



Civil participation in the decision-making process

First fact finding visit to Denmark

11-13 May 2026

Report

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INTRODUCTION

1. The Conference of International Non-Governmental Organisations of the Council of Europe (CINGO) is the representative body of international non-governmental organisations (NGOs) that enjoy participatory status with the Council of Europe.¹ As part of its mandate, CINGO conducts fact-finding visits to the Council of Europe member states.
2. During a fact-finding visit CINGO strives to hear the points of view of both NGOs and public authorities, in order to: identify critical issues in the legal and institutional framework related to participatory democracy and its implementation; establish what use is made of the pertinent instruments of the Council of Europe; and how the work of the Council of Europe in this field can be further advanced.
3. The instruments of the Council of Europe pertinent to participatory democracy include: Article 11 of the [European Convention on Human Rights](#) (the European Convention); [Recommendation Rec\(2003\)3 of the Committee of Ministers to member states on balanced participation of women and men in political and public decision making](#); the [Code of Good Practice for Civil Participation in the Decision-Making Process](#) (the Code of Good Practice); [Recommendation CM/Rec\(2007\)14 of the Committee of Ministers to member states on the legal status of non-governmental organisations in Europe](#) (Recommendation CM/Rec(2007)14); [the Joint OSCE/ODIHR Venice Commission Guidelines on Freedom of Association](#); the [Guidelines of the Committee of Ministers for civil participation in political decision making](#) (CM(2017)83); [Recommendation CM/Rec \(2018\)4 of the Committee of Ministers to member States on the participation of citizens in local public life](#); and [Recommendation CM/Rec\(2018\)11 of the Committee of Ministers to member States on the need to strengthen the protection and promotion of civil society space in Europe](#).
4. The definition of NGOs that applies to CINGO's activities is the one used in Recommendation CM/Rec(2007)14, namely, as "voluntary self-governing bodies or organisations established to pursue the essentially non-profit-making objectives of their founders or members. They do not include political parties".²
5. In the context of this report, civil (citizen) participation in policy decision-making is considered as embracing the associated rights to freedom of peaceful assembly and association, freedom of expression, petition and access of information of public significance.

¹ [Conference of INGOs - Homepage - Conference of INGOs](#)

² Paragraph 1.

6. Following a country visit, a report is prepared which highlights the important and sometimes critical (socio-economic and political) issues identified in meetings with representatives of NGOs and the respective public authorities and other public agencies of the host member state. The report concludes with recommendations as to how to address those critical issues, taking into account the international standards instrumental to the right to civil participation in policy decision-making.
7. CINGO provides the permanent representative from the member state concerned with an advance copy of the report and invites her/him to participate in the discussion of it at the General Assembly. It subsequently publishes both the report and any comments by the member state on its website.
8. CINGO held an official visit to Denmark on 11-13 May 2026. The objectives of the visit were to examine the legal and practical conditions under which civil society organisations operate in Denmark; to assess opportunities for civic participation in public decision-making; and to identify current challenges affecting civic space.
9. The visit was facilitated by our partner, Nyt Europa (New Europe), which were responsible for the logistics and organisation of meetings with relevant stakeholders. Meetings were organised with NGOs active across a broad range of human rights and public interest fields, including gender equality between men and women and the rights of LGBT+ persons, anti-discrimination, disability rights, minority rights, Indigenous peoples' rights, children's rights, environmental and climate advocacy, development cooperation, humanitarian action, youth participation, adult education, social and health services, digital rights, freedom of expression, and democracy. Particular thematic discussions focused on structural challenges affecting civil society, including registration, financing, access to public funding, participation in decision-making processes, racism and discrimination, the rise of anti-gender narratives, and the ability of civil society organisations to engage effectively with public authorities and the political system.
10. The programme also included meetings with representatives of the executive and legislative branches, including officials from several ministries and members of the Danish Parliament, as well as with representatives of municipalities, private philanthropic foundations, academia, the Danish Institute for Human Rights, the Danish Bar and Law Society, the judiciary and umbrella organisations, in order to obtain a comprehensive overview of the legal, policy and institutional environment in which civil society operates in Denmark.

11. The delegation of CINGO was composed of Gerhard Ermischer, President of CINGO, Simona Constantinescu, member of CINGO's Expert Council on NGO Law, Ruth Allen and Anna Sevortian, members of CINGO's Standing Committee.
12. The findings contained in this report are based on meetings held during the country visit, written submissions provided by participating organisations, Danish legislation, publicly available policy documents and reports prepared by national and international organisations. Particular consideration was given to documentation supplied by Danish civil society organisations during and after the visit, including examples illustrating practical challenges encountered in recent years.
13. By its very design, the report does not necessarily provide a detailed account of all the issues discussed therein. Rather, its purpose is to determine the general state of affairs with respect to those issues. It focuses first on the legal and institutional framework applicable to the establishment and functioning of NGOs and consultation with them, together with its implementation in practice. It then deals with the actual environment in which NGOs operate, including the contextual framing, the provision of funding and the extent to which hostility to and attacks on NGOs go unchallenged. The conclusions of the visit are summarised and a number of recommendations made to assist greater alignment of law and practice relating to NGOs with European standards.
14. The report is intended as a constructive contribution to ongoing dialogue between Danish authorities, civil society organisations and the Council of Europe. Its purpose is not to rank or compare member States, but to identify strengths, emerging challenges and opportunities for further strengthening the enabling environment for civil society in Denmark.

CIVIL SOCIETY IN DENMARK

15. The relationship between public authorities and civil society has historically been characterised by a high degree of mutual trust and institutional cooperation. Public authorities frequently rely on civil society organisations as partners in policy design, service delivery and community development, while organisations themselves have generally enjoyed broad political legitimacy across the ideological spectrum. Public funding has traditionally been regarded as a mechanism to strengthen civil society rather than to direct or control it. Similarly, municipalities have long played an important role in supporting voluntary organisations through grants, access to premises and local partnerships. The relationship between public authorities and civil society reflects a specific historic development of Danish democracy, which is very much built on a mutual trust and finding

consensual solutions in a multi-party system. It grants a higher authority to the parliament than in most European democracies while it relies less on a system of checks and balances, especially of an independent judiciary to which citizens as well as civil society organisations can recur. This high trust system can be viewed as a strength, but it also has its weaknesses (as we already could see in a similar situation in Finland). It is a “good weather” system, which works well in a small and rich country with a firm tradition, but it is not prepared for rougher times. During our visit we could see (and will describe further down) that some worrying signals are visible in Denmark as in all of Europe and globally which give rise to concern. We have therefore included some suggestions for improvement in our recommendation at the end of this report.

