CSOs, a great majority refer to the more traditional type of donors: Ministries of Foreign Affairs and embassies of the Global North, as well as various types of international organizations and agencies (United Nations (UN), Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), International Non-Governmental Organizations (INGOs), etc) that operate as intermediary funders. These institutions are increasingly under pressure by various critical discourses and public debates; whether those concerned with anti-colonialism or the supremacy of national interests of Global North countries in development cooperation. More recently, the second seems to have the upper hand. Civil servants and staff active within these institutions are required to showcase high impact on achieving agendas serving national interests, faring away from risks and focusing on immediate 'gains'. But at what cost?

Civil society organizations perceive donors as allies and enablers of civil society. Yet, the organizations we spoke with also described experiencing restrictions from donors and/or intermediary funders. They experienced these restrictions at the following levels:

3.2.3.1. INCREASING DONOR REQUIREMENTS AND PROCEDURES

With great unease and caution some of the organizations we spoke with raised the issue of heavy burdensome and time consuming procedures. These procedures are the mModus Operandi of donors, put in place installed to serve the interests of transparency and accountability. Albeit expressing their commitment to the rules of transparency and accountability, some CSOs do denote that these called out these procedures asre being burdensome and onlyincreasing over time. As one of the Tunisian civil society organizations underlined: collaborating with a specific donor over time, they noticed the an increase in procedures being required. Challenges experienced under a previous implementation phase were quickly translated into additional procedures under a new phase. They weare mainly financial in nature and required a lot of the finance team's time^[38]. A similar trend was observed by organizations in Iraq and in Jordan^[39] who stressed especially that the documentation they need to provide donors is "increasingly more detailed^[40]" and "too much^[41]". The Jordanian organization stressed experiencing the heavy toll of documentation required as a restriction, especially as the detailed documentation was followed by a donor.

Visiting the CSOs office and counting the pens in order to check whether these corresponded with the details in the invoice^[42]. This creates an environment of distrust and a sense of rigidity from the donor while organizations need to adapt to the challenging and ever evolving contexts they operate in. Meanwhile some of the CSOs also raised questions about whether all the requirements and procedures truly emanated from the donor or rather from intermediary donors

who want to avoid any risk in terms of compliance with donor requirements and become very rigid towards their partners^[43]. This has also been documented by other reports and articles, outlining the downstreaming of risk to partners on the ground, especially through elaborate contracts from donors and intermediate donors which set out onerous and disproportionate due diligence and reporting requirements that must be complied with regardless of the context. There is no 'zero-risk' situation, and the risk needs to be shared by all and not downstreamed to apply to only the partner on the ground.

In order to cope with this, organizations negotiate with donors. But this is only possible in a few cases, depending on the framework of the funding, whether the organization is in a direct relationship with the donor and whether the established relationship is a trusting one that is open and relatively equal. Meanwhile, an Iraqi organization explained that these procedures are necessarily translated into various and/or multiple documents and verifications that are not only applicable to the CSO but also to the "beneficiaries" and the suppliers who are less understanding of the insensitivities of some of these multiple checks. As such this consulted CSO shared that in some instances donor requirements and procedures required multiple and repetitive verifications of personal information of "beneficiaries". The "beneficiaries" interpreted this as the organization distrusting them, checking on them and controlling them. Eventually this harmed the organization's relationship with the community and undermined its very purpose and work^[44]. What this means in practice is that CSOs are juggling between on the one hand ever increasing burdensome practices and standards, including transparency and accountability, which are oftentimes not contextualized, unquestioned and for many CSOs hard to discuss in what is an unequal power relation. And on the other hand there are the complications of a reality created out of concurrent crises and increasing restrictions from governments and banks.

3.2.3.2. EXCLUSIONARY PROCESSES AND SHIFTING PRIORITIES

Other restrictions described by the CSOs we interviewed are best understood under a common denominator of 'exclusionary processes': mechanisms installed by donors topped up by complex realities of crises and government and/or bank restrictions which lead to the exclusion of small and/or local civil society organizations from funding opportunities. If de-contextualized, some of these mechanisms seem very reasonable. But once placed in the specific contexts and under the conditions these CSOs perform, they become unattainable. For instance, one of the Lebanese organizations explained that "certain grants are done to empower smaller CSOs and grassroots organizations, but the requirements need them to be registered which is not possible given the legal situation in Lebanon. It takes one to two years to do so"^[45]. In view of the reality of the challenges CSOs face, one of the Jordanian organizations stated experiencing donor's request to co-fund projects for up to 20% as disabling^[46]. Iraqi, Libyan, Tunisian and Jordanian organizations also mentioned proposal writing as a barrier.

