

SHRINKING CIVIC SPACE & MARGINALISED COMMUNITIES

IN EASTERN EUROPE
AND CENTRAL ASIA



Why This Research Matters



- Community-led responses are essential in the fight against HIV and TB
- Civic space is shrinking across EECA
- Legal and administrative pressures affect public health by discouraging community-led advocacy and services

Scope

- Civil space components examined:
 - Freedom of association
 - Freedom of peaceful assembly
 - Freedom of expression and access to information
 - Criminalisation of key populations and protection from reprisal
- Countries covered:
 - Armenia, Azerbaijan, Belarus, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Tajikistan, Ukraine, Uzbekistan
- Timeframe:
 - 2024–2025

Methodology

- Regional Civic Space Monitoring Instrument applied across 10 EECA countries
 - Initial assessment instrument
 - Case documentation instrument
- Data collection by national focal points with legal and contextual expertise:
 - Conduct desk review of laws, policies and documented cases
 - Fill out research instruments
 - Participate in regular discussion with EHRA staff and report writer
- Structured questions covering:
 - special restrictive laws (foreign agent, anti-propaganda, child protection frameworks)
 - general legislation and regulatory environment (including NGO regulations)
 - enforcement practice and real-life application
- YES / NO / N/A comparative framework with qualitative analysis

Overall Regional Picture

- Several countries recorded **intensified legal and regulatory pressure** on civil society during the reporting period, most notably **Georgia, Kyrgyzstan, Azerbaijan and Belarus**
- New or expanded special **laws on “foreign influence”, “anti-propaganda” and “child protection”** were introduced or operationalized in **Georgia, Kyrgyzstan and Azerbaijan**
- **Selective enforcement and administrative pressure** increased in **Belarus, Azerbaijan, Tajikistan and Uzbekistan**
- **Democratic backsliding** became visible in contexts previously considered more open, particularly **Georgia**
- Across the region, these developments disproportionately affected organizations working with LGBTQI+ communities, people who use drugs and other key populations
- **Trend:** 2024–2025 reflects consolidation and intensification of restrictive civic space patterns rather than isolated developments.

Freedom of Association

| No. | Question text | AM | AZ | BE | GE | KZ | KY | MD | TJ | UA | UZ |
|------|---|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| 1.1 | Does your country currently have a 'foreign agent' law? | NO | NO | NO | YES | NO | YES | NO | NO | NO | NO |
| 1.2 | Are there any other laws adopted that restrict registration, operation and/or funding of CSOs? | NO | YES | YES | YES | YES | NO | NO | NO | NO | YES |
| 1.4 | Can community-led (PLHIV, PUD, LGBTQI+, SW) organisations register and maintain operations (e.g. open a bank account) in your country? If at least one community group was denied registration of a CLO or was prevented from maintaining operations, the answer is 'NO'. 'YES' may mean that either all registration applications of community groups were granted and CLOs have not faced any bureaucratic obstacles for continued operation, or no applications have been filed to register a CLO/there are no registered CLOs operating in the country. | YES | YES | NO | YES | NO | NO | YES | YES | YES | NO |
| 1.7 | Have there been cases during 2024-2025 of CSOs & community-led organisations working in the HIV/KP field closing and/ or activists from KPs arrested due to adopted 'foreign agent' law or other laws restricting registration, operation and/or funding of CSOs? If at least one organisation reported closing/one activist getting arrested, the answer is 'YES'. | NO | NO | YES | NO | NO | YES | NO | YES | NO | NO |
| 1.8 | Were there cases during 2024-2025 when CSOs & community-led organisations working in the HIV/KP field had to undergo unnecessarily frequent (as according to the law) fiscal or any other audits and governmental checks? If at least one CSO or CLO had to undergo unnecessary audits and government checks, the answer is 'YES'. | NO | NO | YES | YES | NO | NO | NO | N/A | YES | NO |
| 1.9 | Have CSOs & community-led organisations working in the HIV/KP field been exposed to raids by law enforcement or other official authorities during 2024-2025? If at least one CSO or CLO has been exposed to a law enforcement raid, the answer is 'YES'. | NO | NO | YES | YES | NO | NO | NO | NO | NO | NO |
| 1.10 | Have CSOs & community-led organisations working in the HIV/KP field been prevented from receiving domestic funding (state, municipal, crowdfunding within the country) during 2024-2025? If at least one CSO or CLO has been prevented from receiving domestic funding, the answer is 'YES'. | NO | YES | YES | NO | YES | NO | NO | NO | YES | NO |
| 1.11 | Have CSOs & community-led organisations working in the HIV/KP field been prevented from receiving foreign funding during 2024-2025? If at least one CSO or CLO has been prevented from receiving foreign funding, the answer is 'YES'. | NO | YES | YES | YES | YES | YES | YES | NO | NO | YES |