16. The Danish civil society landscape is highly diverse. It encompasses organisations engaged in social welfare, health, education, sports, culture, international development, environmental protection, humanitarian assistance, disability rights, gender equality, migrant integration, children's rights, consumer protection, youth participation, democracy promotion and human rights advocacy. Alongside large professional organisations operating nationally, Denmark continues to benefit from a rich network of local voluntary associations supported by active citizen participation.
17. Denmark is estimated to have approximately 100,000 voluntary associations³. Because registration is not constitutive for ordinary associations, no official statistics exist concerning the total number of legally existing associations or the proportion that have obtained a Central Business Register (CVR) number.
18. Nevertheless, several interlocutors observed that the traditionally close and trust-based relationship between public authorities and civil society has become more complex in recent years. While cooperation remains extensive, organisations pointed to changes in funding practices, increasing administrative and performance requirements, and a more polarised public and political debate. These developments were generally described as emerging challenges within an otherwise favourable environment for civil society, rather than as changes to the legal framework itself, and are examined in greater detail in the following sections of the report. This overall assessment is broadly consistent with CIVICUS Monitor, which continues to rate civic space in Denmark as “Open”.⁴

THE LEGAL FRAMEWORK AND ITS IMPLEMENTATION

³ The Danish Ministry of Foreign Affairs curated webpage: <https://denmark.dk/society-and-business/associations/>

⁴ CIVICUS Monitor, *Denmark*, current civic space rating: “Open” (89/100): <https://monitor.civicus.org/country/denmark/>

19. Freedom of association is guaranteed by Section 78 of the Constitution, which provides that citizens are entitled, without prior permission, to form associations for any lawful purpose. The Constitution further stipulates that associations pursuing unlawful objectives or seeking to achieve their aims through violence or similar unlawful means may be dissolved only pursuant to a judicial decision. This constitutional protection reflects a long-standing commitment to organisational autonomy and limits government interference with civil society.
20. The Constitution also protects freedom of expression (Section 77), freedom of peaceful assembly (Section 79) and broader principles of democratic participation. These constitutional guarantees are complemented by Denmark's obligations under the European Convention on Human Rights, which forms part of Danish law through the Human Rights Act of 1992.
21. Unlike many Council of Europe member States, Denmark has not adopted a comprehensive law governing associations or non-governmental organisations. Ordinary voluntary associations are primarily governed by constitutional guarantees, general principles of contract and private law, and sector-specific legislation where relevant. This legislative approach reflects the historical development of Danish civil society and the principle that associations should enjoy broad autonomy unless specific regulatory considerations justify statutory intervention.
22. Foundations are subject to a distinct legal framework and are supervised by the Danish Business Authority or other competent authorities depending on their legal status and activities. Similarly, organisations carrying out economic activities or operating as legal entities in specific regulated sectors may become subject to additional statutory requirements concerning accounting, taxation, employment or financial reporting. These sector-specific obligations generally reflect the nature of the activities undertaken rather than the advocacy or policy positions adopted by organisations. While foundations may fall within the broader concept of non-governmental organisations under Recommendation CM/Rec(2007)14, their specific legal and regulatory framework was not examined during the visit and is therefore outside the scope of this report.

Formation

23. Although Danish law does not prescribe a formal incorporation procedure for ordinary associations (*foreninger*), an association is generally understood to come into existence once a group of persons (minimum two) adopts statutes, agrees on a lawful common objective(s)

and establishes an organisational structure with governing bodies. An association is also expected to maintain its finances separately from the personal finances of its members. No prior administrative authorisation is required, nor is there any general approval procedure by public authorities.

24. Registration is not constitutive for the exercise of freedom of association. However, it becomes necessary where an organisation wishes to acquire certain legal or practical capacities, including opening a bank account, employing staff, entering into contractual relationships or receiving public funding. In practice, many organisations therefore register voluntarily through the Danish Central Business Register⁵ (CVR)
25. Smaller local associations operating solely through volunteers may exist indefinitely without obtaining a CVR number. The CVR number functions as an administrative identifier rather than as a condition for the existence or legal validity of the association.
26. Interlocutors informed the delegation that the practical process of registration is generally straightforward, rapid and inexpensive. No concerns were expressed regarding arbitrary refusals of registration or politically motivated obstacles to establishing organisations.
27. Dissolution of ordinary voluntary associations in Denmark is primarily voluntary, being decided by the members in accordance with the association's statutes. Danish law does not provide for a general administrative power to dissolve lawful associations. Public authorities may withdraw funding, tax benefits or recognition under specific statutory schemes, but such measures do not terminate the legal existence of the organisation. Pursuant to Section 78 of the Danish Constitution, associations pursuing unlawful purposes or seeking to achieve their objectives through violence may be dissolved only by a judicial decision. Rare cases of the dissolution of associations are reported (the gang-based groups Loyal to Familia in 2021 and more recently Bandidos in October 2025, in cases involving serious criminality and unlawful purposes).⁶

⁵ Central Business Register (CVR) - despite its name, it is Denmark's central register of registered legal entities, not merely a register of commercial businesses. It contains much more than commercial companies. It also includes: foundations, many associations, public authorities, municipalities, churches and religious communities, other registered legal entities.

⁶ Monitoring Action for Civic Space Country Report, 2025: Denmark: <https://ecnl.org/sites/default/files/2026-02/Denmark%20MACS%20Country%20Report%202025.pdf>

Operation

28. Several participants nevertheless observed that recent developments in European anti-money laundering legislation are likely to affect the practical operation of newly established organisations. Although these requirements originate primarily from European Union legislation rather than Danish policy, compliance obligations concerning beneficial ownership, customer due diligence and banking procedures have become increasingly relevant for voluntary organisations, particularly associations operating internationally. Several organisations indicated that access to banking services has become more complex, especially for organisations working with partners in conflict-affected or high-risk jurisdictions. These concerns mirror developments reported elsewhere in Europe and illustrate the unintended consequences that financial regulation may have for legitimate civil society activities. During the meeting with representatives of the ministries, the delegation was informed that efforts are underway to simplify the application of anti-money-laundering requirements to associations, although no further details were available at the time of the visit.
29. Danish law affords civil society organisations extensive autonomy in determining their internal governance structures. Subject to general principles of law and the organisations' own statutes, associations remain free to regulate matters such as membership, governing bodies, voting procedures, elections, decision-making processes and organisational objectives. Public authorities possess no general competence to supervise internal governance or to intervene in organisational decisions solely on the basis of disagreement with an organisation's policies or activities.
30. Most associations adopt statutes regulating membership rights, the composition of governing bodies, general assemblies, financial management and procedures for amending organisational rules. These matters are largely governed by private law rather than detailed statutory provisions. This flexibility enables organisations of widely differing size, purpose and structure to adopt governance arrangements appropriate to their own activities.
31. The delegation found no evidence of legal restrictions concerning the nationality or residence of board members or founders of ordinary associations. Similarly, no general legal provisions prohibit organisations from engaging in advocacy or public campaigns.
32. The delegation also notes a positive recent policy development. In August 2025, the Danish Government presented an initiative to reduce administrative burdens for volunteer

associations and strengthen civil society.⁷ Building on recommendations developed in consultation with stakeholders, the proposal comprises 30 initiatives aimed at simplifying financial administration, reducing documentation requirements, improving cooperation between associations, banks and municipalities, and creating a more enabling framework for voluntary engagement. The initiative reflects the Government's recognition that excessive administrative requirements may divert time and resources away from the core activities of civil society organisations. Although implementation remains ongoing, the proposal has generally been welcomed by civil society organisations as an important step towards reinforcing the enabling environment for voluntary associations.

33. Consequently, no single public authority exercises general supervisory powers over all civil society organisations. Oversight is instead dispersed among different authorities depending on the legal activities undertaken by individual organisations. Financial reporting, taxation, charitable status, foundations, fundraising and public grants are each governed by their respective legislative frameworks. This decentralised approach contributes to organisational flexibility while avoiding excessive administrative regulation.

