HUMANITARIAN ACCESS OVERVIEW

Spotlight on bureaucratic and administrative impediments

July 2025

CRISIS IN SIGHT

acaps

INTRODUCTION

ACAPS' Humanitarian Access Overview provides a snapshot of the most challenging contexts for humanitarian access globally in the past six months.

In the Global Humanitarian Access Index, ACAPS analysts consider nine variables for assessing and comparing humanitarian access levels worldwide. Data is gathered per specific crisis at the national, subnational, and regional levels. Information is then aggregated at the country level, and a country score is provided as an indication of the humanitarian access situation. Between December 2024 and May 2025, crisis-affected populations in 36 countries experienced high to extreme access constraints that made it difficult for them to meet their basic needs.

By November, ACAPS was monitoring humanitarian crises in 80 countries around the world. Access scores show a deterioration in 33% of crisis-affected countries (26 countries) and an improvement in 16% (13 countries), while the humanitarian access situation remained stable for 51% (41 countries). This distribution, which is consistent with those observed in previous months, underscores the persistence of high to extreme levels of humanitarian constraints (3–5) in 45% of crisis-affected countries.

This issue of the Global Humanitarian Access Overview focuses on one indicator from the humanitarian access analysis framework: bureaucratic and administrative impediments (BAIs). It examines constraints that hinder both the ability of people in need to access humanitarian assistance and the capacity of humanitarian organisations to reach crisis-affected populations. Specifically, it focuses on impediments related to entry and registration requirements, domestic movement restrictions, customs and import procedures, administrative delays and denials, programmatic interference, constraints on human resources, financial regulations, lack of policy alignment, and the administrative documentation required to receive aid.

The emphasis on this indicator reflects the growing trend of restrictive measures that limit the operational space of humanitarian organisations – ranging from burdensome registration processes and domestic travel restrictions to complex importation procedures and excessive reporting demands. These constraints are increasingly observed not only in conflict-affected contexts but also in countries experiencing displacement, climate-related hazards, and political or economic crises.

The report focuses on crisis-affected contexts where such impediments have been documented over the past six months. It examines the trend of these constraints, their impact on humanitarian response, and how the situation might evolve in the coming months based on historical data.

> *Bureaucratic and administrative impediments (BAIs) are constraints that hinder both the ability of people in need to access humanitarian assistance and the capacity of humanitarian organisations to reach crisis-affected populations.*

INTRODUCTION

HOW ARE ACCESS LEVELS CALCULATED?

ACAPS' methodology groups nine indicators under three dimensions:

PILLAR 1	Access of people in need to humanitarian aid	GO TO PILLAR 1

1. Denial of existence of humanitarian needs or entitlements to assistance
2. Restriction and obstruction of access to services and assistance

PILLAR 2	Access of humanitarian organisations to people in need	GO TO PILLAR 2

3. Impediments to enter the country (bureaucratic and administrative)
4. Restriction of movement within the country (impediments to freedom of movement and/or administrative restrictions)
5. Interference into implementation of humanitarian activities
6. Violence against humanitarian personnel, facilities, and assets

PILLAR 3	Physical, environmental and security constraints	GO TO PILLAR 3

7. Insecurity or hostilities affecting humanitarian assistance
8. Presence of landmines, improvised explosive devices (IEDs), explosive remnants of war (ERW), and unexploded ordnance (UXO)
9. Physical constraints in the environment (obstacles related to terrain, climate, lack of infrastructure, etc.)

The scoring model rates indicators on a scale of 0–3 and then combines them in pillars, where they get a final score on a scale of 0–5. The overall access score by country is ranked according to the following scale:

- Extreme access constraints
- Very high access constraints
- High access constraints
- Moderate access constraints
- Low access constraints
- No significant access constraints

For definitions and examples of the indicators used, along with details about the data model behind the methodology, please *see here*.

INTRODUCTION

HOW WERE THE HIGHLIGHTED COUNTRIES SELECTED?

The narratives included in the report do not cover all countries experiencing high to extreme access constraints. Instead, ACAPS included only the countries highlighted during a joint analysis process aimed at identifying major specific or recurrent access concerns related to BAIs. For this reason, the narratives do not cover all the pillars of the humanitarian access analysis framework.

