





# POLICY

## PAPER

### IS CIVIL SOCIETY SHRINKING IN ALBANIA?:

### ITS REACTION TO CURRENT TRENDS

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#### LIST OF ABBREVIATIONS

- ASCS Agency for the Support of Civil Society
- **EU** European Union
- HIDAACI High Inspectorate for the Declaration and Audit of Assets and Conflict of Interest
- **CRIPDP** Commissioner for the Right to Information and Personal Data Protection
- **CEC** Central Election Commission
- NCSC National Civil Society Council
- HJC High Judicial Council
- **NPO** Non-Profit Organization
- NGO Non-Governmental Organization
- CSO Civil Society Organization
- CS Civil Society
- **VAT** Value Added Tax

#### 1. INTRODUCTION

In the context of rapid developments that society in general is faced with, new issues arise, which require different reactions compared to ordinary ones. These changes affect man as a being in himself and then are reflected also in groups that are linked by similar or shared interests. Precisely these groups are the ones that assume diverse forms and that are currently defined generally under the term of "civil society." This term began to be used around 1980s and was mainly linked with new non-governmental movements that sought to create opposition to the time's authoritarian regimes.

At present, although regimes have assumed more democratic forms, the role of civil society to exercise its influence remains just as essential as before. Organized groups are evolving in their reactions to the developments and trends of the era we live in. This Policy Paper seeks to address precisely that reaction that the civil society sector in Albania is displaying toward current trends that it is faced with. These trends are reflected also in the legal form that lawmakers give in response to new needs that arise. Analyzing the legal framework in force, its implementability to date, its current state and adaptability to the demands presented by CS representatives, the document will recommend concrete measures that are suggested in order to avoid the shrinkage of the CS role in Albania.

#### **1.2** Current legal framework

Civil Society (CS) is a key component of a democratic society. Through its constructive role, the CS plays an important role in the smooth functioning of a democratic state. understanding the trajectory of CS and its impact on our country's political and social structure is essential for evaluating the country's progress toward a sustainable democracy. There is no well-defined definition of what the concept of CS encompasses as it bears with it a wide range of groups, communities, or organizations that function in an independent manner from government influences. In fact, not so rarely, CS also indicates the very elements of the right to expression and organization. CS has a great impact on the development of political decision-making and the improvement of citizens' lives, helping with building an open and inclusive society.

In Albania, in its current form, CS appeared in the 1990s with the fall of the dictatorial regime and the establishment of the democratic one. The country's transition from a totalitarian regime to a democracy brought about important changes. Although it has been continuing for over three decades, the transformative process has been accompanied by subsequent challenges. In spite of the presence of challenges and obstacles, non-government organizations (NGO) have helped develop and strengthen democracy, guarantee respect for the fundamental rights and freedoms of citizens, and in improving civic activism.

Freedom of organization is guaranteed by the Constitution of the Republic of Albania in article 46, paragraph 1, which expressly envisages that *"Anyone shall have the right to be organized* 

*collectively for any legal purpose.*<sup>11</sup> Also, paragraph 3 of this article envisages the restriction of this right as the law prohibits the creation and functioning of organizations or associations that pursue anti-constitutional goals. Law no. 8788, dated 7.5.2001 "On non-profit organizations," amended, is the main legal framework that guides the sector. It determines the rules for the founding, registration, functioning, organization, and activity of NPOs, and envisages concrete guarantees against the state's interference with CSOs' internal matters.

Law no. 80/2021 "On the registration of non-profit organizations," approved in 2021, establishes the process of registration for non-profit organizations as well as the rules for maintaining the register for non-profit organizations. By decision no. 35, of 26.1.2022 "On the creation and putting into function the electronic register of non-profit organizations," the High Judicial Council (HJC) decided that the electronic register would become functional since December 30, 2023. One of the most important developments regarding the implementation of this law and its compatibility with the Constitution, the ratified conventions, and best international standards, is decision no. 62, dated 20.11.2023, issued on the basis of a request of a group of CSOs, among which the Albanian Helsinki Committee (AHC), on the invalidation of some provisions of the law. The request was accepted partially by the Court, which decided to invalidate several provisions regarding the obligation for initial registration within the 30-day deadline, envisaged in article 8 of the law, the competences of the chancellor, and the complaint procedure.<sup>2</sup> The Court reached the conclusion that not only does it not derive as such from legislation in power, but, on the one hand it leads to other additional obligations for these subjects and, on the other hand, disrespect for it leads to this being considered a violation, the consequence for it being an administrative penalty by a fine. Therefore, this provision puts a disproportionate burden, especially on organizations seeking to be established anew, thus representing an obstacle to freedom of organization.<sup>3</sup>

Meanwhile, the existing legal framework includes also the Agency for Support for Civil Society (ASCS), as a central, budgetary public entity, that operates for the purpose of encouraging, through financial assistance, the sustainable development of civil society and the creation of favorable conditions for civic initiatives for the good and interest of the public.