Political activities, advocacy and the role of civil society

34. Danish law does not impose general restrictions on the political or advocacy activities of civil society organisations. NGOs are free to engage in public policy advocacy, promote legislative reform, participate in public consultations, organise public campaigns, and criticise government policies as part of the exercise of the freedoms of expression and association. These activities are consistent with Council of Europe standards, notably Recommendation CM/Rec(2007)14 on the legal status of NGOs in Europe, which recognises advocacy and participation in public debate as legitimate functions of civil society organisations, as well as Recommendation CM/Rec(2018)11 on the need to strengthen the protection and promotion of civil society space. The principal legal limitation concerns direct participation in electoral campaigning and political party financing, which are governed by the legal framework applicable to political parties.
35. Nevertheless, a recurring concern raised during the visit was the perceived shift in the understanding of what constitutes "political activities" by civil society organisations. Several interlocutors observed that activities traditionally recognised as legitimate forms of civic participation such as public policy advocacy, public campaigning and criticism of government policies are increasingly portrayed as inappropriate or unduly political particularly when they concern issues that have become sensitive or contested in public debate. Examples

⁷ <https://danishnews.cphpost.dk/article/1adfe5af-9ea9-4b46-b708-75a17ba2f8ae>;

mentioned during the visit included the situation in Gaza and the wider Israeli-Palestinian context, migration and LGBT+ rights, and issues concerning the rights and situation of ethnic and religious minorities, particularly Muslim communities in Denmark. Some interlocutors also referred to recent political debates concerning the interpretation of international human rights standards, including Denmark's participation in a joint letter by nine European states concerning the European Convention on Human Rights⁸, as part of the broader environment in which civil society organisations engage in human rights advocacy.

36. The delegation was also informed of concerns about the potential chilling effect of the citizenship framework on freedom of expression and civic participation among non-citizen residents. Applicants for Danish citizenship are required to declare their allegiance and loyalty to Denmark and Danish society and their respect for fundamental Danish values and legal principles, including Danish democracy.⁹ In individual cases, the Danish Parliament's Naturalisation Committee (*Indfødsretsudvalget*) has also scrutinised applicants' public statements and social-media activity. In December 2024, selected citizenship applicants were invited to appear before the Committee to discuss their views on "Danish values", including freedom of expression, equality and the relationship between religion and law, following questions arising from their social-media posts.¹⁰

More recently, the Government established an expert group to examine the possibility of screening citizenship applicants for anti-democratic views, including through their activity on social media.¹¹ Against this background, some interlocutors expressed concern that the

⁸ <https://stm.dk/presse/pressemeddelelser/2025/statsministeren-og-italiens-premierminister-i-aabent-brev-vi-skjal-kigge-paa-konventionerne/>

⁹ Danish Ministry of Immigration and Integration, *Afgivelse af erklæring om troskab og loyalitet* [Declaration of allegiance and loyalty]. The declaration required in the naturalisation process includes an undertaking to respect Danish legislation, including the Constitution, and "fundamental Danish values and legal principles, including Danish democracy" (<https://uim.dk/statsborgerskab/udenlandske-statsborgere/betingelser/afgivelse-af-erklæring-om-troskab-og-loyalitet>)

¹⁰ Danish Parliament, Naturalisation Committee, L 63, Annex 5, 2024–25, *Invitation til samtale med Folketingets Indfødsretsudvalg angående ansøgning om statsborgerskab*. The invitation states that a majority of the Committee wished to discuss selected applicants' views on "Danish values", including freedom of expression, equality and the relationship between religion and law, after the Committee became aware of social-media posts that had raised questions. See also Danish Parliament, L 217, Question No. 155, 15 May 2025, concerning an individual applicant's Facebook statements, including statements relating to Palestine and Gaza, and their alleged incompatibility with the fundamental Danish values expected for naturalisation (<https://www.ft.dk/samling/20241/lovforslag/L63/bilag/5/2942125/index.htm> and <https://www.ft.dk/samling/20241/lovforslag/l217/spm/155/index.html>).

¹¹ Danish Parliament, Naturalisation Committee, Annex 275, 2024–25, *Terms of reference for the expert group on screening citizenship applicants*. The expert group was tasked with examining the legal, technical and practical feasibility of screening applicants for anti-democratic expressions and views contrary to fundamental freedoms and human rights, including through social-media activity. The terms of reference contemplate, inter alia, expressions, symbols, "likes" and other reactions, images and videos, religious references, links with certain organisations or

possibility of public expression on politically sensitive issues being taken into account in the naturalisation process may encourage self-censorship among non-citizen residents, particularly in relation to highly contested issues such as the Israel-Palestine conflict, with possible indirect consequences for their participation in civil society organisations and advocacy activities.¹²

37. Although the delegation did not identify explicit legal restrictions on such activities, organisations from different sectors reported a growing perception that these activities are being indirectly discouraged through conditions attached to public funding and, in some cases, through reduced opportunities to engage with political decision-makers and decision-making processes. Several interlocutors further indicated that organisations receiving public funding are increasingly expected to focus on supporting the implementation of government policies and programmes, rather than independently scrutinising, challenging or seeking to influence them. According to these organisations, this development risks blurring the distinction between an independent civil society and organisations acting primarily as service providers or implementing partners of public authorities.

38. In this context, the transparency of public funding decisions is particularly important for preserving both the independence of civil society organisations and confidence that their advocacy positions do not influence access to public support. During meetings with Members of Parliament, the delegation was informed that funding allocated through the annual Budget Act is distributed through political decisions. At the same time, there is no comprehensive integrity framework regulating lobbying and other third-party contacts with MPs, including requirements for the disclosure of such meetings. While these are distinct issues, the absence of such safeguards may reinforce perceptions of discretion in funding decisions. The introduction of more transparent and competitive allocation mechanisms has been raised in isolated discussions, but the delegation did not identify any concrete legislative or policy initiative to pursue such a reform at the time of the visit.

groups and participation in particular activities
<https://www.ft.dk/samling/20241/almdel/IFU/bilag/275/3065788/index.htm>

¹² See, in this context, *Arbejderen*, “Minister måtte se udvisningstruet efter Gaza-solidaritet i øjnene under samråd”, 9 May 2025. The article reports the case of a woman prosecuted for alleged public approval of terrorism following a Facebook comment concerning the Israel-Palestine conflict. She was acquitted at first instance and the prosecution appealed. In parallel, the authorities reopened the question of whether she had been correctly registered as a Danish citizen. During a hearing of the Parliamentary Naturalisation Committee, concern was expressed that the circumstances of the case could discourage persons with an immigrant background from exercising their freedom of expression and participating in public debate; the Minister rejected the suggestion that persons would refrain from participating for this reason (<https://arbejderen.dk/indland/minister-maatte-se-udvisningstruet-efter-gaza-solidaritet-i-oegnene-under-samraad/>).