Freedom of Association

- **“Foreign agent” or “foreign influence” frameworks** expanded or became operational in **Georgia and Kyrgyzstan**, with heightened regulatory control over civil society organisations
- **Administrative barriers to registration, reporting and day-to-day operation** intensified in **Azerbaijan, Belarus and Tajikistan**
- **Selective application of NGO regulations** increasingly affected organisations working on LGBTQI+ issues, harm reduction and rights-based advocacy, particularly in **Belarus and Azerbaijan**
- **Compliance pressure and inspections** created growing legal uncertainty for community-led organisations in **Uzbekistan and Tajikistan**
- Overall, restrictions on freedom of association were most pronounced in **Georgia, Kyrgyzstan, Belarus and Azerbaijan** during the reporting period
- **Trend:** 2024–2025 saw a shift from formal regulation to targeted legal frameworks and intensified administrative control over civil society

Freedom of Peaceful Assembly

| No. | Question text | AM | AZ | BE | GE | KZ | KY | MD | TJ | UA | UZ |
|-----|--|----|----|-----|-----|-----|-----|-----|----|-----|-----|
| 2.3 | Since adoption of the 'foreign agent' law or other laws restricting registration, operation and/or funding of CSOs, has cooperation with governmental institutions become unsafe? E.g. started requesting additional, personal data; providing details of the event could end up in governmental officials storming in; provided data can end up with law enforcement institutions. | NO | NO | YES | YES | YES | YES | NO | NO | NO | YES |
| 2.4 | Were there any signs or evidence that gatherings organised by CSOs & community-led organisations working in the HIV/KP field were watched, recorded and/or attended by governmental officials without consent of the organisers during 2024-2025? | NO | NO | YES | NO | YES | YES | NO | NO | NO | YES |
| 2.5 | Have there been any major protests/ demonstrations/ public gatherings on issues related to human rights, services or lifestyles/existence of KPs (PLHIV, PUD, LGBTQI+, SW) during 2024-2025? Actions of solidarity, e.g. on 1st December, are not included here. | NO | NO | NO | YES | NO | NO | YES | NO | YES | NO |

Freedom of Peaceful Assembly

- **Authorisation regimes and practical barriers to holding assemblies** remained highly restrictive in **Belarus, Azerbaijan and Tajikistan**, effectively limiting public demonstrations
- **Increased policing and discouragement of gatherings** affecting sensitive issues, particularly LGBTQI+ events, were observed in **Georgia and Kyrgyzstan**
- **Selective restrictions on assemblies** related to human rights, drug policy and gender diversity intensified in **Azerbaijan and Belarus**
- In several contexts, formal legal guarantees existed but were overridden in practice through **administrative refusals and security-based justifications**, notably in **Uzbekistan and Tajikistan**
- Overall, freedom of peaceful assembly was most constrained in **Belarus, Azerbaijan, Tajikistan and Kyrgyzstan** during the reporting period
- **Trend:** Restrictions increasingly operate through authorisation procedures, policing and selective denial rather than explicit legal bans.

