



UPINION

Policy brief: The operating environment of migration-focused CSOs in Niger

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Introduction

Civil society organizations (CSOs) in Niger play a crucial role in addressing the challenges faced by migrant populations. Through recent interviews with key migration-focused CSOs in the country, Upinion has gathered insights into the environment in which these organizations operate. This brief summarizes the main findings and provides actionable recommendations to donors and government partners to enhance CSOs' effectiveness in tackling migration issues in Niger.

Methodology

This policy brief draws on multiple data sources, including desk research, five structured in-depth interviews with CSOs covering different geographical parts of the Niger, and a key informant interview with an expert on the Sahel region. The in-depth interviews were conducted with representatives of migration-focused CSOs in Niger who are currently in the selection process to become in-country partners of Upinion under the Bridge to Safety project, funded through the 2023-2028 Migration and Displacement Grant Policy framework of the Dutch Ministry of Foreign Affairs (MoFA). Their firsthand insights provide a valuable understanding of their operational environment, the challenges they face, and their interactions with government entities. While the interviews with CSOs were conducted in French, the key informant interview was held in English. All interviews were recorded. By combining qualitative data from these various sources and applying thematic analysis, this brief offers a comprehensive assessment of the current landscape for migration-focused CSOs in Niger.¹

¹ Please note that the majority of this brief is based on a limited sample of five interviews with CSO representatives and may not fully reflect the diverse experiences of organizations across different regions.

Key findings

In this study, it became evident that migration-focused CSOs in Niger increasingly perceive their operational environment as complex, challenging, and subject to heightened scrutiny following the rise of the military regime. This shift is noticed in several key areas, including heightened regulatory pressure, stricter oversight, a shrinking space for freedom of expression, and less funding. These factors, however, are in constant flux, as the political and operational landscape in Niger continues to evolve rapidly.

Legal and bureaucratic constraints

To operate legally in Niger, civil society organizations (CSOs) must obtain an official registration document, referred to as an *arrêté d'enregistrement* or *arrêté de reconnaissance*.² This document serves as proof of their legal status and, according to some interviewed CSO representatives, is often published in the *Journal officiel de la République du Niger*, ensuring transparency and public recognition. International NGOs must take an extra step before reaching this stage—they first need accreditation from the Ministry of Foreign Affairs.

After their initial registration, CSOs must navigate a series of ongoing legal requirements to remain compliant. Before launching a project in a specific region, a project implementation protocol must be signed with the regional governor. This agreement lays out key details, such as the activities to be carried out, their locations, the stakeholders involved, the structure of oversight committees, and the frequency of the meetings.³ CSOs must coordinate with the relevant ministries to secure approval for project initiation, daily operations, and travel, including field missions.⁴ Following project implementation, the organizations must submit annual narrative and financial reports to relevant ministries and to tax authorities like the *Direction Générale des Impôts*.⁵⁶

“For example, for another project related to migrants, we signed the implementation protocol with the governor of the Agadez region. This protocol details how the project will be carried out, who the members of the monitoring committee will be, and whether the committee itself will be established. It also specifies the stakeholders involved in this committee and the frequency of its meetings. These are all necessary steps—if they are not completed, the project cannot be implemented.” - CSO representative

² Upinion interviews with CSO representatives, February 2025.

³ Upinion interviews with CSO representatives, February 2025.

⁴ Personal communication with CSO representative, December 2023.

⁵ <https://www.icnl.org/resources/civic-freedom-monitor/niger>

⁶ Upinion interviews with CSO representatives, February 2025.

Recent regulatory changes by the ruling junta have intensified the reporting obligations, as CSOs must now submit annual activity reports earlier than before, with stricter enforcement: failure to meet the deadline can result in the immediate revocation of their registration certificate.⁷ Moreover, the junta has introduced a new prerequisite for accessing project funding—organizations must obtain a formal proof of report submission.

“Before, [annual report submission] was required but without sanction, but now, if you don’t submit by March 31st, the sanction is the immediate withdrawal of the recognition decree/accreditation. The deadline before was March 31st, but it is now the 3rd.” - CSO representative

“Before, they didn’t give you an attestation. They’ve now made it so that in project calls, the eligibility criteria require the attestation of report submission.” - CSO representative

These increased reporting and cooperation obligations have been mentioned to result in CSOs bureaucratic hurdles that can delay program implementation.⁸ For instance, the interviewed CSO representatives mentioned obtaining signed implementation protocols from regional governors can sometimes be time-consuming. Additionally, the requirement to notify authorities before every activity and field movement was described as *“one of our biggest frustrations.”* Importantly, one CSO representative noted that being well-established and recognized as a key actor by local authorities can help streamline administrative and bureaucratic processes, facilitating quicker implementation of activities and smoother government approvals.