WHAT ARE OUR SOURCES?

ACAPS' Humanitarian Access Methodology uses qualitative and quantitative information and data sources, collating them in a structured way in the Humanitarian Access Index, to quantify the level of humanitarian access in a number of contexts. ACAPS analysts collect information from a range of credible and publicly available secondary sources, including UN agencies; governments; international, national, and grassroots NGOs; international and local media; and humanitarians working in the countries and areas analysed.

Some of the most relied-upon sources and datasets are:

- the Aid Worker Security Database by Humanitarian Outcomes
- the Aid in Danger project by Insecurity Insight
- the Armed Conflict Location & Event Data Project
- the International NGO Safety Organisation
- OCHA's Humanitarian Needs Overviews, situation reports, humanitarian snapshots, and access severity mapping
- Landmine Monitor reports.

Read more about our methodology.

LIMITATIONS

ACAPS' Humanitarian Access Overview faces the same limitations as all secondary data reviews. Information might not be available without physical presence in the countries analysed, and information by third parties might come with a certain degree of delay, especially in very volatile contexts. When possible, analysts cross-check available information with humanitarians working in countries of operation.

ACAPS most often assesses contexts in the Humanitarian Access Overview at the country level, meaning some indicators might represent a sum of the crises present in a country. A more detailed granularity is available in the published dataset.

DISCLAIMER

The deterioration or increase in access constraints recorded in some countries might be the result of receiving new information previously not available rather than actual changes in the situation.

TABLE OF CONTENT

HUMANITARIAN ACCESS TRENDS

SCORE CHANGES SINCE THE JUNE–NOVEMBER 2024 PERIOD

This overview compares the overall level of humanitarian access between the last Global Humanitarian Access Index published in January 2025 (covering June–November 2024) and this latest ACAPS assessment (covering December 2024 to May 2025) published in August 2025. The trends are reported for all countries (with scores of 0–5). **The reporting period of the trends corresponds to when the data was gathered for the index. That said, the narratives on BAIs examine trends beyond these reporting periods.** This analytical choice was made to better capture and provide nuance on evolving BAI trends over time.

SCORE INCREASE
Humanitarian access has deteriorated

BOLIVIA	IRAQ	MOLDOVA
CHAD	ITALY	MOROCCO
COSTA RICA	JORDAN	NIGER
CÔTE D'IVOIRE	LESOTHO	NIGERIA
DOMINICAN REPUBLIC	LIBYA	PAKISTAN
ECUADOR	MADAGASCAR	PHILIPPINES
EGYPT	MALAWI	SYRIA
INDIA	MAURITANIA	TÜRKIYE
IRAN	MEXICO	

SCORE DECREASE
Humanitarian access has improved

BANGLADESH	EL SALVADOR
BELARUS	GUATEMALA
BURKINA FASO	PERU
BURUNDI	SOMALIA
CAMEROON	SOUTH SUDAN
CENTRAL AFRICAN REPUBLIC	UGANDA
DEMOCRATIC PEOPLE'S REPUBLIC OF KOREA	

SCORE STABLE
Humanitarian access remained the same

AFGHANISTAN	DJIBOUTI	INDONESIA	NAMIBIA	SPAIN	UKRAINE
ALGERIA	ERITREA	KENYA	NICARAGUA	SUDAN	VENEZUELA
ANGOLA	ESWATINI	LEBANON	PALESTINE	TANZANIA	YEMEN
BENIN	ETHIOPIA	MALAYSIA	PANAMA	THAILAND	ZAMBIA
CHILE	GREECE	MALI	PAPUA NEW GUINEA	TOGO	ZIMBABWE
COLOMBIA	HAITI	MOZAMBIQUE	RUSSIA	TRINIDAD AND TOBAGO	
DEMOCRATIC REPUBLIC OF CONGO (DRC)	HONDURAS	MYANMAR	RWANDA	TUNISIA	

EXECUTIVE SUMMARY

This report highlights the growing impact of BAIs on humanitarian access in increasingly complex operating environments owing to political fragmentation, legal volatility, and multi-authority control. **Although they can be imposed unintentionally, BAIs are not just technical hurdles. They often reflect political strategies of control over humanitarian space.** BAIs typically originate from governments or other governing bodies, but a variety of entities, such as de facto authorities, institutional donors, or humanitarian agencies acting as intermediaries through partnership agreements, can also initiate BAIs (IASC 01/2022).