Freedom of Expression and Access to Information

| No. | Question text | AM | AZ | BE | GE | KZ | KY | MD | TJ | UA | UZ |
|-----|--|-----|-----|-----|-----|-----|-----|----|-----|----|-----|
| 3.1 | Does your country currently have laws restricting public information labelled as promoting drug use ('drug propaganda')? | NO | YES | YES | NO | YES | YES | NO | YES | NO | YES |
| 3.2 | Does your country currently have laws restricting public information labelled as promoting LGBTQI+, positive depiction of LGBTQI+ identities and/or lifestyles ('LGBTQI+ propaganda')? These could also be laws protecting traditional/ family values and/or children. | NO | NO | YES | YES | YES | YES | NO | NO | NO | NO |
| 3.3 | Have there been any restrictions on publishing, printing or sharing through social media of information about health and social services and rights of KPs introduced or practiced during 2024-2025? | NO | NO | YES | YES | NO | YES | NO | NO | NO | NO |
| 3.4 | Have there been cases of self-censorship by CSOs & community-led organisations working in the HIV/KP field (e.g. closing of social media channels, webpages, changing language of public channels)? Are there certain topics or causes that CSOs & community-led organisations working in the HIV/KP field avoid promoting because of a fear of negative repercussions during 2024-2025? | YES | NO | YES | YES | NO | YES | NO | YES | NO | YES |

Freedom of Expression and Access to Information

- **“Anti-propaganda” and “child protection” laws** were expanded or actively enforced in **Georgia and Kyrgyzstan**, directly restricting public discussion of LGBTQI+ issues and rights
- **Morality-based censorship** increasingly affected HIV prevention, sexuality education and community advocacy in **Azerbaijan and Belarus**
- **Public dissemination of information** related to harm reduction and gender diversity **faced heightened scrutiny and informal restrictions** in **Uzbekistan and Tajikistan**
- **Online content regulation and media pressure** further narrowed space for rights-based communication in **Belarus and Azerbaijan**
- Overall, freedom of expression was most constrained where special restrictive laws intersected with selective enforcement, notably in **Georgia, Kyrgyzstan, Belarus and Azerbaijan**
- **Trend:** 2024–2025 saw growing institutionalisation of censorship through morality-based legislation and targeted enforcement

Criminalisation of Key Populations and Protection from Reprisal

| No. | Question text | AM | AZ | BE | GE | KZ | KY | MD | TJ | UA | UZ |
|-----|--|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| 4.1 | Is drug use prohibited in the country (under criminal and/or administrative code or other legal document)? | YES | NO | YES | YES |
| 4.2 | Is drug possession for personal use prohibited in the country (under criminal and/or administrative code or other legal document)? | YES |
| 4.3 | Does the patient registry of people using drugs restrict some of their rights (e.g. obtaining/maintaining driving license, education, employment) in the country as of 2025? | YES |
| 4.4 | Are homosexual relationships prohibited in the country (under criminal and/or administrative code or other legal document)? | NO | YES |
| 4.5 | Have there been cases of people being prosecuted for homosexual relationships under these laws? | NO | YES |
| 4.6 | If LGBTQI+ are not directly criminalised in your country, have there been cases of arrest or risk of arrest for belonging to LGBTQI+ or for homosexual relationships during 2024-2025? Have there been cases of LGBTQI+ charged for other criminal offenses, such as dissemination of pornography, vagrancy, hooliganism, disorderly conduct during 2024-2025? | NO | NO | YES | NO | YES | YES | NO | YES | NO | NO |
| 4.7 | Does the country have any laws/policies related to intentional or unintentional HIV transmission, non-disclosure, or exposure? | YES |
| 4.8 | Is it legally required to do the HIV test before marriage as of 2025? | NO | YES | YES | NO | NO | NO | NO | YES | NO | YES |
| 4.9 | Have there been cases of people prosecuted under these laws mentioned in questions #4.7-4.8 during 2024-2025? | YES | NO | YES | NO | YES | N/A | NO | YES | NO | YES |