A series of other institutions have also played an important role for the empowerment and development of CS, including the legislative represented by the Assembly of the Republic of Albania, and the ASCS, the NCSC, and groups of organizations in networks, such as Partners Albania for Change and Development, Monitoring Network against gender-based violence, etc.

This Policy Paper was consulted with some of the main stakeholders, such as ASCS, NCSC members, and CSO representatives at a round table on 31.01.2024, while the addressed suggestions and recommendations were appreciated, with the goal being their proportional and adequate reflection as it pertains to the findings and context of addressed issues.

<sup>&</sup>lt;sup>1</sup> Constitution of the Republic of Albania

<sup>&</sup>lt;sup>2</sup> <u>https://qbz.gov.al/share/15U1ATWeS46u2l1VwshxuQ</u>

<sup>&</sup>lt;sup>3</sup> Decision no. 62, dated 20.11.2023.

#### 2. SPACE FOR DEVELOPMENT OF CIVIL SOCIETY

#### 2.1. Policies undertaken to consolidate the role of civil society.

Pursuant to the obligations that our country has for successfully fulfilling the European Union accession process, the Council of Ministers approved by decision no. 539, dated 25.7.2019 the *"Roadmap for government policy toward a enabling environment for civil society development 2019-2023."* In order to further develop and consolidate the active role of civil society, the roadmap envisaged the fulfillment of some priorities as follows:

- 1. Creating and maintaining a nationwide policy for civil society development;
- 2. Service-minded government institutions that appreciate cooperation with CSOs;
- 3. Sustainable and efficient CSO inclusion in the policymaking process;
- 4. Ensuring CSO contribution to the accession process in accordance with EU best practices;
- 5. Supporting CSO volunteerism and active citizenship with special focus on the local level.<sup>4</sup>

Pursuant to the above obligations, the European Commission, in its latest screening report on Albania stressed that the *legal, regulatory and institutional framework for civil society is generally in place but a number of improvements are needed for the legal framework to be fully implemented and the institutional framework to become fully operational. The Law on Registration of Non-Profit Organizations adopted in June 2021 will be fully implemented only once the National Electronic Register of Non-Profit Organizations is established, which is required for the end of 2023. Until then, registration procedures under the 2001 law remain cumbersome as CSOs need to submit paper or electronic files to the district court in Tirana. The new register should ease the registration process and enhance transparency.<sup>5</sup>* 

In AHC's evaluation, with more than three months from the final deadline envisaged for the establishment of the electronic register, concrete measures should have been undertaken for making it fully functional. During participation as an interested party in the public consultation process on the Roadmap for the Functioning of Democratic Institutions, AHC recommended the taking of concrete steps regarding HJC capacities to ensure the functioning of the digital system for CSO registration.<sup>6</sup> Furthermore, making this system functional should be accompanied with instructions or a practical manual on its use by stakeholders.

#### 2.2 Role and functioning of the National Civil Society Council

The National Civil Society Council (NCSC) plays a special role for better functioning of CS in Albania, in its capacity as a collegial advisory, autonomous body, at the Council of Ministers, consisting of 27 members. This body was created and functions on the basis of law no. 119/2015.

<sup>&</sup>lt;sup>4</sup> Decision no. 539, dated 25.7.2019 "On the approval of the roadmap on government policy for an enabling environment for civil society 2019-2023."

<sup>&</sup>lt;sup>5</sup> European Commission, Screening report Albania, 20/07/2023.

<sup>&</sup>lt;sup>6</sup> Letter no. prot. 36, dated 22.01.2024.

It is worth mentioning that before the approval of this law, there were different discussions as to how much it would influence the strengthening of civil society's role, in terms of a practical and effective contribution, embedded with the executive.<sup>7</sup> Now, about eight years after its approval, its real functioning and applicability may be seen clearly, as this law has been part also of continued analyses of important international monitoring actors.

Regarding the above, the law envisages transparency through the publication and making available of recommendations as one of the basic principles on which the functioning of the NCSC.<sup>8</sup> Based on online searches on the official website of ASCS or NCSC, it is noted that the information reflected there is not periodically updated within reasonable deadlines from the conduct of meetings, while the structuring of information and access to published information is not easy or entirely understandable for the public.

