

Mr Ion JINGA
Ambassador Extraordinary and
Plenipotentiary
Permanent Representative of Romania
to the Council of Europe

Ref ► CINGO/Pres/Romania

Strasbourg, 28 May 2026

Dear Ambassador,

As you know, the Conference of INGOs follows the situation of democratic participation and the civic space in Europe through its ad hoc country visits and dedicated task force, and through its Expert Council on NGO Law regarding specifically the evolution of the legal framework related to Freedom of Association in Council of Europe member States.

Our international and national partners have drawn our attention to the submission to the Romanian Parliament of a legislative proposal (L233/2026) to amend Government Ordinance No. 26/2000 on associations and foundations.

The proposed amendments would impose a general obligation on all non-governmental organisations to submit annually a declaration regarding all revenues and sources of funding from the previous year, irrespective of their origin, including the identification details of natural persons (for amounts exceeding 5,000 lei) and of legal persons (for any amount). This new requirement is being proposed despite the fact that State institutions in Romania already obtain this information in a variety of ways, notably through requirements concerning annual accounts, access to the accounting database of organisations and information about cross-border transfers. They also possess all the legal powers necessary to act in the event of any possible illegal conduct then being identified. Any non-compliance with this additional requirement would then lead, in the first instance, to the automatic suspension of the activities of the organisation concerned and then its dissolution after the lapse of a year.

The unnecessary, arbitrary and disproportionate nature of the proposals – as well as the potential for organisations complying with the requirement to make a declaration and thus to be stigmatised on account of the source of some of their funding – runs counter to both the right to respect for private life and the right to freedom of association under Articles 8 and 11 of the European Convention on Human Rights.

Having regard to the foregoing, we sincerely hope that appropriate consideration will be given by the Romania Parliament to the obligations of Romania under the European Convention in its examination of the legislative proposal and that this will lead to its conclusion that its adoption should not be pursued.

We would be grateful to remain informed of any future decision and/or development on this matter.

Yours sincerely,

Gerhard Ermischer
President of the Conference of INGOs

A handwritten signature in cursive script, reading "Gerhard Ermischer".

Jeremy McBride
President of the Expert Council on NGO
Law of the Council of Europe

A handwritten signature in cursive script, reading "M. Jeremy McBride".