These often need to be written in another foreign language (usually English or French) which they might not excel in, and are a way of evaluating CSOs that does not necessarily reflect or reward the organizations' capacity to do a good job in the field^[47]. Intertwining with the exclusionary processes is another restriction which was mentioned by the CSOs we interviewed, namely: shifting donor priorities. In the aftermath of the Arab Spring in 2011, large amounts of funding were available to work on freedom of expression and human rights more generally. But as one of the respondents in Jordan stated, in 2014 donor priorities shifted^[48]. Across Morocco, Iraq and Jordan, we spoke with CSOs that focus on freedom of expression and are working with journalists. They all described similar experiences: when freedom of expression in the MENA was a donor priority, their CSOs developed and flourished. Then donor priorities shifted and they found themselves struggling to survive and implement projects. Eventually these freedom of expression CSOs transformed into voluntary based organizations sustained through the efforts of a few people. Meanwhile, CSOs we consulted, especially in Libya and Iraq, describe observing how over time, it was the organizations that focused and adapted to the needs and priorities of donors who flourished. These organizations were characterized by their management capacities, and had all the donor required procedures in place. They worked moving from one theme to another, depending on what donors needed and defined as priorities, building their track record, and their capacity to manage ever increasing budgets, and eventually became "preferred partners"^[49].

The problems this raises is manifold. It stifles the independence of civil society whereby it lends credence to the anti-civil society narratives accusing CSOs of serving agendas of foreign powers which increases the distrust with communities. Furthermore, the processes designed by donor governments to ensure accountability and transparency to their publics are translated in upstream accountability by CSOs to donors in the realities of many of the countries under scope here, leaving limited consideration for downstream accountability. And especially in the current political climate where development and cooperation policies seem to be increasingly defined by donor countries own interests, the question we need to ask is if and how solidarity between citizens in richer countries with citizens elsewhere need to be (re)shaped, with the aim to generate political will for a reimagination of international cooperation.

Looking at who is funded and supported, the experiences shared by respondents highlighted two trends: established funding mechanisms and requirements exclude small grassroot CSOs as well as newly established CSOs who are led by youth (at least in the context of the interviews we held). They hit a glass ceiling and are crippled in their capacity to implement larger funds. This was an issue especially denoted by respondents in Libya and Iraq^[50]. At the same time, the organizations we spoke with, who are all national and local organizations, described that



INGOs registering in MENA countries are receiving a big part of the funds in the country, directly competing with the national and local organizations, and ultimately undermining and weakening the country's civil society^[51]. Paradoxically one of the respondents also mentioned that their organization resorts to partnerships with INGOs registering locally in order to deal with the burdensome requirements and procedures posed by donors. In the respondent's terms, these INGOs create a "buffer" between them and the requirements by the donor. Even though this offers a way to deal with some of the challenges faced by CSOs, this is a short-term remedy that helps maintain problematic underlying mechanisms in the long term, such as impeding the localization agenda.

An observation that was also shared by respondents in Libya, Jordan and Iraq, is the developing tendency of donors to work with organizations that do have good relationships with the government, in what one can assume is an attempt to avoid crisis and ensure the implementation of projects^[52]. This tendency only helps to strengthen the restrictions imposed on CSOs in repressed and closed civic spaces. Repressed by their states and shielded away from by donors and INGOs, activist and critical civil society organizations are increasingly excluded from opportunities to see their work funded and the possibility to perform their mandates, while Governmental NGOs (GONGOs) and CSOs who join the ranks are strengthened.