Based on monitoring on the official website of the NCSC, it results that during 2023, there was one National Meeting for Civil Society, during which the role of the NCSC was discussed for supporting their activity. From the meeting of 24.04.2023, some priority points were shared, among which:

- Taxation / Financial sustainability;
- Enabling and supporting environment in activism;
- Support for new organizations through training and funding;
- CSO visibility and image;
- Expanding space for CSOs, etc.

Pursuant to the above meeting, the next NCSC meeting was held on 19.06.2023, and the agenda included discussions on the findings of the national meeting, in the form of important recommendations to be addressed by responsible institutional actors, such as:

1. Incorporating NPO services in the compensation scheme for earthquake damages.

2. Revision of the law on NPO registration which is unimplementable, very bureaucratic, and not flexible (e.g. for modifications, there are issues with second-level banking institutions).

3. Service organizations should not be treated as businesses in procurement procedures.

<sup>&</sup>lt;sup>7</sup> http://www.panorama.com.al/keshill-kombetar-per-shoqerine-civile-apo-instrument-politik/

<sup>&</sup>lt;sup>8</sup> Law no. 4, Law no 119/2015 "On the creation and functioning of the National Civil Society Council".

4. Local government should facilitate working premises for local NPOs (e.g. funding for infrastructure). Local government should be part of the NCSC – Communication and consultation with local government / have Local Government Agency be part of meetings.

5. Custody for disability should be recognized as work years.

6. ASCS should review the possibility of a communication campaign to advertise the NCSC and the role that civil society members in the Council could have in recommending policies. Add also the supporting role that the ASCS has as the secretariat of the NCSC.

7. The legal environment should be facilitating and supporting regarding taxation, sponsorships, fines, and financial support.

AHC judges that the priority issues and recommendations addressed in this meeting should be proactively followed up by representative members of the civil society sector in the NCSC. It is suggested to undertake a plan of measures for further follow-up of these issues in the short-term, mid-term, and long-term, in order to reflect clear indicators of concrete results that will be achieved through systematic advocacy and lobbying with responsible authorities at the local and national level.

With regard to the legal standing and composition of this body, the law envisages a minimum of three meetings per year and a group of 27 members, where three are representatives of public institutions, 13 are representatives of NPOs, and one representative of the business community.<sup>9</sup>

In AHC's evaluation, the equal number of representatives of public institutions and that of NPO representatives is not proportionate to the very purpose for which this body was created because at its focus should be the development of institutional cooperation of CSOs with public institutions and the law should represent an instrument for the good of civil society engagement to a larger and broader extent vis-à-vis that of public institutions. Furthermore, envisaging a minimum of meetings (three per year) is a relatively low and ineffective standard for the organization of this body, because policies undertaken by the executive and legislative powers are very dynamic and diverse and require greater engagement of the NCSC for issuing recommendations, comments, and actual suggestions within the shortest time possible.

Third, it is worth mentioning that regarding the functioning of the NCSC, the EU has also made its comments. The European Commission report notes that this body "*remains weak, including its ability to express CSO priorities in policymaking processes and is hardly functional.*"<sup>10</sup> During 2022, the NCSC, organized a total of two meetings, namely on 22.06.2022 and 15.11.2022.

<sup>&</sup>lt;sup>9</sup> Law no. 119/2015 "On the creation and functioning of the national civil society council"

<sup>&</sup>lt;sup>10</sup> European Commission, Screening report Albania, 20/07/2023.

Meanwhile, for 2023, three meetings were held, including the organization of the national civil society meeting on 24.04.2023.

#### 2.3. Financial policies

Financial policies undertaken in keeping with the respective goals and priorities of the executive power have had a direct impact on the development of CS space in Albania. Legislation in force envisages exemption from profit tax of entities that exercise only activities of a religious, humanitarian, charity, scientific, or educational character, the assets or profits of which are not used for the benefit of their organizers or members.<sup>11</sup> On the other hand, regarding the field of implementation of VAT legislation, paragraph 2 of article 8 of instruction no. 6 dated 30.1.2015 "On value added tax in the Republic of Albania," it is envisaged that non-profit organizations are not considered taxable entities and are not obliged to register for VAT when benefiting payments such as quotas, funds, grants, donations from donors for non-profit activity and do not pay back donors in exchange for these payments by supply of goods or services, but use the incurred payments to realize the purposes of their activity.<sup>12</sup>