39. Several interlocutors therefore considered that greater transparency in the allocation of public funding, based on objective criteria, reasoned decisions and effective mechanisms for review, including judicial review where appropriate, would strengthen public confidence in the fairness and independence of public support for civil society organisations.
40. The delegation further notes that Danish law does not recognise a general *actio popularis* or a general right for civil society organisations to bring public interest litigation. Outside specific areas where legislation expressly confers standing, most notably in environmental matters pursuant to the Aarhus Convention and its implementing legislation, organisations generally require a *sufficient legal interest*¹³ to bring proceedings before the courts. Several interlocutors considered that broader opportunities for public interest litigation could strengthen the role of civil society in protecting rights, promoting accountability and defending the public interest.
41. Finally, several interlocutors referred to the absence of specific procedural safeguards against Strategic Lawsuits Against Public Participation (SLAPPs). The delegation notes that Denmark is not bound by Directive (EU) 2024/1069 because of its Justice and Home Affairs opt-out under Protocol No. 22 to the Treaties. Nevertheless, the Council of Europe Committee of Ministers Recommendation CM/Rec(2024)2 on countering the use of Strategic Lawsuits Against Public Participation (SLAPPs)¹⁴ provides an important European benchmark in this field. The delegation therefore encourages the Danish authorities to consider implementing the safeguards set out in that Recommendation. Introducing appropriate procedural measures against abusive litigation targeting journalists, human rights defenders and civil society organisations would further strengthen the enabling environment for civic participation, freedom of expression and democratic debate.

PUBLIC PARTICIPATION AND CONSULTATION

42. Denmark has a long-established tradition of consulting stakeholders during the preparation of legislation. Public consultation is governed primarily by the Ministry of Justice's Legislative Quality Guidelines (*Lovkvalitetsvejledningen*).¹⁵ As a general rule, ministries should submit

¹³ The concept of “sufficient legal interest” is not expressly defined in Danish legislation and its interpretation is therefore determined by the courts through case law. According to interlocutors, the courts have traditionally taken a relatively restrictive approach to its interpretation.

¹⁴[https://search.coe.int/cm/#{%22CoEIdentifier%22:\[%220900001680af2805%22\],%22sort%22:\[%22CoEValidationDate%20Descending%22\]}](https://search.coe.int/cm/#{%22CoEIdentifier%22:[%220900001680af2805%22],%22sort%22:[%22CoEValidationDate%20Descending%22]})

¹⁵ <https://lovkvalitet.dk/>

draft laws (*lovforslag*) to public consultation before they are introduced in the Parliament. There is no statutory consultation period under Danish law.

43. The Guidelines recommend that consultation be carried out on the draft law accompanied by the explanatory notes, for a period of at least four weeks, unless exceptional circumstances justify a shorter period or no consultation at all. Following the consultation, the responsible ministry prepares a consultation report summarising the comments received, presenting the ministry's assessment of the principal observations made during the consultation and explaining any amendments introduced into the draft bill. The consultation report is transmitted to the Parliament and is publicly available.
44. Transparency is reinforced through the Government's central online consultation portal (Høringsportalen), which publishes all draft legislation subject to Parliament debate and adoption together with the relevant documents in the consultation process such as the inputs received during the consultation and the comments/ answers of the ministries.
45. Any interested person or organisation may submit comments during the consultation period, even if not specifically invited by the responsible ministry. Although there is no annual report assessing the operation of the consultation system or providing statistical information on the number of consultations, participants or consultation outcomes, information may be found on a case-by-case basis through the Høringsportalen itself.
46. The consultation framework extends beyond draft laws of Parliament. Separate guidance issued by the Ministry of Justice governs public consultation on draft administrative regulations (*bekendtgørelser*) prepared by ministries and central government authorities under delegated legislative powers. These draft regulations are, as a general rule, also subject to public consultation and published through the Høringsportalen together with the relevant consultation documents.
47. The Ministry of Justice's guidance does not, however, establish a general consultation framework applicable to municipalities or other local authorities. Consultation at local level is instead regulated by sector-specific legislation or local administrative practice. The municipalities generally publish consultations through their own websites or engage with permanent advisory bodies (e.g. disability, senior, youth, or volunteers councils).
48. Denmark therefore does not operate a single national portal through which interested persons may systematically monitor consultations organised by local authorities. While this reflects the country's tradition of local self-government, it may also make it more difficult for civil society organisations operating nationwide to identify consultation opportunities and

varying approaches to civil society engagement and resourcing across different municipalities.

49. The Danish consultation system is primarily based on written consultation. Unlike the legislation of certain Council of Europe member States, Danish law does not establish a general right for civil society organisations or citizens to require the competent authority to organise a public hearing or another form of oral consultation. Ministries and/ or parliamentary committees may organise meetings with stakeholders and experts or online consultations if considered appropriate but these forms of participation remain discretionary rather than mandatory.
50. During the visit, civil society organisations nevertheless reported that ministries frequently engage with stakeholders through informal meetings and working groups before the formal consultation stage. This early dialogue is widely regarded as one of the strengths of the Danish policymaking process and often enables organisations to contribute while legislative proposals are still under preparation. However, there does not appear to be a systematic mechanism for publicising opportunities to participate in such meetings or for making transparent which organisations and other stakeholders have been involved. Interlocutors also indicated that, in some cases, important elements of a legislative proposal may already be discussed and effectively agreed during these informal exchanges. Where this occurs, the subsequent formal consultation may have more limited scope to influence the substance of the proposal. Consideration could therefore be given to further enhancing the transparency and inclusiveness of these informal channels and their relationship with the formal consultation process.
51. Several interlocutors nevertheless identified areas where the consultation process could be strengthened. Although written consultations are systematic and fairly transparent, some organisations considered that consultations increasingly take place after the Government has already reached its principal policy decisions, thereby limiting opportunities to influence the overall direction of legislative proposals. Concerns were also expressed regarding the growing use of shortened consultation periods, including consultations overlapping with holiday periods, claiming emergency or politically sensitive legislation, and the increasing technical complexity of draft legislation, which may place smaller organisations relying largely on volunteers at a disadvantage.
52. These concerns are consistent with findings from other recent assessments of the Danish legislative process. The European Commission's 2026 Rule of Law Report considers the legislative process to remain inclusive overall, while noting that, of 175 public consultations conducted since the previous reporting period, 24 were shorter than the recommended four-

week period. The Commission also recorded stakeholder concerns regarding the extent to which feedback received through public consultations is reflected in the legislative process.¹⁶ Similar concerns regarding short or ill-timed consultation periods, incomplete consultation lists and the timing and effectiveness of stakeholder involvement have been documented by Justitia, the Danish Bar and Law Society and civil society monitoring initiatives.¹⁷

53. The delegation also notes that the Danish consultation framework differs from systems based on detailed statutory procedural guarantees as it relies primarily on administrative guidance, political accountability and a long-standing culture of dialogue between public authorities and organised civil society. No specific legal sanctions are established where consultation requirements are not fully respected. Failure to comply with the Guidelines on consultation does not affect the validity of the resulting legislation, nor do Danish courts generally review the adequacy of the consultation process as a ground for invalidating an act of the Parliament. The principal safeguards are therefore political rather than judicial, consisting primarily of parliamentary scrutiny, public transparency, stakeholder criticism and, where appropriate, review by the Parliamentary Ombudsman of the administrative conduct of public authorities.