“We experienced about two months of delay due to the process of signing the implementation protocol with the governor of Agadez. However, we found that these delays were often due to minor adjustments—small modifications and insertions that needed to be made to the protocol.” - CSO representative

“Since this is not our first project in this area, we were already known and recognized as key actors by local authorities. This meant that we did not face the kind of bureaucratic hurdles new organizations might encounter, such as excessive administrative demands or delays. Being a well-established organization in the region helped facilitate our work. In a way, the existing relationships between NGOs and local authorities play a role in enabling the quick implementation of activities and securing government approval” - CSO representative

⁷ Upinion interviews with CSO representatives, February 2025.

⁸ Upinion interviews with CSO representatives, February 2025.

On February 7, 2025, the Ministry of Interior established a new technical committee to oversee CSO management, a move that could further complicate bureaucratic processes for organizations operating in the country.⁹ While the full impact of this additional oversight remains uncertain for migration-focused CSOs, media reports have indicated that it marks a significant shift toward increased government control and scrutiny of civil society activities.¹⁰ According to the Ministry's order itself, the committee will monitor NGOs to ensure their activities align with the priorities set by the ruling military, with annual reports subject to close scrutiny to enforce compliance.¹¹ In parallel to this development, the "National Conference for Refoundation", established on February 15-20, 2025, to steer the national dialogue on Niger's governance reform, including justice, human rights, security, and sustainable development, is also likely reshaping the operational environment for CSOs and redefining their role within the evolving governance framework.¹²

Many interviewed CSOs indeed reported feeling an increasing pressure to align their efforts with the government's priorities. Although the pre-junta government also expected CSOs to align with public policies, under the current context, they have felt that this expectation has intensified with the increasing reporting and compliance obligations. One CSO representative highlighted how this environment places organizations at the mercy of ministry officials, making them vulnerable to administrative obstacles and potentially arbitrary decisions. Activities that do not directly align with the government's priorities were described as risky, forcing organizations to either adjust their initiatives to comply or face potential repercussions.

"Everything has to align with the president's vision, which has been outlined in a program called the National Resilience Program—that's the new reference document—it must be tied to that framework. Anything outside of that program is considered risky." - CSO representative

The threat of suspension looms large over both national and international NGOs. Several organizations have already faced such measures, including the French aid group Agency for Technical Cooperation and Development (ACTED), the local nonprofit Action for Well-Being (APBE), and, more recently, the International Committee of the Red Cross (ICRC), which was suspended.¹³

⁹<https://westafricaweekly.com/niger-government-establishes-committee-to-monitor-ngos-amid-humanitarian-sector-scrutiny/>

¹⁰<https://newscentral.africa/niger-demands-ngos-comply-with-junta-directives/>

¹¹<https://newscentral.africa/niger-demands-ngos-comply-with-junta-directives/>

¹²<https://www.assises-nationales.ne/>

¹³<https://westafricaweekly.com/niger-government-establishes-committee-to-monitor-ngos-amid-humanitarian-sector-scrutiny/>

"It's quite a—I can use the word—critical situation. It's critical because right now, we are in a polarized context where organizations that do not show alignment with the authorities in place are being suspended. This trend started some time ago. There have already been some national organizations whose recognition decrees have been suspended, as well as some international organizations." - CSO representative

Migration-specific legal challenges

Organizations working with migrants in Niger face specific legal challenges, especially after recent shifts in the national migration framework. Prior to the junta, the anti-smuggling law (law 2015-36) led drivers transporting migrants along unofficial routes to take dangerous desert paths, often abandoning migrants when encountering military patrols to avoid checkpoints.¹⁴ The law also led to the arrest and imprisonment of individuals involved in migrant transit as well as those providing assistance.¹⁵

The repeal of the 2015 law, which followed the arrival of the military regime, is seen by some migration-focused CSOs as a positive development. Interviewed CSO representatives suggested that it has led to the "decriminalization" of migration, reducing both direct legal threats to migration-related work and the fear among migrants of being stopped by authorities.

"These individuals [irregular migrants in Niger] are often at risk of being arrested, but now with the law's enactment, speaking of the 2015 law, it seems that, at least in organizing the last end-of-year activity in Agadez, more and more migrants are no longer hiding. They even came forward to share testimonies and were, in fact, the majority of participants in most of the activities we organized." - CSO representative

However, while the repeal of the law might suggest a more relaxed legal environment for migrants, the military authorities have introduced a new ordinance on the entry and stay of foreigners in Niger.¹⁶ A key provision of this ordinance reportedly prohibits lodging or assisting individuals in an irregular situation, which could pose significant risks for CSOs that operate shelters or provide direct aid to migrants without legal status. While the law may not explicitly target CSOs, it creates a legal framework that could be used against them, particularly if the authorities adopt a stricter interpretation. One CSO representative noted that the enforcement of this ordinance has already led to increased border controls. However, the full implications of the new measure for both migrants and the organizations that assist them remain uncertain, and several CSOs are closely monitoring its application.