The ACSC appears to be the main public body that offers financial support for civil society, through grants for projects and institutional grants. In 2022, the Agency issued 62 grants, worth 821,682 euro, compared to 943,237 euro in 2021, which reflect a reduction of about13%.<sup>13</sup> Meanwhile, according to the Annual Report of ACSC for 2022, projects extended in 12 counties of the country, for a total amount of 932,071 Euro. The situation of funding represents an important element regarding the effective functioning of CSOs, but also the efficacious guaranteeing of their independence in pursuing causes. In keeping with legislation in force and with the statute and mission of ACSC, a call was announced for the expression of interest for financial assistance during May 31 – July 1, 2022, based on the priorities established by the Supervisory Board. The four areas below were defined as such:

- 1. Health and Social Services (13 winning projects were selected)
- 2. Fight against Corruption and Legal Education for the Public and the NSDI (nine winning projects were selected)
- 3. Environment and Sustainable Development (20 winning projects were selected)
- 4. Education and European Integration (16 winning projects were selected).
- 5. Also, four projects were selected that touch upon more than one priority area.

On this aspect, the European Commission noted, "public funding to CSOs doesn't permit to ensure their sustainability or that of their activities, in particular in their role as service providers. The tax regime for CSOs is incomplete as it does not allow for individual donations. The legal framework does not provide tax incentives for corporate or individual donations to CSOs."<sup>14</sup>

<sup>&</sup>lt;sup>11</sup> Law no. 29/2023, "On the income tax".

<sup>&</sup>lt;sup>12</sup> Instruction no. 6, dated 30.1.2015 "On value added tax in the Republic of Albania".

<sup>&</sup>lt;sup>13</sup> European Commission, Screening report Albania, 20/07/2023.

<sup>&</sup>lt;sup>14</sup> European Commission, Screening report Albania, 20/07/2023.

Based on an evaluation of collected data, the financial sustainability of CSOs through grants from the ASCS would be more manageable and more efficaciously guaranteed if CSOs are assured the necessary space for consultation and for providing views and opinions regarding key priorities that may guide following open calls. Furthermore, in this sense, concrete legal amendments are necessary in order to provide more appropriate and efficacious opportunities for funding and operation for CSOs, securing for them sustainability pursuant to the fulfillment of their missions, such as:

AHC believes that in order to avoid the interdependence of CSO missions on the calls and orientations of various donors, it would be necessary to conduct a real study in order to see what the main areas of interest are for which CSOs in the country have the appropriate interest and expertise. After that, the ASCS could provide a higher level of funding for some of these priority areas.

Regarding the above, we wish to bring to attention that in Germany, at the start of 2022, the Federal Government approved the Democracy Promotion Acvt draft, which provides a funding program for CSOs that work on democracy, human rights, and the rule of law.<sup>15</sup>

Thirdly, in AHC's evaluation, during the drafting of new policies, best practices followed by countries of the region, which Albania has great similarities with in the social and economic aspect, should be taken into consideration. Since 2017, Bulgaria has seen the implementation of the National Program for the Implementation of Youth Activities, according to article 10a of the Gambling Law, which is a mechanism for funding youth projects as part of the implementation of the national youth strategy, with a budget surpassing 5 million BGN per year. The program's starting point was the existence of negative trends found among youth displaying aggressive behavior and various forms of addiction.<sup>16</sup>

#### 2.4. Decision-making processes

The role of CS in decision-making processes also represents an important element to be taken into consideration as it serves as an important indicator of the level of transparency and democracy. For a more effective and continued development of CS, it is important to support non-government organizations, not only from the financial aspect but also in terms of guaranteeing constructive and non-formal involvement, both by the executive and the legislative. In this aspect, CS actors could contribute to improving draft acts (including draft decisions or draft laws) that are of public interest and that have to do with the rights of citizens sanctioned in the constitution, especially when they envisage the restriction of these rights. Thus, for instance, standing parliamentary committees could encourage the organization of hearing sessions with CS representatives, on issues of a sensitive character that give rise to the need to discuss findings and recommendations produced by the activism of these actors in the field.