Participation of Greenland¹⁸ and its institutions

54. Greenlanders are Danish citizens and therefore enjoy the same constitutional rights as other citizens to participate in public consultations, establish associations and engage in public debate. In addition, the Greenland Self-Government Act requires the Danish Government to consult the Greenland Self-Government authorities on draft legislation and administrative regulations that apply to, or are of particular importance to, Greenland. This mechanism provides an important institutional safeguard by ensuring that Greenlandic authorities

¹⁶ European Commission, [2026 Rule of Law Report – Country Chapter on the rule of law situation in Denmark](#)

¹⁷- Justitia, [Udfordringer i lovgivningsprocessen](#) [Challenges in the Legislative Process], July 2024;

- Danish Bar and Law Society (*Advokatsamfundet*), [“Tema: Lovkvaliteten daler”](#), *Advokaten*, 2023;

- European Center for Not-for-Profit Law (ECNL)/Nyt Europa, [Monitoring Action for Civic Space – Country Report 2025: Denmark](#), 2026;

- Civil Liberties Union for Europe, [Liberties Rule of Law Report 2026 - Denmark](#).

These assessments identify, to varying degrees, concerns regarding short or ill-timed consultation periods, the inclusion of relevant stakeholders, and the ability of organisations with limited administrative capacity to participate effectively.

¹⁸ The delegation recognises that the Faroe Islands, like Greenland, form part of the Kingdom of Denmark and enjoy extensive self-government. Given the particular attention devoted to Greenland in the period surrounding the fact-finding visit and the issues raised during the delegation’s meetings, the report focuses specifically on Greenland; the situation of the Faroe Islands was not examined in comparable detail.

participate in decisions directly affecting the territory and reflects Greenland's special constitutional position within the Kingdom of Denmark.

55. Several interlocutors nevertheless observed that these safeguards operate primarily at the institutional level. While consultation with the Greenland Self-Government is well established, they considered that greater attention could be given to ensuring that Greenlandic civil society organisations and citizens are also able to participate effectively in the development of policies of particular relevance to Greenland. In this respect, the delegation notes that institutional consultation should complement, rather than replace, opportunities for direct engagement with civil society and affected communities.

Participation of Greenlanders living in Denmark

56. The delegation also heard concerns regarding the participation of Greenlanders living in Denmark, whose situation differs from that of the population residing in Greenland. Organisations consulted during the visit considered that existing legal and administrative frameworks do not always sufficiently reflect the linguistic and cultural identity of Greenlanders.
57. Public consultations conducted by Danish authorities on legislation and policies applicable in Denmark are generally carried out in Danish. The delegation did not identify a general legal requirement for consultation documents or public information to be made available in Greenlandic. This may create practical barriers to the effective participation of Greenlanders residing in Denmark who face linguistic difficulties, not only in matters specifically concerning Greenlanders but also in the broader range of legislative and policy processes affecting them as residents of Denmark.
58. Interlocutors further highlighted the limited availability of disaggregated demographic and socio-economic data concerning Greenlanders living in Denmark, making it more difficult to assess their specific needs and to develop evidence-based public policies. They also referred to persistent stereotypes and discrimination affecting Greenlanders in Denmark. According to the organisations consulted, the increased international attention devoted to Greenland in recent years, particularly that related to the interest of the US government in its resources and sovereignty, has also contributed to greater public awareness of these issues and encouraged a broader range of civil society organisations to engage with questions relating to equality, discrimination and the rights of Greenlandic communities. At the same time, they expressed concern that this increased visibility and attention to the situation of Greenlandic

communities may prove temporary unless accompanied by sustained public policies and long-term institutional commitment.

59. Several organisations observed that advocacy framed explicitly in terms of Indigenous rights and international human rights instruments may sometimes encounter greater scepticism in parts of the public debate than advocacy based on general principles of equality and non-discrimination. They also emphasised the distinctive position of Greenlanders living in Denmark: while they are Danish citizens and are not regarded as migrants, their specific cultural and linguistic identity is not always fully reflected in public policies and participation mechanisms. Denmark has ratified ILO Convention No. 169 and recognises the Indigenous population of Greenland (the Inuit) as an Indigenous people within the meaning of the Convention.¹⁹ Interlocutors therefore considered that greater attention should be given to the linguistic, cultural and participatory dimensions of this identity when developing policies and participation mechanisms affecting Greenlanders residing in Denmark.

Public discourse and online hostility

60. Most civil society organisations in Denmark operate in an open and safe environment, with broad opportunities to organise, advocate and participate in public debate, including when they disagree with government policies. At the same time, the experience is not uniform across civil society. Interlocutors representing or working with minority groups and on politically sensitive human rights issues described a more challenging environment, including increased political and public hostility and a perceived risk of financial, reputational and, in some contexts, legal consequences. These concerns were particularly pronounced in relation to advocacy on issues such as migration, LGBT+ rights and the Israel-Palestine conflict.
61. The concerns described above should also be seen against the broader human rights context affecting migrants and persons belonging to ethnic and religious minorities in Denmark. While migration and integration policies as such fall outside the scope of this report, their human rights implications cannot be entirely separated from the conditions in which the persons concerned exercise their freedoms of expression and association and participate in public life. Council of Europe monitoring has raised concerns regarding anti-Muslim racism and discrimination, the potential stigmatising effects of policies distinguishing between

¹⁹ Denmark ratified ILO Convention No. 169 on 22 February 1996. In connection with the ratification, the Danish Government declared that the Indigenous population of Greenland (the Inuit) constitutes the Indigenous people in Denmark within the meaning of the Convention. See also the Danish Ministry of Foreign Affairs' [response](#) to Parliamentary Question GRU No. 16 (2 December 2024), concerning the application of ILO Convention No. 169 to Greenlanders residing in Denmark.

persons with “western” and “non-western” backgrounds, and political discourse portraying Muslims, including persons with a migration background and persons granted asylum, as a threat to Danish values and culture.²⁰ More recent civil society monitoring has also identified barriers affecting ethnic and religious minorities, including discrimination and hate crimes affecting Jewish and Muslim communities, and has raised concerns regarding the ability of some groups to express themselves in a safe environment.²¹ Such concerns are relevant to civic space insofar as discrimination, stigmatisation and hostile public discourse may affect the conditions in which the persons concerned express their views, associate with others and participate in public life. The continuing relevance of these human rights concerns is also illustrated by developments following the fact-finding visit: in July 2026, the Council of Europe Commissioner for Human Rights addressed Denmark, together with four other States, concerning plans to establish “return hubs” outside the EU, calling for any such arrangements to comply with international human rights law and to be accompanied by strict human rights safeguards.²²

62. Several participants perceived a harsher tone in parts of political and public discourse and greater visibility of hostile or stigmatising narratives, including online and, in some cases, in statements by politicians. Concerns were raised particularly by organisations working on gender equality and LGBT+ rights, migration, minority rights and other issues that have become sensitive or contested in public debate. Participants also referred to the growing visibility of anti-gender narratives and to a tendency to portray some organisations taking positions on contested issues as ideological, activist or excessively political. These

²⁰ European Commission against Racism and Intolerance (ECRI), [ECRI Report on Denmark \(sixth monitoring cycle\)](#), adopted 29 March 2022 and [published 9 June 2022](#). ECRI expressed concerns, inter alia, regarding anti-Muslim racism and discrimination, the broader implications of the “parallel society” policy and the classification of migrants as “westerners” and “non-westerners”, including the risk of stigmatisation. ECRI also noted political discourse in which Muslims in Denmark, including persons with a migration background and persons granted asylum, were increasingly depicted as a threat to Danish values and culture. See also ECRI, [Conclusions on the implementation of the recommendations in respect of Denmark](#), adopted 3 July 2024 and published 15 October 2024.