¹⁴ Upinion interviews with CSO representatives, February 2025.

¹⁵ Upinion interviews with CSO representatives, February 2025.

¹⁶ Upinion interviews with CSO representatives, February 2025.

“Recently, the military authorities also adopted an ordinance on entry and stay in Niger. We are currently observing its implementation to identify key points and concerns for civil society.” - CSO representative

Money laundering and anti-terrorism financing regulations

Regulations on anti-money laundering (AML) and counter-terrorism financing (CTF) require CSOs to meticulously audit and report their financial activities. In areas with security concerns, CSOs are acutely aware of the need to avoid inadvertently financing terrorist groups, which directly impacts their security protocols.¹⁷ This heightened due diligence around AML/CTF regulations can complicate the process of opening and maintaining bank accounts, which are vital for the day-to-day operations of CSOs.

It is important to clarify that the interviewed CSO representatives did not indicate that these regulations have a specific impact on their organizations working with migrants. Rather, they seem to be part of a broader national framework impacting various sectors.

“[In case of a security incident with armed groups], we do not pay ransoms to armed groups to prevent the funding of terrorism.” - CSO representative

“The only issue is around opening a [bank] account for activities as soon as possible, especially when there are important resources involved given the context of financial drought. In such cases, there is usually a dialogue between the organization and the bank to explain why the money is needed and within what timeframe.” - CSO representative

“[As organization] you need to discuss with the bank to mobilize funds, including your own, especially in a context of limited alternative resources. For instance, if the budget is 10 million, as an example, and the bank is under pressure, you need to justify why the funds are needed and when. Often, the bank may contact the signatories or ask for documents such as the activity schedule to ensure that they are not providing funds that may be misused. The bank needs to know in order to make the necessary decisions and provide the required funds.” - CSO representative

Shrinking funding

The 2023 coup d'état in Niger significantly reshaped the funding landscape for migration-focused CSOs, as shifting donor priorities and heightened government scrutiny have made access to funding increasingly difficult.¹⁸ National funding remains limited and is increasingly influenced by government concerns over CSO activities and their reliance on external financial sources (see section on “State-CSO relations”).¹⁹ Following the coup, projects funded by the EU and France

¹⁷ Upinion interviews with CSO representatives, February 2025.

¹⁸ https://www.nrc.no/globalassets/pdf/nrc-advocacy-note_-development-funding-sahel.pdf

¹⁹ Upinion interviews with CSO representatives, February 2025.

were suspended or terminated,²⁰²¹ and while the EU has signaled a possible resumption, tensions persist.²² With relations at a historic low, funding linked to France is not just precarious but particularly and largely off-limits, as the government seeks to distance itself from former colonialities and its foreign influence.²³

"In 2024, the external factor that greatly affected us was, of course, the 2023 coup d'état. When it happened, we were in the midst of discussions with partners, and we were almost about to sign project agreements with the European Union. But with the coup, activities were interrupted. We had a significant project with Canal France International, and it was also halted due to the coup. So, in terms of activity volume, it had a major impact. At one point, we had no activity, and our contributions weren't enough to pay salaries. We had to put the staff on technical unemployment for a while until we could resume. That's really the foreign funding factor." - CSO representative

"Because grants are becoming increasingly scarce, they mostly come from organizations in the North of Europe, such as Denmark. So far, we've been able to maintain partnerships where they already have well-structured projects and are simply looking for implementing partners. That's where opportunities still exist." - CSO representative

The impact of this shrinking funding environment is tangible for migration-focused CSOs, with limited resources leading to competition among organizations has intensified.²⁴ Additionally, existing funding often comes with strict legal requirements for international and national project proposals, close monitoring of foreign funding sources, and administrative hurdles to ensure transparency—such as stricter financial disclosure requirements and obligations to keep the government informed about any activities involving foreign funding. A notable example of the latter is the junta's criticism of the EU for providing flood relief without prior notification (see third quote).

"Other than from Northern European countries like Denmark, most funding comes through calls for proposals....That is how things work now. This shift has led many civil society organizations to give up because if you're not compliant in terms of documentation or don't have the internal expertise to properly draft a solid project proposal, then you won't be able to present anything." - CSO representative

"When the government speaks of monitoring and aligning organizations with public policies, what is often hidden behind these words is the intention to track the funding sources of civil society

²⁰https://www.nrc.no/globalassets/pdf/nrc-advocacy-note_development-funding-sahel.pdf

²¹https://www.megatrends-afrika.de/assets/afrika/publications/policybrief/MTA_PB28_Gutheil_Tsch%C3%B6rner_Civil_Society_in_Niger.pdf

²²Upinion interviews with CSO representatives, February 2025.