Dynamics and processes with similar impact have also been observed in the aftermath of the war on Gaza. While a large majority of the CSOs we consulted were struggling to deal with the abovementioned restrictions, the Gaza war began. Organizations in Jordan and Lebanon but also in Palestine and all over the MENA region more generally (according to respondents), found themselves in a position where they needed to choose between their belief in the need to condemn the war and atrocities perpetrated against the Palestinians and avoiding donor cuts over expressed support for Palestinians^[53]. The stories they shared demonstrate that some donors actively restricted CSOs' freedom of expression. Many respondents described the dilemmas they themselves and other organizations around them went through: needing to choose between their mandate to defend international human rights and humanitarian law and the pressure to secure staff's livelihood and sustain the organization. And facing these dilemmas, some CSOs chose the latter. Subdued, they were able to care for the livelihood of the people in their organization and sustain their organization. But this laid a precedent. And in various ways, the process this creates is that of the conditioning of civil society into compliance with government and donor interests. The result in the long term is the likely risk that critical organized human rights CSOs will cease to exist in the way we know it now.

Furthermore, in the aftermath of the 7th of October 2023, many civil society organizations and especially human rights organizations in the MENA region found themselves standing on opposite sides of some of their funders and INGO partners over their stances on the War on Gaza and the unfolding genocide. A respondent from Lebanon shared the double standard in the way donors and INGOs managed their relationship with vocal CSOs vs those that kept quiet. What was a clear a human rights and humanitarian law issue became political. And in these circumstances, aid was also politicized: funders, especially German ones, halted funding of organizations that signed statements or expressed support for Palestine^[54]. It was a shock-wave through civil society in many countries across the MENA. In Jordan, the CSOs we interviewed were very much aware of the issues of conditional funding and placed it in the context of the war on terrorism. In this context, definitions of terrorism are very much political and differ from one country to another and one donor to another. Ultimately, the politicization of aid begs the question: what is the nature of this monetary relationship? Is it a right CSOs are entitled to? Is it a privilege CSOs on the receiving end should be grateful for? Meanwhile, foreign policy and international aid policy has always been tied to (donor countries) domestic policy and politics.

3.3. STATE OF SURVIVALISM

Dealing with the abovementioned concurring crises and compounding restrictions, organizations shared that “the coping mechanism is to look for different solutions, and each country has its own restrictions and solutions”^[55]. They shared that “it is a day to day basis of coping mechanisms with no clear answer. New obstacles emerge on a daily basis”^[56]. Even though this testifies to a great deal of resilience and creativity, it also denotes that organizations are actually responding rather than proactively coping with the situation. Therefore some of the organizations we consulted termed this a state of survivalism. It was captured by one of the Libyan organizations as follows: “We are constantly on this barbecue grill. You don't know what will catch fire. So you have to react to things coming up, but that means that you are never addressing the root issues, you are stretched thin, you don't have resources and it's difficult”^[57]. This state of survivalism is characterized by the following intertwining and mutually reinforcing dynamics:

- CSOs react to unfolding events, feeling overburdened, hit from every corner and unable to envision a strategy that is able to proactively address root causes, and contribute to the defence of human rights.
- CSOs seek to enable the continuation of their organization and by consequence their work. Therefore, civil society organizations are continuously seeking funds, whereby donors have the power to set the agenda and priorities the projects shall address.



Organizations we consulted describe a praxis of CSOs ticking donor's boxes, "accommodating donors and not the community"^[58]. According to one of the Libyan organisations, Libyan CSOs are "implementing projects set by agendas that European capitals set in terms of priority and it has always been massively humanitarian and migration as in migration control. [...] It has created a Libyan civil society mentality where CSOs are not thinking about a strategy of their own or addressing national or local issues. There are no plans for how we tackle a lot of the challenges that Libyans face because everyone is implementing projects for the UN or for bigger organizations or the USA or..."^[59]. To one of the Lebanese CSOs, the priorities set by donors are "serving a geopolitical agenda" and the gap between their agendas and the needs of people on the ground is doing harm. As such, in Lebanon which is crippled by crisis, projects are funded to support refugee communities while "the host communities are more or less desperate: they go knock on doors and they don't get any help from the NGOs"^[60]. This ends up further fuelling tensions between Lebanese and Syrian refugees.

According to the stories shared by the CSOs this feeds into a disruption of the relations between civil society organizations and the society/ community they are meant to serve. One Libyan organization described it in the following terms: "By 2016, we were effectively pushed out of public space. So we had to do our projects in places like Tunisia and other countries, which also took us somehow out of our communities and further created this distrust that we are implementing foreign agendas or implementing someone else's priorities because we're not in the country, we're not able to work with people"^[61]. One of the Iraqi organizations explained that civil society focused on accomplishing what was required by donors repeatedly working with governments and decision-makers, all the while turning a blind eye to the rest of society.