²¹ See [Monitoring Action for Civic Space Country Report, 2025: Denmark](#). The report identifies continuing concerns regarding barriers to the fulfilment of fundamental rights affecting certain groups, including ethnic and religious minorities, LGBT+ persons, persons with disabilities and Indigenous peoples. It also refers to high reported levels of discrimination and hate crimes affecting Jewish and Muslim communities and considers the implications of such developments for the ability of some groups to express themselves safely.

²² Council of Europe Commissioner for Human Rights, [Letters to Austria, Denmark, Germany, Greece and the Netherlands to put in place strict human rights guardrails in their plans for ‘return hubs’](#), 16 July 2026. The Commissioner called for any such initiatives to comply with international human rights law, including through prior human-rights risk assessment, independent and continuous monitoring, enforceable human-rights clauses and effective parliamentary, public and judicial scrutiny.

developments were not presented as characteristic of Danish political debate as a whole, but as signals of a change that deserves attention.²³

63. Research²⁴ provided to the delegation by participants helps place these concerns in a broader context. A 2025 study by Analyse & Tal and TrygFonden examined approximately 73 million Facebook posts and comments published between 2021 and 2024 on the pages of politicians and political parties and media organisations, as well as in a sample of public citizen-run Facebook groups. It found that verbal attacks were more frequent in discussions on politicians' and political parties' pages than on media pages or in public citizen-run groups. Around half of the attack comments identified were classified as hate-based; among these, 35% concerned ethnicity or nationality and 22% gender or gender expression. This does not imply that politicians themselves were directly responsible for all comments appearing on their pages, but illustrates the difficult tone that parts of online political debate can take. The study also indicates that the problem is not entirely new, as the overall level of attacks had not improved compared with the previous monitoring period.
64. It is encouraging in this respect that the Danish authorities themselves collect and publish data on the quality of online democratic debate and its impact on participation. Research published by the Ministry of Digital Affairs in March 2025²⁵ found that the basic conditions for digital democracy in Denmark are in place and that citizens have good access to the digital public sphere. At the same time, 58% of Danes refrain from participating in online debates. More specifically, one in five citizens indicated that they would like to participate but refrain from doing so because of the harsh tone in online comment sections. The publication of such data provides a useful basis for following developments over time and considering responses where necessary.
65. These developments should be kept in perspective. Denmark continues to offer strong conditions for civil society organisations and individuals to take part in public debate, including by expressing critical or unpopular views. At the same time, the concerns heard

²³ See also CIVICUS Monitor, [Report finds hostile climate for environmental protests; Excessive force used against activists protesting military shipments to Israel](#), 30 June 2025, which reports concerns regarding particular forms of civic activism in Denmark, including environmental and climate-related protest. The update refers, inter alia, to concerns regarding the treatment and policing of activists, allegations of excessive force and intimidation, and a possible chilling effect on participation in peaceful protest. CIVICUS Monitor nevertheless continues to rate Denmark's civic space overall as "Open".

²⁴ <https://www.ogtal.dk/publikationer/angreb-og-had-i-den-offentlige-debat-paa-facebook>

²⁵ <https://www.digmin.dk/digitalisering/nyheder/nyhedsarkiv/2025/mar/ny-omfattende-undersogelse-den-digitale-demokratiske-samtale-er-under-pres>

during the visit suggest that hostile or stigmatising discourse, particularly when expressed or amplified by political actors, deserves attention. Preserving these favourable conditions requires continued attention to the quality of public debate and to developments that may discourage civil society actors and individuals from participating in it.

Access to information and the watchdog role of civil society

66. Access to information of public interest is important for civil society organisations to carry out research, advocacy and public-interest monitoring and to exercise their watchdog role effectively. Danish legislation provides a broad framework for access to documents held by public authorities, while access to judicial information is regulated separately under the Administration of Justice Act (*Retsplejeloven*). During the visit, interlocutors drew particular attention to access to court decisions and case information and to differences between the access rights available to the media and those available to civil society organisations performing comparable public-interest functions.
67. Under the Administration of Justice Act, any person may request copies of judgments and court orders, as well as decisions concerning legal costs in civil cases, subject to a number of exceptions. In particular, access to criminal cases finally concluded more than one year previously is restricted, unless access is sought for scientific research or by editors or editorial staff of mass media for journalistic or editorial purposes. The Act also provides additional access rights for the media in certain circumstances. Some participants suggested that civil society organisations carrying out public-interest monitoring, research or other watchdog activities should have comparable possibilities where access to judicial information is necessary for their work.
68. This question is also relevant when considered alongside the limitations on the ability of civil society organisations to bring proceedings concerning matters of public interest, discussed elsewhere in this report. Danish law does not provide NGOs with a general right of standing merely because a case concerns the public interest, although specific sectoral rules provide exceptions, notably in the environmental field. Access to judicial information and legal standing are distinct legal questions, but both are relevant to the ability of civil society organisations to exercise an effective watchdog role.
69. The role of civil society in this respect is recognised in Council of Europe standards. The preamble to Recommendation CM/Rec(2007)14 on the legal status of non-governmental organisations in Europe recognises the contribution of NGOs through, among other activities, advocacy and the monitoring of compliance with existing obligations under national and

international law. Paragraph 76 further provides that NGO participation in public decision-making should be facilitated through appropriate disclosure of, or access to, official information. Against this background, consideration could be given to whether civil society organisations performing public-interest monitoring and watchdog functions have adequate access to judicial information necessary for their work, while maintaining appropriate safeguards for privacy, the rights of the parties and the proper administration of justice.

FINANCING AND SUSTAINABILITY OF NGOS

A diversified funding model

70. Danish civil society benefits from diversified funding sources. Organisations receive funding from public grants, municipal support, lottery proceeds, private philanthropy, membership fees and donations. Social and welfare organisations, in particular, often receive public funding through service contracts or partnership agreements with public authorities. Associations may also generate income from economic activities, provided that any surplus is reinvested in their non-profit purposes.
71. Public funding has long been regarded as a legitimate expression of the partnership between the State and civil society rather than as an instrument of governmental control. Many organisations receive operating grants or project funding from ministries, municipalities or specialised public agencies. At local level, municipalities play an important role by supporting sports associations, cultural organisations, volunteer initiatives and social organisations through grants, access to public premises and other forms of practical assistance.
72. Lottery funding also constitutes an important source of support. Revenue generated through the national lottery continues to finance a broad range of activities in the fields of sport and culture. Interlocutors described this mechanism as politically independent and relatively stable, contributing positively to the long-term sustainability of many organisations. Unlike annual budget allocations, lottery funding has traditionally been perceived as operating at arm's length from political decision-making.
73. Denmark has a stable and predictable legal framework for philanthropy, and a well-established foundation sector with a long tradition of independent foundations. Several well-established philanthropic foundations provide substantial support for research, innovation, culture, health and selected civil society activities. Representatives of the philanthropic sector emphasised that private foundations frequently complement public funding by supporting

innovation, experimentation and long-term initiatives that may be difficult to finance through ordinary governmental programmes.²⁶