²³<https://www.brasildefato.com.br/2025/02/03/sahel-countries-exit-france-associated-bloc-with-street-celebrations-and-launch-new-passports/>

²⁴Upinion interviews with CSO representatives, February 2025.

organizations and NGOs. They want to know where the money comes from, which country, which partner, et cetera. Organizations are now required to submit annual reports, even those that were not previously subject to such obligations. By collecting these reports, the government aims to determine who is funding them.” - CSO representative

“The recent tension [with EU funding] was specifically related to intervention activities for flood response. The government criticized the EU for mobilizing funds without informing them and for distributing them to three organizations without involving the state. However, they did not ban organizations from receiving aid. They only stated that they would audit the three organizations that benefited from the funding. Additionally, they requested the departure of the EU ambassador in place and asked for a replacement.” - CSO representative

Furthermore, the scrutiny of organizations' financial structures and health has been noted to lead to operational constraints, including temporary restrictions on staff salary disbursements.²⁵ According to a CSO representative interviewed, banks have also reportedly received instructions to create difficulties for certain organizations. The already challenging economic situation, compounded by international sanctions, has made even basic financial transactions, such as salary withdrawals, increasingly complicated for CSOs.

“Authorities scrutinized the financial situation of [organization’s name]. As a result, we faced some restrictions. Some staff members who went to collect their salaries were turned away.” - CSO representative

“It’s also important to link this to the context of a very difficult economic downturn. The banks are facing a financial situation caused by sanctions, which is very challenging. Even today, to withdraw one’s salary, it must be done in installments, which is very complicated. The same applies to the implementation of activities; it’s often hard to plan far in advance, and we have to try to recover daily withdrawals to ensure the activities proceed.” - CSO representative

Important to note is that the interviewed CSO representatives highlighted how their organizations are constantly adapting to the funding environment, by conducting regular context analyses to identify emerging needs and align their operation and proposals with donor priorities. They also seek partnerships with other CSOs and international organizations to leverage resources and expertise, as well as to jointly advocate for funding.

Well, there are two ways [to define programs or activities]. The first is when there is a call for project submissions; we look at the priorities set by the donors and the types of activities that are eligible. We then build our project based on the priorities defined by the donor. Of course, we also take into account

²⁵ Upinion interviews with CSO representatives, February 2025.

our presence on the ground and the needs we identify in the field. The other approach is to base our activities on field assessments and evaluations to propose relevant actions and advocate with partners for funding.” - CSO representative

Political instability and security concerns

Niger is grappling with escalating security threats from multiple militant groups. The Islamic State in the Sahel Province (ISSP) has strengthened its presence along the Niger-Mali border, in northern Dosso, and in areas of northwestern Nigeria.²⁶ Simultaneously, Jama'at Nasr al-Islam wal-Muslimin (JNIM), a rival jihadist group, has intensified its operations in southwestern Niger's Tillaberi region and southern Dosso, near the borders with Burkina Faso, Benin, and Nigeria, while seemingly also showing more operational presence in northern Agadez and around capital Niamey. Then, along the Niger-Nigeria border, Boko Haram's activities particularly and severely impact Niger's Diffa region, experiencing regular influxes of Nigerian refugees and returning Niger nationals.²⁷ New alliances are also forming between Tuareg, Toubou, and other rebel groups along the Mali-Niger border, as well as within Niger itself, increasingly and additionally challenging the state's military forces.²⁸ This situation not only fuels tensions in the region, contributing to and resulting from the spillover of instability from neighboring countries, but it also leads to significant displacement, creating growing numbers of internally displaced persons within Niger.

While it is civil society that has been proven to have a crucial role in engaging with communities, obtaining trust, stimulating dialogue, and promoting peace and security in those areas,²⁹ CSOs operating in Niger's conflict zone face significant risks and limitations. Particularly the ongoing insurgency in the border regions with Mali and Burkina Faso has further led to security concerns, leading to increased militarization and restrictions on movement, which hinder the activities of civil society actors.³⁰ CSOs now face additional barriers to accessing these regions, as military escorts are increasingly required, particularly in zones of military operations.³¹ While this requirement predates the junta, it has been significantly reinforced under the current regime, placing a heavy logistical and financial burden on CSOs. The interviewed migration-focused CSOs explained how they simply lack the funds to cover these unforeseen costs, as such expenses are usually not included in project budgets. They also described how this new level of oversight allows authorities to control CSO movements more closely, making them increasingly reliant on