This made civil society vulnerable to the power of higher authorities who can abort the achievements of civil society within an instant ^[62]. Building on this, this same organization shared the following analysis: "We have begun to see that even the voice of human rights organizations has become less powerful. Before, our voices were raised with every violation, every breach and every crime that occurred because the voices of human rights defenders were loud. Today, due to the use of different patterns of assassinations, legal prosecutions and malicious lawsuits, all those working in the field of human rights are aware that there is a new method and which is not spontaneous. In the past, the government and political parties would target a person active in human rights issues, either assassinating him/her or initiating a lawsuit, which would then create an uproar of rejection from organizations and society. However, currently, the pattern that is taking place is that this is preceded by an attack on the reputation of a person. Photos are posted of this person with foreign ambassadors and they would be accused of being an agent, etc. When the social sympathy is low, this person is assassinated." The disruption in the relation between civil society and society/ community leads to a distrust that becomes a nurturing field for civil society's vulnerability to various threats.



Once more this reiterates the need to rethink the type of partnership and power relations donors and intermediary funders build with civil society. There is a need to rethink the approaches to strengthening and sustaining civil society. The state of survivalism, based on unequal power relations, dependency and competition will undermine civil society working on human security and human rights: those who seek to address the root causes of indignity in their societies.

4. GOING BEYOND: FROM SURVIVING TO FLOURISHING

Despite the bleakness of this depicted state of survivalism, the reality on the ground is more complex. Some of the stories shared by the organizations tell of bank employees and civil servants who have shielded and protected activists and CSOs from repressive measures. There have been donors who have circumvented repressive practices, created alternatives for CSOs and adapted procedures to the conditions in the country. Despite the hardships, CSOs are continuing to work with the means available to them. Civil society in the MENA is resilient and in the face of these repressed and closed civic spaces, they have created pockets where they have been able to operate. We have asked the CSOs we consulted what they think would be useful for them. In the following section, we share some of their recommendations and we reflect on their experiences to identify repertoires of actions and potential strategic avenues of action moving forward. These range between short-term coping strategies as well as longer-term systemic change. They require rethinking and action by civil society organizations as well as donors, including INGOs who operate as intermediary funders.

Based on the consultations, the following coping mechanisms were employed by respondents to deal with the challenges they are facing:

4.1. FINDING LEGAL WORK-AROUNDS

4.1.1. LEGAL STATUS AND CONTRACTS

In the absence of real systemic changes, organizations have found ways to navigate the challenges they are facing. One example of this is in countries where it has become extremely difficult to register as a Not-for-Profit Organization (NPO),

and where that legal entity is much more tightly regulated than businesses, some organizations have begun registering as not-for-profit companies or social enterprises. This does come with its challenges, as this legal form does not enjoy tax exempt status as the NPO legal form often does. Not all donors will accept that, and it can limit fundraising opportunities. Still, in the face of limited options, some organizations have chosen this route.

Another route followed by one of the CSOs has been for funders to cooperate with civil society organizations but then to sign the contracts with the individuals in the organizations, rather than with the organization. Even though this undermines at first glance the logic underpinning principles of civil society, collective action and the freedom of association, it has offered this organization operating in a dangerous context and a closed civic space an opportunity to continue their work of defending human rights.

- Both of the above require the buy-in of and commitment by funders who may be willing to collaborate and explore alternatives with CSOs and to adopt a more constructive and inclusive notion of civil society.

4.1.2. REFRAMING AND COMMUNICATIONS

Another approach that is widely taken by civil society organizations working in challenging contexts is to be very careful in how they frame the work they are doing. They may present themselves as more of a technical centre, rather than an advocacy organization, for example, or not publicize the target group they are working with. In countries like Libya and Iraq, many civil society organizations do not use the term “gender” or other terms that are associated with the feminist movement, for example, even if those topics are a part of their work, as it brings with it added scrutiny. This is another area in which communication between donors, partners and local organizations is incredibly important, as often the donor would like to showcase the results of the program in language that fits their frame of reference, whereas doing so in some of these contexts can put organizations at great risk.