Criminalisation of Key Populations and Protection from Reprisal

- **Criminalisation of drug use** remained severe in **Belarus, Azerbaijan, Tajikistan and Kyrgyzstan**, directly affecting harm reduction and outreach activities
- **HIV criminalisation** provisions continued to create legal particular risks for people living with HIV in **Belarus and Azerbaijan**, reinforcing stigma and fear of engagement with services
- LGBTQI+ communities faced heightened legal vulnerability under **morality-based and anti-propaganda frameworks** in **Georgia, Kyrgyzstan and Azerbaijan**
- **Protection from reprisals** against activists and community organisations **remained weak or inconsistent** across most countries, particularly in **Belarus, Azerbaijan and Tajikistan**
- **Informal pressure, inspections and intimidation** continued to be used as control mechanisms in **Uzbekistan and Tajikistan**, despite formal legal guarantees
- **Trend:** Criminal law and weak protection mechanisms remain central tools for controlling community-led responses across EECA

Adaptation, Coping Strategies and Resilience of CLOs

- Organisations increasingly **adjusted operational models** to reduce legal and security risks, particularly in **Belarus, Azerbaijan and Tajikistan**
- **Advocacy** was often **reframed into neutral public health language** to avoid political or moral scrutiny, notably in **Georgia and Kyrgyzstan**
- **Public visibility was reduced** through closed meetings, limited online presence and informal service delivery channels across multiple countries
- **Sensitive issues** such as drug use, sexuality and gender diversity were **selectively removed from communications** in **Uzbekistan and Azerbaijan**
- Many organisations **shifted focus from rights-based advocacy to service provision** as a survival strategy
- While these strategies enabled continued operation, they also narrowed advocacy space and long-term systemic impact

Conclusions

- Civic space across EECA is increasingly constrained through a combination of special restrictive laws, general regulatory frameworks and enforcement practices
- The period 2024–2025 confirms consolidation and intensification of these restrictive trends rather than isolated or temporary developments
- Restrictions affect all four core dimensions of civic space, with particularly strong impact on community-led organisations working with PLHIV and key populations
- Legal and administrative pressure directly undermines the sustainability, reach and effectiveness of community-led HIV and TB responses
- Adaptation and coping strategies enable organisational survival but reduce advocacy space and long-term systemic impact