<sup>&</sup>lt;sup>15</sup> Civic-Space-Report-2023-European-Civic-Forum.pdf

<sup>&</sup>lt;sup>16</sup> National program for implementation of youth activities under Article 10a of the Gambling Law (nism.bg)

AHC has expressed appreciation for the steps undertaken by the Ministry of Justice for the consultation on various draft acts that affect fields of interest interconnected with CSOs' mission. Also positive are the joint round tables of discussion and consultation organized in the context of the Partnership Platform round tables, where the role and activism of CS actors is considered to be high. The level of participation of actors in some of these mechanisms has been viewed as relatively low and, therefore, it would be appreciated if concrete steps were undertaken to create bridges of communication that create inclusivity. The updated databases harmonized through the CSO Electronic Register, ASCS, and institutional actors with competences for the consultation of draft acts, would guarantee the inclusion of CSO representatives who represent the interests of vulnerable groups, informal citizens' groups, and citizens in rural areas of the country.

Besides engagement in the consultation phase of the process, it is our opinion that in spite of all positive steps and initiatives that have been undertaken, discussions of a mostly formal character and notifications within a short period of time on the agenda of discussions being subjected to consultation remain problematic because they do not allow adequate time to groups of interest for providing quality, written contributions. Meanwhile, as AHC suggested earlier, we reiterate the need that the executive and legislative undertake measures to systematically draft the table of evaluation of the level of implementation of comments/suggestions addressed by stakeholders. Lack of knowledge on the level of implementation of provided suggestions shrinks the participation of organizations periodically, due to limitations in human and financial resources, but also due to the lack of credibility for appropriate analysis and reflection of their participation in this process.

These issues encountered practically by CSOs have been brought to attention also through the positions and recommendations provided by the European Commission, which concretely states, "Public consultation with civil society and interest groups remained formal, including in the context of the National Council on European Integration set up under the auspices of the Assembly. Interaction with NGOs/CSOs and interest groups is happening at formal level, although it could be further intensified and developed into more meaningful exchanges. At present, these interactions on most occasions are overly formalized and due follow up on substance is not always ensured through a sufficiently meaningful dialogue. Particularly when it comes to consultations on new legislative initiatives and processes, NGOs/CSOs and interest groups should be granted greater empowerment and be timely involved to provide meaningful contributions."<sup>17</sup>

Furthermore, article 103 of the Rules of Procedure of the Assembly envisages the provision of written opinions by CSOs when deemed necessary in the case of discussions on annual reports of independent institutions on issues and areas within institutional competence. Pursuant to this provision, during 2021, AHC played a proactive role in providing comments/suggestions after becoming familiar with the draft annual reports submitted to the Assembly in the context of reports

<sup>&</sup>lt;sup>17</sup> European Commission, Screening report Albania, 20/07/2023.

by institutions such as: HJC, HIDAACI, People's Advocate, CRIPDP, CEC, etc.<sup>18</sup> The legal framework appears to grant practical opportunities for cooperation to CSOs to be present in political life and decision-making processes. Nevertheless, the main challenges have to do with the implementation in practice of these legal provisions in force.

#### 2.5 Cooperation at the local level

Various groups or organizations that have more concrete and specific missions on certain communities or territories, in keeping with their needs and interests, reflect an important aspect of the CS sector. In fact, every CSO through its activity would need to exercise a kind of positive impact on public bodies for the purpose of preventing legal violations that may infringe upon citizens' freedoms and rights, and otherwise, the reinstatement of violated rights, and the restriction of further spread of infringement. An engagement of this level by local organizations, especially those of a grassroots level, appears difficult due to the challenges and difficulties that they face, such as limited human resources, financial instability, and diversity of activities adapted to strategies of the donor community. Meanwhile, CSOs that operate with concrete communities, mainly the marginalized and vulnerable ones, or whose activity extends to areas with populations characterized of difficult social-economic conditions, affected by migration and emigration, find it increasingly difficult to operate and undertake long-term initiatives in accordance with their missions.

With the goal of reducing as much as possible the consequences and impact of these challenges and difficulties, it is our opinion that concrete steps should be undertaken to create space for increasing room for building organizations' capacities to recruit human resources with a profile in projects and grant management and fund raising. The need arises for encouraging proactivity and cooperation through the creation of sustainable networking and groupings, which have immediate reaction capacities and authority toward social, cultural, or political developments int eh country. The promotion of the role and activity of these organizations through technological communication methods, periodically, serves positively to creating room for presenting themselves to public authorities, which could facilitate the access and inclusion of organizations in decision-making and legislative processes at the local and central level.

The *brain drain* phenomenon that has affected Western Balkan countries en masse has affected the local civil society sector. Emigration abroad of a part of qualified youth and individuals has already created the provisional practice of remote engagement of youth from the countries where they study or have moved to and settled.