4.2. BUILDING NETWORKS

Facing several types of challenges, including lack of resources, repression, unequal power relations, etc, some organizations mentioned resorting to networks. These networks can generally be divided in three categories:

4.2.1.NETWORKS COMPOSED OF DIVERSE TYPES OF ORGANIZATIONS

The discussions we held with the CSOs make clear that to some extent, different types of organizations are affected in different ways by restrictions. Overall human rights organizations, especially those working on ‘hot topics’ such as the rights of migrants, LGBTQI+, gender, etc. (depending on the contexts) and the more vocal organizations are the ones that are the first to be impacted by restrictions.



Organizations that are perceived as more neutral or more technical are usually affected in the later phases of closing civic space. But the certainty is that all civil society organizations serving the common good will be affected sooner or later. Solidarity between diverse CSOs, with a range of sizes, themes, contacts, and areas of expertise, organizing under a network have offered repertoires of action to fight back on some of the shrinking space dynamics such as the crackdown on freedom of expression, association and assembly and has increased CSO's leverage to advocate on issues at stake. These networks can be international, regional, national or local, depending on the issue, and can provide advocacy support and a sense that organizations being targeted are not in it alone.

The opportunity that networks provide is a veneer and degree of separation between the specific organization and the collective. It allows statements and advocacy to be conducted by the collective, which can be more effective and can better protect the individual organizations. Additionally, the diversity within the network also creates the possibility for the various organizations to amplify voices of other members when these organizations are not able to speak up because their mandate would not allow them to do so for example and/ or when it would be too dangerous for them to do so.

A particular strength of the network lies in the number of its members. One respondent recounted that “sometimes some members of networks or local organizations are arrested, so we, as local organizations, hold an emergency meeting to think about what can be done. When we put pressure through social media, the strength balance is in our favour (more than the state)^[63]. One of the respondents shared that being the biggest network of organizations in their country, coupled with hard work and the credibility and trust they built with stakeholders earned them a seat at the table in many important national coordination platforms. “This allowed us to also be vocal directly with the key stakeholders and the key decision makers, either the UN agencies or the donors and it has been very important in the past years.^[64]” This enabled them to raise the issues that were essential for the members of the network, have their voices and concerns heard and succeed in their advocacy.

4.2.2. NETWORKS OF SOLIDARITY AND MUTUAL AID

Going beyond joint advocacy, within these networks, organizations support each other by pooling and sharing resources, ideas and at times even staff in order to help navigate challenges. These are often organizations that operate in the same country or area and are able to move quickly to provide each other support. They increase their resilience this way, because they are less vulnerable when funding challenges present themselves, as the other organizations in their network can provide the support that they need in times of crisis. Much of this work happens under the radar and has been an antidote to the spirit of competition often fostered by current funding streams. One respondent mentioned,

“[Another organization in our province] provides legal defence services and human rights awareness raising services, but they do not have a specialized psychological team, so they contact us and tell us we need your help in this governorate. We provide them with services. It decreases the costs because we do this for free, we only take transportation costs. When we have activities and we need, for example, legal services or awareness raising or a specialized trainer [...] we ask them to help us. So the work does not stop because we cooperate with each other. Sometimes the budget is smaller but the amount of activities is bigger.”^[65] It implies the rethinking of individualistic ideas of civil society organizations as being separate entities, each one fending for itself and trying to survive, and starting to think more in terms of collaboration, cooperation and solidarity.

As we write this report, we are witnessing a drastic shift in the opposite direction of these changes this report sees as necessary. Donors are cutting back significantly, and restrictions are likely to rise, which will increase competition and will surely negatively impact local civil society. This further underscores the importance of solidarity between civil society organizations, internationally and locally, and the importance of creating those bonds of mutual aid that are less vulnerable to shifts in donor funding priorities or funding streams.

4.2.3. BUILDING SOCIAL CAPITAL IN TRADITIONALLY CS UNFRIENDLY INSTITUTIONS

Possessing and building relationships with people in diverse institutions (state, bank, etc.) has eased some of the restrictions but more importantly has also protected some human rights defenders when threats arose. Many of the stories shared demonstrate the complexity of institutions which are constructed by laws, rules, budgets, power and more importantly by people who possess discretionary power. As highlighted by one of our respondents, “[we] use our personal relationships [...] we try to be kind to all these people so that we can win them over as friends. Then they can help us make with procedures so that we have access to the field or make steps forward with administrative procedures. At first we used to shame them and publicize the problems on social media, but this got us into more problems. We cannot confront a government that has power and law and deterrence, so we were smart.”^[66] This approach very much relies on the receptiveness of the individual person, and is vulnerable to staff changes or power shifts. It is also conditioned by the extent of repression and the discretionary power people have within certain institutions. Although there have been some examples of successful naming-and-shaming advocacy campaigns, in cases of heightened repression, it is not always an efficient or feasible strategy.