The increase of high-intensity armed conflicts and the implementation of stringent regulations governing both national and international NGOs (such as foreign agent laws, local registration mandates, and onerous reporting requirements) have made BAIs a significant obstacle to humanitarian aid delivery and the provision of services to those in need (ICVA 20/05/2024; InterAction 16/12/2024). Checkpoints, curfews, and no-go zones often limit access to crisis-affected areas, with permits frequently denied. As the rule of law is often weakened or nonexistent in conflict-affected areas, the lack of clear legal guidelines means humanitarian organisations have to negotiate on an ad hoc basis. This adds to the legal and financial constraints of operating in conflict zones that involve sanctioned entities, as banks and donors implement burdensome due diligence requirements (OCHA 04/12/2024; UNSC 03/04/2024; SARI Global 16/03/2025). Countries such as Myanmar, Palestine, Sudan, and Yemen exemplify how entry restrictions, interference by conflict parties, and movement limitations severely obstruct humanitarian operations. It is important to note, however, that these impediments are not limited to conflict-affected settings.

Politically driven regulations are also being implemented in many other crisis-affected countries. Governments in El Salvador, Peru, and Venezuela have implemented laws imposing stringent registration requirements, increased scrutiny, new taxation (as on foreign funding), and onerous reporting obligations on NGOs. Examples of restrictive legal frameworks are El Salvador's Foreign Agents Law and Venezuela's NGO Oversight Law. These laws or related governmental decisions significantly restrict the operational space for humanitarian organisations and challenge their ability to act in accordance with humanitarian principles, particularly neutrality and independence, by imposing increasing government control over operations (WOLA 13/06/2025; InterAction 16/12/2024; AA 17/04/2025; NRC 06/05/2025).

This report also highlights how BAIs directly undermine the efficiency and effectiveness of humanitarian operations. **Delays in issuing visas and work permits restrict the timely deployment of skilled personnel, slowing down needs assessments, delaying the scale-up of programmes, and weakening emergency response capacity**. At the same time, restrictions on the importation of humanitarian goods – such as medical supplies, food, and information technology equipment – cause critical supply chain disruptions. Customs clearance delays, import taxes, and permit denials further compound these challenges, disproportionately affecting communities already in urgent need. These constraints not only increase operational costs but also hinder coordination efforts across the humanitarian response.

In contexts such as Libya, Sudan, and Yemen, competing lines of authority (e.g. state and de facto authorities, ministries, and local administrations) impose contradictory requirements to humanitarian organisations, leading to legal uncertainty and operational paralysis. The obstacles generated include conflicting registration processes, permits for movement that are not recognised across different areas of control, and inconsistent approval for humanitarian projects. In several countries, the pre-approval of aid projects by security groups or de facto authorities, surveillance of national staff, and threat of legal prosecution for unauthorised aid delivery have made it even more difficult for both international and grassroots NGOs and UN agencies to engage in frontline response. The direct consequences for crisis-affected populations are significant: aid delivery delays, interruptions to essential health and protection services, reduced humanitarian presence in areas experiencing security-related and physical constraints, and loss of community trust in aid providers.