In our country, long-term funding opportunities from Local Government Units have not been envisaged for CSOs. It results that cooperation of Municipalities with CSOs is realized on the basis of public calls published for regional projects, such as ReLoad. An important support for CSOs at the national level, aside from calls for grants by ACSC, is the support provided upon authorization

<sup>&</sup>lt;sup>18</sup> https://ahc.org.al/publikime/oponenca-ligjore/

by the Ministry of Justice for providing primary legal aid guaranteed by the state. In March of this year, AHC provided a series of comments regarding the draft decision "On some additions and amendments to decision no. 55, dated 06.02.2019, of the Council of Ministers "On the establishment of procedures and documentation for the authorization of non-profit organizations that provide legal aid guaranteed by the state."<sup>19</sup> AHC has recommended that the Director for Free Legal Aid take into consideration the submission of requests for authorization by mail, not excluding the continuation of the process to complete documentation for responsible public bodies. It was also suggested to envisage concrete deadlines regarding the provision of relevant services by the NAIS to access the e-Albania government platform.

At the local level, we consider that it would be necessary for local government units to take concrete measures in order to hold periodical cross-sector meetings with CSO representatives, religious communities, media, institutional actors, in order to promote activities and the role of informal groups, create and strengthen bridges of cooperation and coordination with informal citizens' groups, in order to discuss concerns, challenges, obstacles, as well as social causes that are suggested for further follow up.

<sup>&</sup>lt;sup>19</sup> By letter no. Prot. 147, dated 06.03.2024.

#### **3. RECOMMENDATIONS**

- We suggest that the Tirana Judicial District Court and the HJC take measures to make functional the National Electronic Register of CSOs as the delay of about three months from the decision to establish it affects the economy and efficacy of procedures envisaged for NPOs to follow.

- Furthermore, AHC recommends to the HJC to take measures to reflect the necessary amendments to the sample form for suspending requests for registration, in accordance with article 29 of law no. 80/2021, because the phrase "chancellor" has been invalidated by the Constitutional Court through decision no. 62, dated 20.11.2023.

- We recommend the taking of measures by the Assembly of the RA for the amendment of law no. 119/2015, for the purpose of addressing in a more complete and inclusive manner CS needs, such as the need to change the number of representatives in the NCSC toward an increasing trend, fully guaranteeing transparency through the systematic publication of opinions and taken decisions. In this context, we suggest approving necessary amendments as there should be a greater number of civil society representatives compared to those from public institutions, who may express their views and recommendations through relevant ministries, without the need to be part of the NCSC structure.

- We suggest to the Assembly of the Republic of Albania to take measures to develop and update transparency mechanisms, as well as identify appropriate forms that are easily accessible to guarantee effective interaction with civil society. Monitoring the deadlines established in the Assembly's Rules of Procedure, envisaged in guaranteeing the time necessary for groups of interest that have submitted lawmaking initiatives or petitions to the Assembly, would help serve efficacious and quality review of such submissions by the relevant parliamentary committees.

- Further strengthening the role of the standing thematic group of civil society at the Committee on European Integration would have a positive impact on the Assembly's legislative processes. In this practice, we suggest creating room for the establishment of standing thematic groups also at other standing Committees of the Assembly, in order to include civil society sector representatives in a more systematic manner with concrete contributions for the lawmaking power.

- We recommend to NCSC and ACSC to take concrete measures in order to update the official websites of these bodies that are important for the civil society sector, so that they are enriched in real time with minutes and decision-making of meetings, and draft objective work plans for further follow-up of concrete recommendations brought in meetings.

- In respect of article 4 of law no. 119/2015, we suggest to the Council of Ministers to take measures for the publication of substantial recommendations resulting from NCSC meetings, in order to functionally guarantee transparency.

- In order to expand the circle of subjects applying for ACSC's granting scheme, we suggest that the Assembly take measures to amend article 4, law no. 10093, dated 09.03.2009. The inclusion

of informal groups as beneficiary support subjects, in our opinion, would serve positively to building their capacities and to empowering their role and activity toward promoting and supporting important social causes.

- We suggest to local government bodies to take measures to create joint cooperation plans with local CSOs. Holding systematic joint meetings with NCSC and local government representatives, in our opinion, would have a positive impact on addressing the NCSC recommendation from the meeting of 24.04.2023, to discuss about the necessary space for funding in infrastructure. Measures taken to promote the missions of CSOs with expertise, stability, and sustainable and broad involvement at the national level, in our opinion, would serve to the creation of positive and inspiring examples for local governments as well.