4.3. ENHANCING COMMUNITY TRUST THROUGH AN ENABLED CIVIL SOCIETY ENVIRONMENT THAT CENTRES COMMUNITY NEEDS AND PARTICIPATION

A recurring theme across the experiences shared by the CSOs we consulted was that of trust. It was mentioned as an essential aspect of the relationships some tried to build with donors and partners. Trustful relationships enabled them to discuss with donors more contextually sensitive and less rigid funding requirements, reporting procedures and documentation. The experiences shared on community trust on the other hand highlighted the loss of this trust. Meanwhile all CSOs understood that the lack of community trust in civil society is a factor contributing to the vulnerability of CSOs to repressive and violent state and non-state actors. Therefore it is essential to re-build community trust.

To this end, CSOs need to rethink the manner in which they work with communities. They can involve their communities in their programs through more participatory and collaborative approaches. This requires donors to be more open to community-driven projects, and allow CSOs to create their own metrics of success by relying on local knowledge. As this report outlines, prescriptive programs funded by donors and written by international partners can have an impact on the contextual fit of a program and limit a local organization's ability to adjust the program to the needs of the community. Yet it remains crucial that civil society find ways to ensure that they have the buy-in of the communities that they serve and that these communities feel represented by them. This can be a difficult task in highly polarized communities, but it remains important for civil society to be aware of how it is being perceived by ensuring it stays connected to the communities they are serving. This will require CSOs and donors to foster a more equal and inclusive distribution of decision-making power and reinforce an environment that is driven by solidarity and cooperation rather than hierarchical structures that strengthen competition and tensions.

4.4. THE ROLE OF DONORS

Funders and INGOs have a role to play in protecting civic space as highlighted through the recommendations shared throughout this chapter. In order to enable many of the abovementioned repertoires, CSOs require the endorsement and cooperation of donors who understand the challenges as they play out in the contexts where the organizations operate. It also requires an openness from funders to seek alternatives, rethink what was taken for granted and a willingness to share the risks that come with exploring less conformist ways of working.



As such donors should shift from focusing primarily on formal financial controls and standardised metrics to fostering a more collaborative and people/human centred approach. This could be achieved by building a more long-term trust based relationship, foster participatory grantmaking, and consulting more regularly with a diverse group of civil society organizations, including small and grassroots organizations on the impacts of its requirements and procedures. Much can be learned from the initiatives that have started to pilot and experiment such transformative processes^[67].

End Notes:

1. United Nations Development Programme. (2024). *Human Development Report 2024*. <https://hdr.undp.org/>
2. The Fund for Peace. (2025, February 18). *Fragile State Index 2024: A world adrift*. <https://fragilestatesindex.org/wp-content/uploads/2025/02/FSI-2024-Report-A-World-Adrift-2.pdf>
3. Salam, N. (2002, October). *Civil society in the Arab world: The historical and political dimensions* (Occasional Publications No.3). Harvard Law School, Islamic Legal Studies Program. https://pil.law.harvard.edu/wp-content/uploads/2019/12/Civil-Society_Nawaf-Salam.pdf
4. The CIVICUS Monitor, launched in 2017, tracks the state of freedom of association, peaceful assembly and expression in 198 countries and territories. CIVICUS Monitor (2025) National Civic Space Ratings: 40 rated as Open, 42 rating as Narrowed, 35 rated as Obstructed, 51 rated as Repressed & 30 rated as Closed. Available at: www.monitor.civicus.org (Accessed: 2025-03-19).
5. NYU Paris EU Public Interest Clinic, Bank De-Risking of Non-Profit Clients (2021). https://www.hscollective.org/assets/Uploads/NYU-HSC-Report_FINAL.pdf
6. Civic Horizons is a regional consortium co-funded by the EU and comprising seven CSOs striving to enhance civil society conditions through unique, innovative, and strategic ways.
7. Duke Law International Human Rights Clinic and Women Peacemakers Program (2017). *Tightening the Purse Strings: What Countering Terrorism Financing Costs Gender Equality and Security*. <https://law.duke.edu/sites/default/files/humanrights/tighteningpursestrings.pdf> ; Overseas Development Institute (2018) 'A humanitarian sector in debt': *Counter-terrorism, bank de-risking and financial access for NGOs in the West Bank and Gaza*. <https://odi.org/en/publications/a-humanitarian-sector-in-debt-counter-terrorism-bank-de-risking-and-financial-access-for-ngos-in-the-west-bank-and-gaza>
8. Respondent 14
9. Respondent 4
10. Respondent 8
11. Respondent 17
12. Respondent 9
13. Respondent 23
14. Respondent 9; 15 and 23
15. Respondent 14
16. Respondent 4
17. Respondent 17
18. Respondent 14
19. Financial Action Task Force (FATF). (2021). *High-Level Synopsis of the Stocktake of the Unintended Consequences of the FATF Standards*. <https://www.fatf-gafi.org/en/publications/Financialinclusionandnpoissues/Unintended-consequences-project.html>