Recommendations for Governments

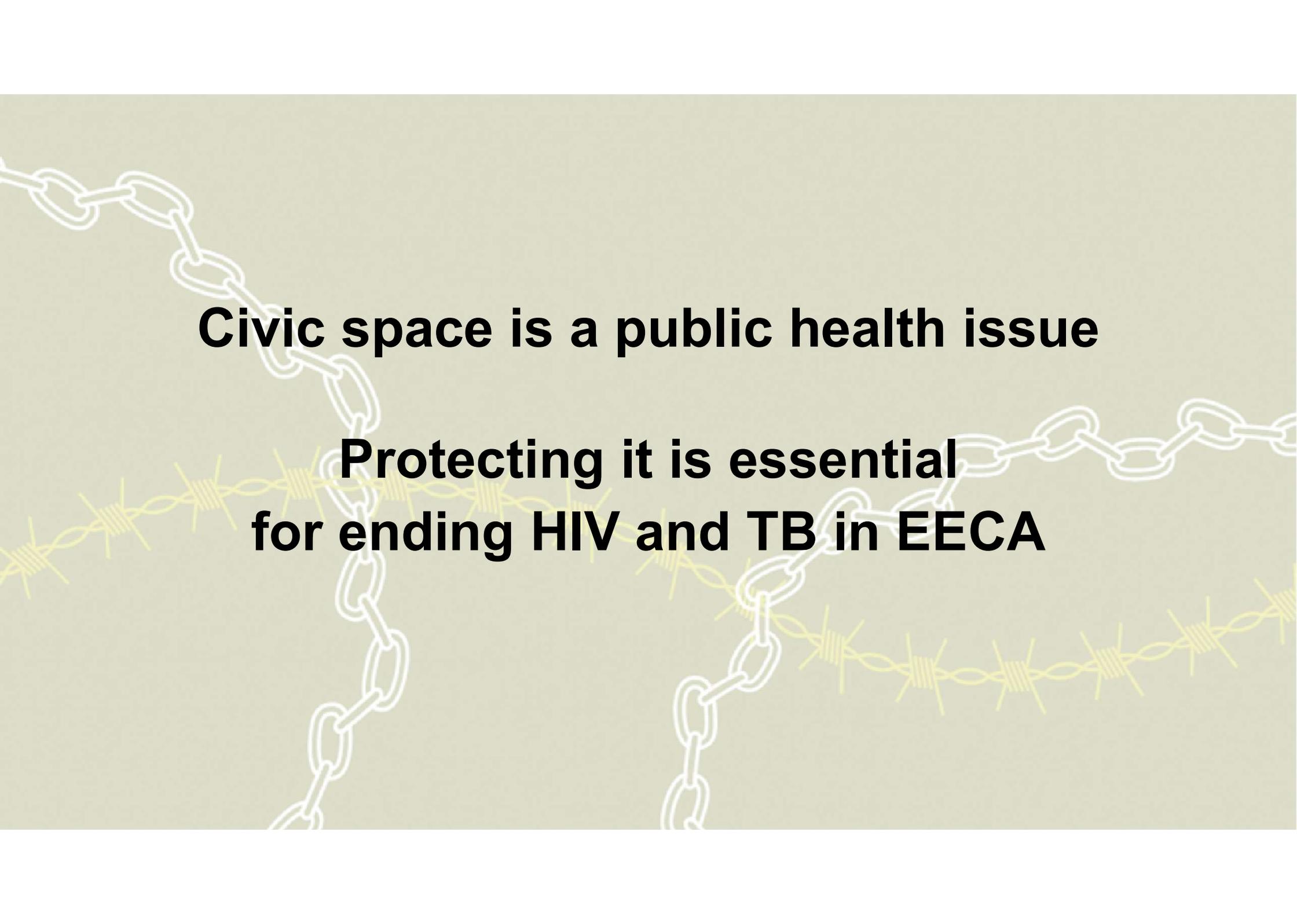
- Repeal or amend special restrictive laws that disproportionately limit civic space, including foreign agent, anti-propaganda and related frameworks
- Ensure that NGO registration, reporting and funding regulations comply with international human rights standards
- Guarantee protection from reprisals for activists and community-led organisations
- Ensure that criminal law does not undermine public health responses, particularly regarding drug use and HIV-related provisions
- Enable meaningful participation of community-led organisations in public health policymaking

Recommendations for International Donors and Partners

- Sustain and increase funding for community-led HIV and TB responses in EECA
- Integrate civic space monitoring into health and development funding frameworks
- Support legal protection and risk mitigation mechanisms for community-led organisations
- Prioritise flexible funding to enable organisations to respond to changing regulatory environments
- Engage diplomatically where restrictive laws undermine public health outcomes

Recommendations for Civil Society and Community Networks

- Strengthen regional coordination and solidarity across EECA
- Systematically document and monitor legal and enforcement developments
- Invest in legal literacy and risk management capacity
- Maintain strategic advocacy while adapting communication where necessary
- Engage in cross-sector alliances to defend civic space and public health

The background features a light beige color with a white chain and yellow barbed wire graphic. The chain is on the left and bottom, while the barbed wire is on the right and bottom.

Civic space is a public health issue

**Protecting it is essential
for ending HIV and TB in EECA**