Despite their increasing prevalence, BAIs are still not well documented or analysed by humanitarian responders compared to security-related access restrictions, which benefit from more systematic monitoring tools, such as the Aid Worker Security Database and the Humanitarian Data Dashboard (AWSD accessed 30/07/2025; INSO accessed 30/07/2025). Yet BAIs can have significant financial, operational, and human resource impacts on humanitarian organisations and crisis-affected populations (NRC 2025; ICVA 20/05/2024). This report aims to fill this knowledge gap by providing a comprehensive overview of BAIs in different crisis contexts. By documenting these challenges and their consequences, this report contributes to a better understanding of how bureaucratic and administrative obstacles limit humanitarian access. It also highlights the need for more robust monitoring and analysis by humanitarian organisations working on data management and information.
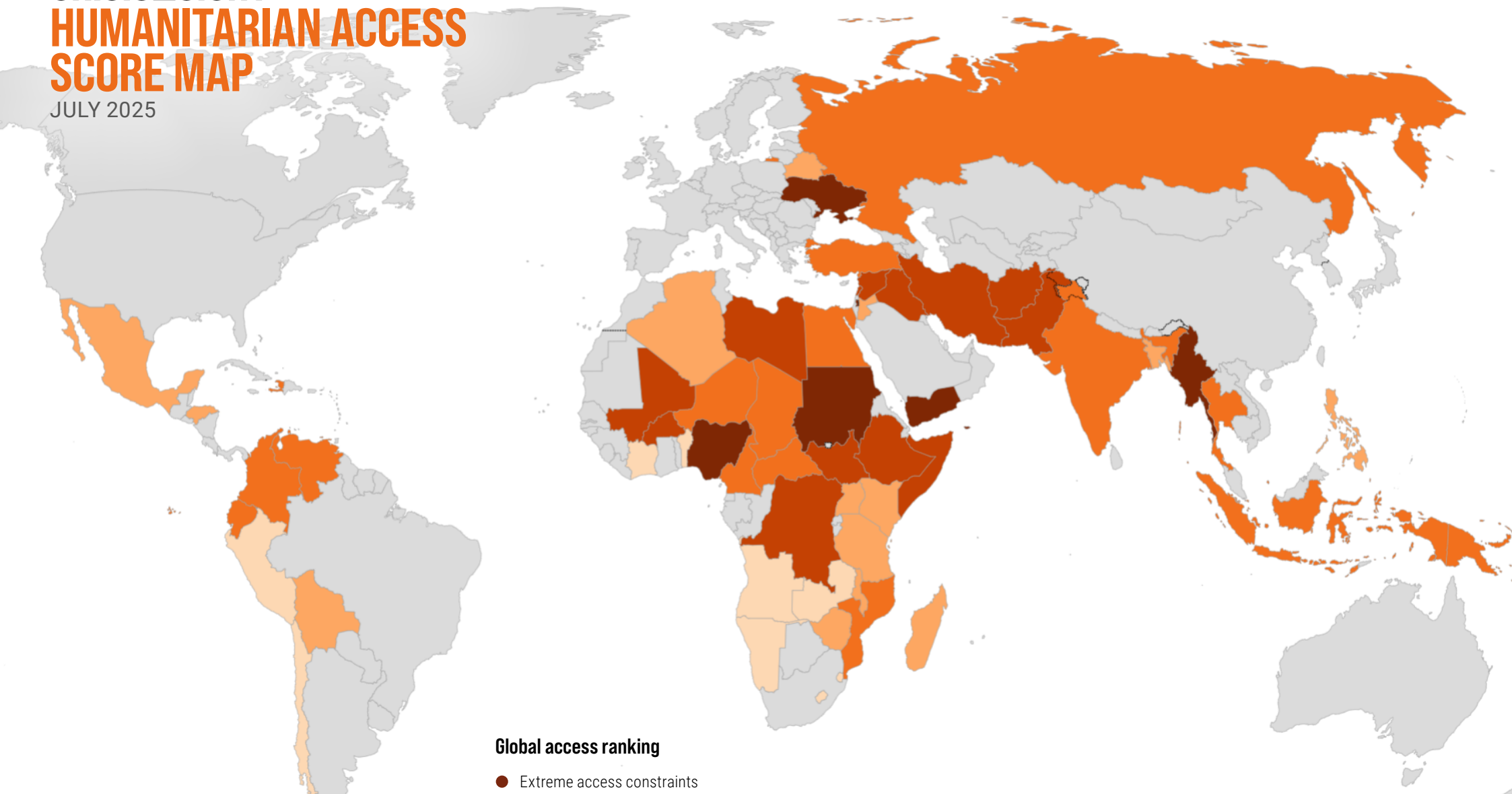
CRISIS INSIGHT
HUMANITARIAN ACCESS
SCORE MAP
JULY 2025

Global access ranking

- ● Extreme access constraints
- ● Very high access constraints
- ● High access constraints
- ● Moderate access constraints
- ● Low access constraints
- ● No significant access constraints

Date created: 04/08/2025

Access of people in need to humanitarian aid

This map illustrates the global ranking of the scores
in the first pillar 'access of people in need to humanitarian aid'.