74. Membership fees and individual donations remain important, particularly for organisations rooted in voluntary participation. Nevertheless, many interlocutors observed that fundraising has become increasingly competitive as organisations seek to diversify their income and compensate for greater uncertainty surrounding public grants.
75. A significant recent development is the political agreement reached in 2025 to introduce a new model of core funding (*grundfinansiering*) for national voluntary social organisations. The reform seeks to replace a fragmented system of annual project grants with a more stable and predictable funding model, thereby strengthening organisational independence, reducing administrative burdens and supporting long-term planning. At the time of the visit, the detailed implementation of the new funding scheme was still under preparation.
76. A well-established framework for longer-term public funding exists for civil society organisations engaged in international development cooperation and humanitarian action. During the meeting with representatives of the Ministry of Foreign Affairs, the delegation was informed of the important role played by civil society organisations in Denmark's international development cooperation and of the continued commitment to funding partnerships with CSOs working in Africa, the Middle East, Eastern Europe and other regions. The Ministry maintains multi-year Strategic Partnerships with Danish civil society organisations, providing stability and predictability and supporting sustained cooperation with partners abroad. The current 2022–2026 framework²⁷ covers 18 strategic partners, while a new round of Strategic Partnerships for 2027–2031²⁸ is being established through an open process that has included consultation with civil society. Other funding mechanisms remain available to organisations outside the strategic partnership framework. The new framework also places increased emphasis on local leadership and equitable partnerships with civil society actors in partner countries. The institutional framework for dialogue has been further strengthened through the establishment, from January 2026, of the Partnership for Global Development²⁹, bringing together civil society, business, foundations and other stakeholders to contribute to Denmark's development cooperation.

²⁶ <https://philea.eu/wp-content/uploads/2024/11/Denmark-Philea-2024-Legal-Environment-for-Philanthropy-in-Europe.pdf>

²⁷ <https://um.dk/danida/samarbejsspartnere/civ-org/stoetteform/ny-runde-strategiske-partnerskaber-2022-2026>

²⁸ <https://um.dk/danida/samarbejsspartnere/civ-org/stoetteform/strategiske-partnerskaber-2027-2031>

²⁹ <https://um.dk/danida/inddragelse-af-danske-eksterne-aktoerer-i-udviklingssamarbejdet>

77. The delegation positively noted the value attached by the Ministry of Foreign Affairs to civil society as a partner in international cooperation, including the recognition of shrinking civic space as an issue of relevance to Denmark's development policy. This was broadly consistent with the views expressed by participants, who valued the stability of the longer-term partnership arrangements. Some participants nevertheless emphasised the importance of preserving diverse funding opportunities, including for smaller organisations, and of maintaining the independence and critical voice of civil society within close partnerships with public authorities. These considerations could be kept under review as the 2027-2031 framework is implemented.
78. The delegation also noted an increasing emphasis on strategic partnerships between municipalities and civil society organisations. The open exchange with representatives of Local Government Denmark (KL) provided the delegation with particularly useful insight into the role of municipalities in supporting and cooperating with civil society and into the diversity of approaches developed at local level. Beyond providing financial support, municipalities increasingly engage civil society as partners in addressing social challenges, strengthening community resilience and delivering welfare-related initiatives. The examples presented during the meeting illustrated different forms of cooperation, including partnership agreements, advisory bodies and other structured arrangements in areas such as social welfare, emergency preparedness and community development.
79. The delegation considers this municipal partnership model to be one of the notable strengths of the Danish enabling environment for civil society. The discussions with KL illustrated a clear understanding of the complementary roles of municipalities and civil society organisations, including the distinction between statutory public responsibilities and the added value that NGOs bring through community engagement, innovation and outreach. The delegation also noted the role played by KL in facilitating the exchange of experience and good practices across municipalities, thereby promoting more consistent approaches to cooperation with civil society. The examples presented during the meeting also demonstrated how municipalities engage civil society organisations in promoting the inclusion and participation of minority communities through local partnership structures.

Emerging challenges to financial sustainability

80. Despite the overall strength of the Danish funding system, virtually all discussions held during the visit identified financial sustainability as one of the principal challenges facing civil society organisations. The concerns expressed were not primarily related to the absolute level of available resources but rather to changes in funding structures, administrative practices and political expectations.

81. A recurring theme throughout the meetings was the gradual shift from long-term institutional support towards short-term project financing. Organisations reported that public authorities increasingly favour grants linked to specific projects, aligned to predefined policy priorities. Several organisations also observed that funding criteria have become more narrowly focused on service delivery and measurable outcomes. While such approaches strengthen accountability for public expenditure, they may also reduce organisations' flexibility to respond to emerging societal needs or invest in organisational development. Smaller organisations were considered particularly vulnerable because they often lack the administrative capacity required to compete successfully for multiple short-term grants.
82. Advocacy, watchdog activities, policy analysis and broader democratic participation were described as more difficult to finance, particularly through public sources. As a result, organisations working primarily on systemic change or public-interest advocacy may experience greater financial insecurity than organisations delivering services under contractual arrangements with public authorities.
83. Another concern repeatedly raised during the visit related to increasing administrative requirements attached to funding agreements. Numerous organisations reported that financial reporting, monitoring obligations and performance indicators have become significantly more detailed during recent years. While recognising the legitimate objective of ensuring accountability for public resources, interlocutors expressed concern that administrative burdens consume an increasing proportion of organisational capacity, particularly within smaller organisations relying largely on volunteers.
84. In relation to political activities and advocacy, some organisations expressed concern that critical positions or engagement in politically sensitive debates may affect their access to public funding. From a financial sustainability perspective, such perceptions may create additional uncertainty for organisations that depend significantly on public funding while maintaining an independent advocacy or watchdog role.

Public funding and organisational independence

85. Denmark has historically been regarded as a country in which extensive public funding coexists with a highly independent civil society. This model has functioned successfully because public authorities traditionally accepted that organisations receiving public support remained free to criticise governmental policies and advocate alternative solutions.

86. Against this historically strong background, several interlocutors nevertheless suggested that the balance between public support and organisational independence has become more fragile. Representatives from advocacy organisations expressed concern that critical public positions, particularly on issues such as migration, LGBTQI+ rights, minorities rights and foreign affairs, may increasingly be perceived as incompatible with close financial partnerships with public authorities. During the discussions, examples were cited of organisations believing that advocacy activities could influence future funding decisions or their inclusion within publicly supported programmes. Although such claims were difficult to verify individually, they were raised consistently across different sectors and therefore deserve careful attention as indicators of changing perceptions within civil society. Similar concerns have been identified in recent civil society monitoring, including in relation to public debates concerning the funding of organisations engaged in advocacy on politically contested issues.³⁰
87. Organisations working internationally, particularly in development cooperation and humanitarian activities, highlighted additional administrative burdens arising from the application of AML requirements to cross-border transactions and international partnerships.
88. The delegation notes that these developments do not originate from a Danish policy directed at civil society. Rather, they represent broader regulatory challenges affecting numerous European jurisdictions. Nevertheless, their practical consequences for civil society organisations merit continued attention, particularly where compliance requirements may unintentionally restrict humanitarian assistance, international solidarity or support for human rights defenders operating in difficult environments.
89. Another issue discussed during the visit concerned the resilience of Danish civil society in the context of changing international funding patterns. Organisations involved in international cooperation observed that reductions in external funding available from certain international donors have increased pressure on both public and philanthropic sources within Europe. Several interlocutors referred to the growing importance of European philanthropic cooperation while acknowledging that private foundations cannot fully compensate for reductions in governmental development assistance where these occur. This development reinforces the importance of maintaining a diversified funding ecosystem capable of supporting organisations working both domestically and internationally.

