

Ms Oľga ALGAYEROVÁ  
Ambassador Extraordinary and  
Plenipotentiary  
Permanent Representative of the Slovak  
Republic to the Council of Europe

Ref ► CINGO/Pres/Slovak Republic

Strasbourg, 4 June 2025

Dear Ambassador,

As you know, the Conference of INGOs through its Expert Council on NGO Law, follows the evolution and implementation of the legal framework related to Freedom of Association in Council of Europe member States.

We should herewith like to share with you an addendum that the Expert Council has just adopted, to complement an opinion prepared earlier this year on the then draft amendments to your country's framework regulation governing non-governmental organisations which aimed at introducing the Concept of "Foreign Supported Organisations".

Between the first and second readings of the draft amendments, the ruling coalition considered various proposals to further revise those amendments, aiming to address major concerns raised by NGOs, the European Commission, and the Council of Europe. These proposals ultimately abandoned the concept of "foreign-supported organisations" and the subsequent initiative to label NGOs that are perceived to influence politicians - either directly or indirectly - as "lobbyists", despite the lack of a general legal framework for lobbying. The latter proposal would have introduced various administrative requirements for non-governmental organisations and granted the Ministry of the Interior the authority to dissolve them for administrative errors.

This is to be welcome. However, it has been further noted that the final amendments adopted on 16 April 2025 introduce new reporting and disclosure requirements - a "transparency statement" - for NGOs concerning their sources of financing (foreign and domestic alike) as well as penalties for non-compliance. Although these differ in scope and substance from the draft approved by Parliament in the first reading, the issues of non-compliance with European standards persist both in terms of the process and substance. These two opinions of January and May 2025, which have been posted on, and can be downloaded from CINGO's website<sup>1</sup>, are appended to this letter for your convenience.

<sup>1</sup> At [https://www.coe.int/en/web/ingo/expert-council#{%22279765906%22:\[12\]}](https://www.coe.int/en/web/ingo/expert-council#{%22279765906%22:[12]})

The Conference of INGOs would herewith like to encourage the Slovak authorities to give further consideration to addressing the identified weaknesses.

It also invites the Slovak authorities to share any comments they may have, by 30 September 2025. The information will be brought to the attention of CINGO's forthcoming general assembly (public part-session) which will be held in Strasbourg on 13-15 October 2025. According to CINGO's standing practice, members of the Permanent Representations are invited to attend that public part-session.

Yours sincerely,

Gerhard Ermischer  
President of the Conference of INGOs

Jeremy McBride  
President of CINGO's Expert Council on  
NGO Law



**Annexes:**

- Addendum to the Opinion on the Draft Amendments to the Slovak Republic's Framework Regulation Governing Non-Governmental Organisations Introducing the Concept of "Foreign Supported Organisations" (May 2025) ([in English](#))
- Opinion on the Draft Amendments to the Slovak Republic's Framework Regulation Governing Non-Governmental Organisations Introducing the Concept of "Foreign Supported Organisations" (January 2025) ([in English](#))