²⁶<https://acleddata.com/conflict-watchlist-2025/sahel-and-coastal-west-africa/>

²⁷<https://data.unhcr.org/fr/news/11025>

²⁸<https://acleddata.com/conflict-watchlist-2025/sahel-and-coastal-west-africa/>

²⁹https://www.researchgate.net/profile/Ndifon-Obi/publication/333562047_Civil_Society_Organizations_and_Peacebuilding_in_the_Niger_Delta_Towards_a_Partnership_for_Effective_Civic_Engagement/links/5cf445f74585153c3daecd9c/Civil-Society-Organizations-and-Peacebuilding-in-the-Niger-Delta-Towards-a-Partnership-for-Effective-Civic-Engagement.pdf

³⁰<https://news.un.org/en/story/2024/01/1145672>

³¹Upinion interviews with CSO representatives, February 2025.

officially communicated information and limiting their ability to potentially document and expose human rights violations in military operating areas.

“The government of Niger made a decision. It existed before, but it has now been reinforced – the use of escorts. This provision existed before, but it was somewhat optional, and now it has been made mandatory. You cannot travel inside the country without an escort; they have made it compulsory, especially in certain areas.... I was with the director of NGOs, and I discussed it with him. I asked, 'Is there a map that shows from which level you need to take the escort?' He said no. He added that the United Nations system, which should be the first to either approve or reject, is taking the escort starting from Niamey. Even for traveling to Maradi from Niamey, they already require one. Yeah, these are huge challenges for us, national NGOs, and they are costs that are never budgeted for, so the issue of accessibility in certain areas is really problematic. ” - CSO representative

In response to security restrictions, CSOs seek alternative strategies, such as relying on public transportation to reach affected communities.³² Organizations are updating their security protocols and risk management plans to adapt to the evolving security situation and related regulations, with some seeking external expertise to strengthen their measures.

“We’ve found some tricks. One trick is that we don’t use our vehicles. For example, if we want to leave at 10 AM from Zinder, we leave the vehicles inside and take the bus to continue the journey because, with the bus, you’re safer. We take the bus, do the activities, and return by bus. That’s the first trick. The second trick is that we rely on local NGO partners to implement activities, but there’s also the risk of competition because, if you let others do it, you might not get the same results as when you do it yourself, both in terms of activity implementation and financial management. So, these are the risks, but this is the reality in this context.” - CSO representative

“We already have a security officer on our staff who is there to help the organization ensure that we adhere to and adapt to all security aspects. The context is changing in Niger, and while we try to adapt, this is why, at the end of the year, we also sought international expertise to help us review our security system.” - CSO representative

Freedom of expression and association

Prior to the military coup, during the implementation of the 2015 anti-smuggling law criminalizing migration, it was reportedly more difficult for CSOs to openly advocate for migrant rights.³³ However, since the arrival of the military authorities, who have repealed this law, there seems to be a shift.³⁴ Interviewees suggested that the environment for expressing views on migrant rights

³²Upinion interviews with CSO representatives, February 2025.

³³ Upinion interviews with CSO representatives, February 2025.

³⁴Upinion interviews with CSO representatives, February 2025.

has become somewhat more open, as well as that organizations involved in migrant rights advocacy have been able to resume their work, including activities such as information sessions, legal assistance, and raising awareness, often through platforms and partnerships, without facing major obstructions. Migrants themselves have also been participating more openly in public forums and sharing their testimonies.

"In principle, there is no problem. People can speak freely. Previously, during the enforcement of the migration policy law, it was more difficult to express oneself. But now that they have modified it, there are no major issues. As I said, as long as you don't directly target the military, everything runs smoothly. But you must be careful. They even issued a directive outlining what people should not do." - CSO representative

"Migrants in an irregular situation were often reluctant to participate in public activities for fear of encountering law enforcement or judicial authorities. However, with the evolution of the 2015-36 migration law, I noticed a shift—particularly during our last end-of-year event in Agadez. More and more migrants are no longer hiding; they even shared testimonies and made up the majority of participants in many of our recent activities." - CSO representative

"In fact, the current climate for migration-related work may even be more favorable than before. Prior to the coup, a 2015 law criminalizing smuggling was in effect, but the situation has since evolved" - CSO representative

However, this relative freedom exists within a broader context of increased government scrutiny of civil society, particularly since the military takeover. The focus of the current military regime on issues of national sovereignty and security means that CSOs working on migrant rights need to be mindful of potential sensitivities. Directly questioning or holding the military regime accountable is a red line, and many organizations and media outlets engage in self-censorship to avoid potential repercussions and arbitrary arrests.³⁵³⁶³⁷ Despite these challenges, several CSOs remain committed to migrant rights monitoring, documentation, and protection, considering their work essential for migrants' survival.³⁸

"We are operating under an exceptional regime, with increasing restrictions on individual and collective freedoms. The risks we face are serious—from the potential arrest of members to police raids on our offices, whether here or elsewhere. Many organizations have already been banned under this regime, and it could happen to us as well. However, we remain steadfast in our mission, fully aware that these pressures are meant to push us off course and prevent us from continuing the work we have been

³⁵Upinion interviews with CSO representatives, February 2025.