20. By “hot issues” we refer to controversial human rights issues that lead to uproar in society and oppression by the state. These hot issues vary from one country to another, from one period to another, but are overall connected to issues such as gender equality, minority rights, LGBTQI+ rights and rights of migrants.

21. Respondent 1

22. Respondent 8

23. Respondent 12

24. Respondents 15 and 17

25. Respondent 16

26. Respondent 7 and 16

27. Respondent 1 and 3

28. Respondent 1

29. Respondent 14

30. Respondent 2

31. Respondent 2

32. Respondent 14

33. Respondent 2

34. Respondent 2

35. Respondent 4

36. Respondent 5; 7 and 13

37. Respondent 11

38. Respondent 7

39. Respondent 18 and 20

40. Respondent 18

41. Respondent 20

42. Respondent 20

43. This has also been documented by other reports and articles such as:

Overseas Development Institute (2018) *‘A humanitarian sector in debt’*:

Counter-terrorism, bank de-risking and financial access for NGOs in the West

Bank and Gaza. [https://odi.org/en/publications/a-humanitarian-sector-in-debt-](https://odi.org/en/publications/a-humanitarian-sector-in-debt-counter-terrorism-bank-de-risking-and-financial-access-for-ngos-in-the-west-bank-and-gaza)

[counter-terrorism-bank-de-risking-and-financial-access-for-ngos-in-the-west-](https://odi.org/en/publications/a-humanitarian-sector-in-debt-counter-terrorism-bank-de-risking-and-financial-access-for-ngos-in-the-west-bank-and-gaza)

[bank-and-gaza](https://odi.org/en/publications/a-humanitarian-sector-in-debt-counter-terrorism-bank-de-risking-and-financial-access-for-ngos-in-the-west-bank-and-gaza)

44. Respondent 18

45. Respondent 22

46. Respondent 1

47. Respondent 2; 6; 10; 13; 14 and 16

48. Respondent 6

49. Respondent 10 and 16

50. Respondent 14 and 16

51. Respondent 1

52. Respondent 1; 3; 14; 16 and 17

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53. Amnesty International. (2023, November 27). Open letter on EU and several European states concerning decision to suspend and review of funding to Palestinian and Israeli NGOs. <https://www.amnesty.eu/news/open-letter-on-eu-and-several-european-states-concerning-decision-to-suspend-and-review-of-funding-to-palestinian-and-israeli-ngos/>
54. Respondent 8
55. Respondent 19
56. Respondent 22
57. Respondent 16
58. Respondent 22
59. Respondent 16
60. Respondent 4
61. Respondent 16
62. Respondent 14
63. Respondent 2
64. Respondent 8
65. Respondent 2
66. Respondent 2
67. Leading from the South. (n.d.). Home. <https://www.leadingfromthesouth.org/>

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It is only through active participation of civil society organizations from the global south majority that the efficient and meaningful transformation of civil society environment can take shape.



Disclaimer: The opinions, findings, and conclusions stated herein are those of the interviews and analysis conducted by HSC and do not necessarily reflect those of the European Union (EU) or the Civic Horizons Consortium.