³⁰ European Civic Forum, [Civic Space Report 2026, Denmark chapter](#) prepared by Nyt Europa, May 2026. The report identifies concerns regarding the relationship between public funding and the independence of civil society organisations engaged in advocacy, including the potential chilling effect of funding decisions on organisations' willingness to take critical public positions.

CONCLUSIONS AND RECOMMENDATIONS

90. The delegation found that Denmark continues to provide a strong and broadly enabling environment for civil society. Freedom of association is protected, ordinary associations can be established and operate with limited administrative interference, and no concerns were identified regarding arbitrary registration refusals or politically motivated restrictions on formation of associations. Civil society remains an established partner of public authorities at national and local level, public consultation is a regular feature of legislative preparation, and organisations benefit from a diversified funding environment combining public, municipal, philanthropic and private sources. These features reflect a high level of compliance with the principles set out in Recommendation CM/Rec(2007)14 and other relevant Council of Europe standards.
91. The issues identified during the visit should therefore be understood primarily as emerging pressures within an otherwise favourable civic environment, rather than as evidence of a general deterioration of civic space. They concern, in particular, the growing administrative burden affecting some organisations; perceptions that advocacy and criticism of public policy may increasingly be treated as inappropriate or excessively political, including in connection with public funding; some areas where participation and access to information could be further strengthened; the need to strengthen the participation of Greenlandic communities; a harsher tone in parts of public and online debate and concerns about the conditions in which persons belonging to minority or otherwise marginalised groups, including persons with a migration background, can exercise their freedoms of expression and association and participate fully in public life; and changes in funding structures that may affect the long-term independence and sustainability of organisations. The delegation welcomes the openness with which public authorities, Members of Parliament, municipalities and civil society representatives discussed these issues and the ongoing initiatives aimed at reducing unnecessary administrative burdens.
92. Denmark's strong tradition of trust and cooperation between public authorities and civil society is an important asset. Preserving it requires maintaining a clear distinction between legitimate requirements of accountability and the substantive independence of civil society organisations, including their freedom to advocate policy change, criticise public authorities and contribute to debate on sensitive or contested issues. The recommendations below are therefore intended mainly to consolidate existing strengths and address emerging concerns before they become more significant obstacles to civic participation.
- Continue efforts to keep the legal and administrative framework for associations simple and proportionate, including by ensuring that the implementation of anti-money-laundering and

customer-due-diligence requirements does not impose unnecessary burdens or inadvertently impede legitimate civil society activities.

- Safeguard the freedom of civil society organisations to engage in public-policy advocacy, legislative reform, public campaigning and criticism of government policies, including where they receive public funding, in line with Recommendation CM/Rec(2007)14. Maintain a clear distinction between legitimate civil society advocacy and party-political activity.
- Consider strengthening opportunities for civil society organisations to protect the public interest through access to justice, while taking account of existing sector-specific standing rules, and consider implementing the procedural and other safeguards contained in Committee of Ministers Recommendation CM/Rec(2024)2 on countering the use of SLAPPs.
- Preserve the strengths of the Danish consultation system while encouraging involvement of relevant stakeholders at an earlier stage, before key policy choices are finalised; enhancing the transparency and inclusiveness of informal consultation channels, including the visibility of opportunities to participate and of the stakeholders involved; maintaining adequate consultation periods; and improving the visibility and accessibility of consultation opportunities organised by local authorities.
- Strengthen the effective participation of Greenlandic civil society organisations and Greenlanders living in Denmark in decisions affecting them, including by addressing relevant linguistic and cultural barriers, improving the availability of disaggregated data and ensuring that participation mechanisms adequately reflect their distinctive cultural, linguistic and Indigenous identity.
- Continue monitoring developments affecting the safety and openness of public debate and, in line with ECRI General Policy Recommendation No. 15 on combating hate speech³¹, take appropriate measures to prevent hate speech, intimidation and stigmatising narratives from discouraging civil society actors and individuals from participating in public life.
- Develop an inclusive equality policy framework for the work of civil society and NGOs including combatting all forms of racism, including Islamophobia, and discrimination based on gender and sexual orientation.
- Consider whether civil society organisations performing public-interest monitoring and watchdog functions have adequate access to judicial information necessary for their work,

³¹[https://hudoc.ecri.coe.int/eng#{%22sort%22:\[%22ecripublicationdate%20descending%22\],%22ecriidentifier%22:\[%22REC-15-2016-015-ENG%22\]}](https://hudoc.ecri.coe.int/eng#{%22sort%22:[%22ecripublicationdate%20descending%22],%22ecriidentifier%22:[%22REC-15-2016-015-ENG%22]})

while maintaining appropriate safeguards for privacy, the rights of the parties and the proper administration of justice, having regard to the role of NGOs recognised in Recommendation CM/Rec(2007)14.

- Preserve a diversified and sustainable funding environment for civil society, with particular attention to the availability of longer-term and core funding, proportionate administrative requirements and funding opportunities for advocacy and watchdog organisations as well as service providers.
- Strengthen transparency and confidence in public funding decisions by promoting clear and objective criteria, reasoned decisions and effective review mechanisms where appropriate, while ensuring that organisations are not disadvantaged in access to lawful public funding because they criticise government policies or advocate legal or policy reform. In the context of discretionary parliamentary allocations, continued progress on the integrity framework applicable to Members of Parliament, in line with GRECO recommendations, would further reinforce public confidence.

ANNEX - Programme of the Visit

Sunday 10 May

Arrival of delegation; 17.00-19.30 Briefing of delegation and preparation of the meetings

Monday 11 May

09.30-10.30 Round table 1 with NGOs: thematic discussion on structural challenges and opportunities for Danish civil society when it comes to finance and registration and how to exercise rights in practice (eight organisations).

11.00-12.30 Round table 2 with NGOs: thematic discussion on racism and discrimination (seven organisations)

13.30-15.00 Round table with public authorities: registration, supervision, funding models of NGOs, and dialogue with the authorities - Danish Financial Supervisory Authority; Ministry of Foreign Affairs; Ministry of the Interior and Health; Ministry of Social Affairs and Housing; Ministry of Environment and Gender Equality of Denmark; Ministry of Justice

15.30-17.00 Round table with public authorities: access to decision-making processes, preparation of new policy proposals and participation in consultation responses, and access to public records; current rules, guidelines, and procedures for involvement, including the consultation portal (see list above)

18.30-20.30 Informal working dinner about the situation in Denmark with academics and legal, human rights and civil society specialists

Tuesday 12 May

09.30-10.30 Round table 3 with NGOs: thematic discussion on structural challenges and opportunities for social dialogue, advocacy, collaboration and accessibility (eight organisations)

11.00-12.30 Round table 4 with NGOs: thematic discussion on work related to gender equality, LGBT+ (eight organisations)

13.30-14.30 Meeting with Danish MPs: members of political groups, minority representatives and MPs who are members of the Parliamentary Assembly: involvement of civil society in their work; access of civil society to the authorities and political level (six representatives)

15.00-16.00 Meeting with private foundations: the prominent role played by foundations in funding civil society actors in Denmark and the place in their power in the general landscape (six organisations).

Wednesday 13 May

09.00-10.00 Meeting with KL - Local Government Denmark (98 municipalities), four representatives: the work and support of municipalities with civil society