³⁶<https://www.amnestyusa.org/wp-content/uploads/2025/03/Niger-Threatened-and-Brought-to-Heel-Human-Rights-and-Civic-Space-Under-Pressure-Since-the-26-July-Coup.pdf>

³⁷<https://www.hrw.org/world-report/2025/country-chapters/niger>

³⁸Upinion interviews with CSO representatives, February 2025.

doing since the organization's founding." - CSO representative

A prominent and illustrative case of how restrictions on freedom of expression and association impact humanitarian organizations is the unexpected suspension of the International Committee of the Red Cross (ICRC) in Niger.³⁹ Just before the CSOs that are part of this study were interviewed, the junta halted ICRC's activities without an official explanation, revoked its operating license, denounced its headquarters agreement, and ordered all expatriate staff to leave the country immediately. According to interviewed CSOs, a likely reason for this decision was the junta's reported dissatisfaction with ICRC's consistent stance of neutrality, which was seen as not aligning with the military regime's interests. ICRC's position may have led to a misunderstanding, prompting the junta to take a rigid, black-and-white approach.

State-CSO relations

As evident in previous sections, the relationship between the government and CSOs has also become increasingly strained, with a perceived "critical eye" of the junta on some organizations, especially those working on human rights and the state's budgetary transparency.⁴⁰ Likewise, activities focused on women's empowerment, such as girls' education, are often perceived as advancing the agendas of Western donors and have, in some cases, been interrupted or suspended.

For migration-focused organizations specifically, it seems to be within acceptable bounds, though they must exercise caution when addressing the sensitive topics described above or being perceived as supporting terrorism.⁴¹ However, even for those working on migration, especially outside the capital, state representatives of the central government often remain hesitant to participate in specific CSO-led activities, uncertain whether these activities might cross their boundaries, even when they recognize the professionalism of these organizations.

"Some organizations operate in more sensitive areas and may find themselves walking a fine line due to their focus. CSOs working on human rights or budget transparency, for example, often engage in activities that directly challenge government policies. As a result, they are sometimes perceived as opposition groups. If we look at a global scale, organizations like Amnesty International often face friction with authorities because of their advocacy work. They are sometimes suspected of serving foreign interests." - CSO representative

³⁹<https://www.rfi.fr/en/africa/20250206-niger-junta-expels-red-cross-citing-sovereignty-offers-no-explanation>

⁴⁰Upinion interviews with CSO representatives, February 2025.

⁴¹Upinion interviews with CSO representatives, February 2025.

“When activities take place outside the capital, we sometimes feel that representatives of the central government are reluctant or afraid to participate, even though they recognize the influence and professionalism of the organization in question.” - CSO representative

While there might not be explicit discrimination specifically targeting migration-focused organizations, there is a perceived “two-tier treatment” to CSOs based on their perceived alignment with state priorities.⁴² Organizations that support the military regime’s narratives, particularly those centered on “decolonization” and “sovereignty,” tend to receive more favorable treatment. In contrast, CSOs that maintain independence or express critical perspectives face heightened scrutiny and restrictions, and even those that choose to remain neutral and continue their traditional missions encounter challenges in sustaining their work, as they must carefully navigate government expectations while preserving their core mandates.

To maintain a positive relationship with the authorities, CSOs must constantly adapt their strategies. As evident in previous sections and emphasized by the interviewed representatives, a key approach is ensuring full transparency by informing relevant ministries of every step, activity, or task they undertake. This proactive communication helps mitigate potential tensions, avoid misunderstandings, and demonstrates their commitment to operating within the established framework.

“In all our projects, we always write and send an information letter to the Ministry of the Interior, which handles these matters. We present the project and send a clarifying letter to ensure the technical service is aware. This has always protected us. We were already doing this before the coup, and actually, a former minister even congratulated us for that. Not many NGOs in the media sector do this, except for those in Niger, which keeps on informing authorities of their activities, even though most activities are technical We don’t like involving the minister, but we always send an information letter to explain what we are doing, and this has kept us safe from the wrath of those in power.” - CSO representative

Corruption

The 2023 military takeover has significantly reshaped Niger's governance and anti-corruption landscape. While the junta claims to be fighting corruption as part of their new development strategy, recent developments, including the suspension of the Constitution and the dissolution of the Supreme Court, suggest that corrupt practices persist in public governance.⁴³⁴⁴ Third-party

⁴²Upinion interviews with CSO representatives, February 2025.

⁴³<https://ti-defence.org/wp-content/uploads/2025/01/Nigers-defence-sector-Institutional-resilience-to-corruption-amidst-a-changing-political-landscape.pdf>

⁴⁴<https://ti-defence.org/country/niger/>

governance indicators have shown a decline since the coup,⁴⁵ signaling growing concerns. Moreover, under military rule, increased secrecy is expected around defense planning, spending, and personnel recruitment and payments.⁴⁶ The exemption of defense expenses from taxes, duties, and fees during the transition only adds to the worries about potential misuse of funds.

Corruption, and especially the lack of transparency, were also acknowledged issues by the interviewed CSOs. However, when asked whether corruption impacts the work of CSOs on migration in Niger, responses of the interviewed organizations varied. This might be because its impact is nuanced and depends on several factors, including the level of government interaction, the specific sector of work (i.e. advocacy vs. direct service delivery), the nature of the relationships between the CSO and government entities, and the operational strategies adopted by the organizations.

It is important to note, as highlighted by a Key Informant, that the topic of corruption was discussed with CSOs without considering their own definitions of corruption. What may be considered corruption by European standards, for example, might not be viewed as corruption by them.

Conclusion

Migration-focused CSOs in Niger operate in a complex and rapidly changing environment characterized by legal, financial, and security challenges. The operational landscape is becoming increasingly restrictive under the military regime, with CSOs facing mounting regulatory pressure, including stricter oversight, intensified reporting obligations, and the risk of immediate registration revocation for non-compliance. At the same time, the funding has contracted due to shifting donor priorities and heightened government scrutiny, particularly affecting projects previously supported by Western actors. While the repeal of the 2015 anti-smuggling law suggests a loosening of restrictions on migrant rights advocacy, clear red lines remain, especially regarding criticism of the military regime or perceived alignment with Western influence. Organizations that cross these boundaries risk suspension or loss of legal status, as seen in recent cases affecting international, national, and local CSOs.

To continue operating in this challenging environment, migration-focused CSOs must proactively engage with authorities, ensuring transparency in their activities and aligning their work with national priorities. While these strategies help sustain operations, constant scrutiny and the potential for arbitrary decisions create significant bureaucratic and operational challenges. With

⁴⁵<https://www.elibrary.imf.org/downloadpdf/view/journals/002/2025/026/article-A003-en.pdf>

⁴⁶<https://ti-defence.org/country/niger/>

the priorities outlined very recently by the “National Conference for Refoundation” take shape, CSOs will likely have to ensure their activities are in alignment with its directives to preserve their role and legitimacy. Likewise, the establishment of a new technical committee to oversee CSOs signals that strict oversight is likely to persist, requiring organizations to remain agile and adaptive to continue serving migrant communities in Niger.

These recent developments—including the introduction of a new ordinance on entry and exit regulations, the establishment of a technical committee overseeing CSOs and the National Conference for Refoundation, and indications of the resumption of EU funding—illustrate the constantly shifting environment, making it difficult to fully assess their impact on migration-focused CSOs. This evolving regulatory and financial landscape will continue to require close monitoring to determine how these measures affect CSOs’ ability to operate effectively on migration in Niger.

Recommendations

Based on the findings of this study, the following recommendations aim to strengthen the operational environment for migration-focused CSOs in Niger and enhance their sustainability, effectiveness, and impact. These recommendations focus on key areas such as funding, legal support, security, and collaboration between local and international organizations.

To donors (including the EU and EU governments):

Funding support for migration-focused CSOs

- Increase the number of funding opportunities that explicitly involve local civil society partners in both the design and implementation of migration-related programs. Prioritize mechanisms that support sustained, long-term partnerships, which are critical for local organizations to build resilience and maintain impact over time. Given the current operational environment, this presents a strategic opportunity to enhance their roles in migration programs.
- Ensure that funding structures actively promote equitable partnerships between INGOs and national or local CSOs. Frameworks like the 2023-2028 Migration and Displacement Grant Policy framework demonstrate how funding mechanisms can require INGOs to collaborate on more equal terms. By embedding clear guidelines and accountability measures, donors can prevent power imbalances and ensure that local CSOs receive adequate resources, including coverage for administrative and security-related expenses.

- Prioritize funding for migration-focused CSOs outside major urban centers like Bamako, including smaller, less-established organizations. Supporting these CSOs helps to create a more diverse and resilient civil society that reflects the varied needs of different communities, as well as enhances reach and sustainability of donor-supported initiatives, ensuring a wider and robust impact across different regions.
- Encourage funding and programs where organisations like IOM, UN, and other international actors collaborate more closely with local migration-focused CSOs, leveraging local partners' invaluable insights, visibility, and ownership to enhance program effectiveness and sustainability.
- Support South-South cooperation by funding partnerships between CSOs in Niger and Libya focused on documenting Human Rights Violations (HRVs), migrant protection, and the reintegration of returnees. This will strengthen the capacity of local organizations addressing cross-border migration issues, enhance regional collaboration, and improve responses to current migration challenges.
- Invest in ongoing analysis of the civil society environment in Niger, regularly identifying key trends and impact on operations. A deep understanding of these factors enables donors to engage effectively and support meaningful activities and reforms.

Legal environment and civil society space protection

- Promote the protection of civil society space by supporting legal aid programs or lawyers' unions that assist migration-focused CSOs in navigating regulatory frameworks. This support can help ensure that migration-focused organizations are able to operate effectively, avoid arbitrary suspensions or penalties, and uphold their rights to advocate and provide essential services.
- Support public awareness campaigns that highlight the critical role of CSOs in addressing migration-related challenges, while ensuring they avoid direct criticism of the government. By promoting the value of local civil society organizations, their institutional and public recognition can be encouraged, moving beyond suspicion and restrictions.
- Actively monitor any restrictions placed on migration-focused civil society. Regular monitoring of restrictions can help inform policy and ensure that civil society's ability to address migration challenges remains intact without putting organizations at undue risk.
- Encourage the development and implementation of robust financial tracking systems for migration-focused CSOs to maintain transparent records, ensuring compliance with anti-money laundering and anti-terrorism financing regulations. By giving local organizations the tools and resources they need to navigate complex financial regulations,

donors can reduce the risk of penalties while promoting good governance within the civil society sector.

- Ensure that anti-corruption measures are sensitive to the impact on local organizations and offer them the necessary resources to navigate this complex environment. Promoting transparency and accountability at all levels of operation is crucial to safeguarding local CSOs' work.

Security support

- Provide support to ensure migration-focused CSOs are covered by appropriate risk-sharing mechanisms, including safety and security insurances. This helps mitigate operational risks, particularly in high-risk areas that are often critical to donor priorities, and ensures the continued functioning of organizations working in challenging environments.
- Allocate specific funding to support security-related costs, such as the hiring of escorts or covering other safety protocols. This will help ensure that CSOs can operate safely in areas where access is difficult or dangerous, without diverting from their programmatic objectives.
- Encourage the creation of standardized security procedures for CSOs, including a compensation fund for staff in the event of abductions or other security incidents. Donors should also prioritize a clear duty of care, ensuring that these organizations are not only funded but also supported in ensuring the safety of their staff.

To UN agencies and (I)NGOs:

- Collaborate more closely with local CSOs in programming areas related to migration. Local organizations provide crucial contextual knowledge, which can increase the relevance and impact of projects. Their involvement ensures programs are both effective and sustainable.
- Support mechanisms that allow smaller migration-focused CSOs to benefit from the networks, resources, and expertise of international organizations, while also ensuring that local organizations' leadership and capacity are recognized and reinforced. This creates a more balanced and mutually beneficial partnership where local actors can play a leading role in driving initiatives forward.
- Improve access to security-related information for local migration-focused CSOs, as international organizations often have more detailed and timely security assessments.

Link information-sharing systems to local CSOs to enhance their operational planning and safety measures.

- Ensure leadership of local CSOs: Promote the leadership and capacity of smaller migration-focused CSOs by ensuring their active involvement in decision-making processes. Recognize local organizations as central actors in driving migration-focused initiatives.

Future research



Under the 2023-2028 Migration and Displacement Grant framework by the Dutch Ministry of Foreign Affairs, Upinion will continue monitoring the evolving operational environment of migration-focused CSOs in Niger, providing annual briefs to track progress, challenges, and emerging trends, offering valuable insights for informed decision-making and strategic support.⁴⁷

Should you be interested in exploring more nuanced insights or discussing the operational environment and situation of CSOs working on topics such as LGBTQ+, climate change, women's empowerment, girls' education, democratic transition/governance, or any other relevant topics, we would be happy to engage in that conversation and explore potential research opportunities. Please feel free to reach out to marouen@upinion.com.

⁴⁷The same applies to Mali, Libya, and Türkiye—which are also Upinion's target countries under the 2023-2028 Migration and Displacement Grant Framework.

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