PILLAR 1 · PILLAR 2 · PILLAR 3

- Denial of existence of humanitarian needs or entitlements to assistance.
- Restriction and obstruction of access to services and assistance.
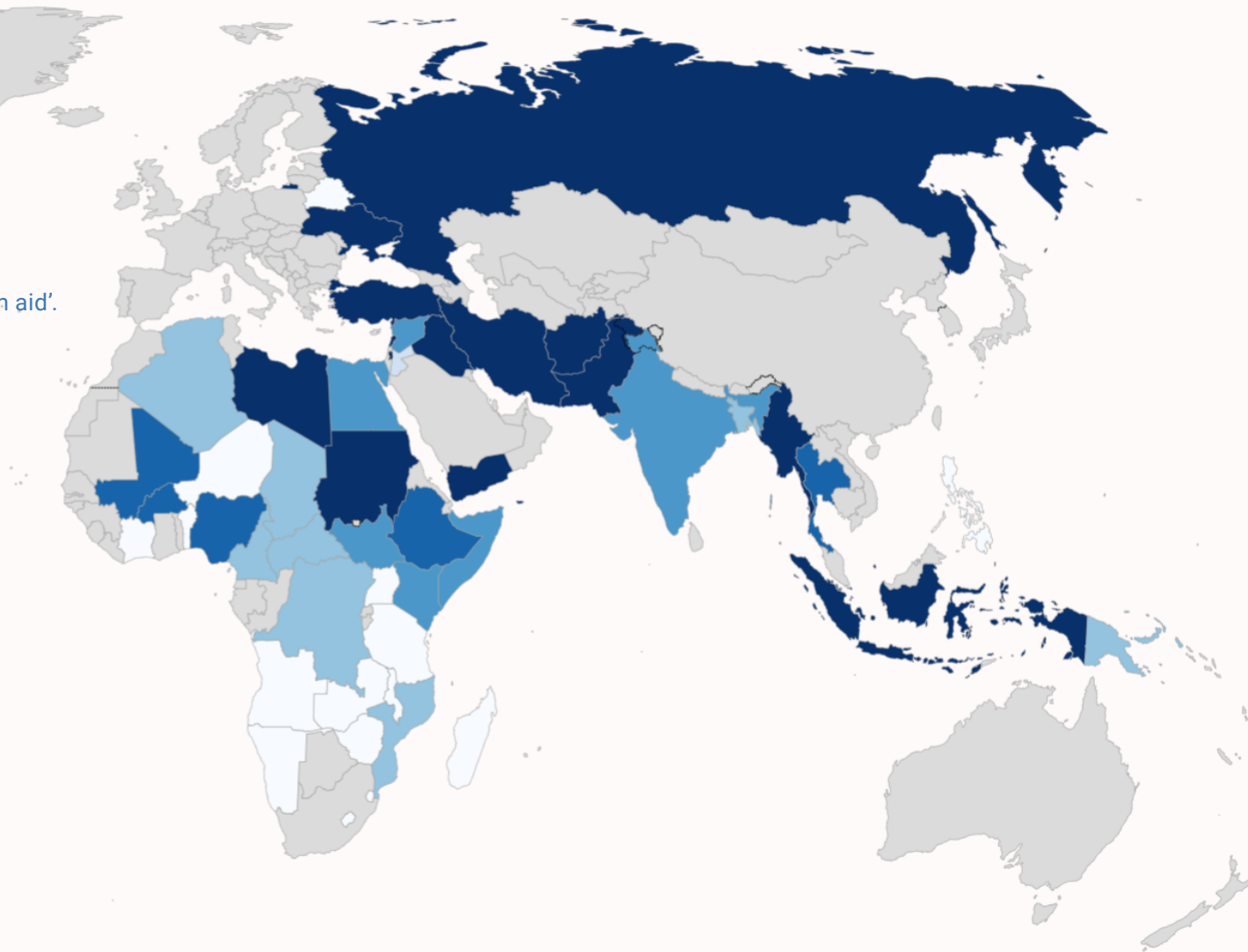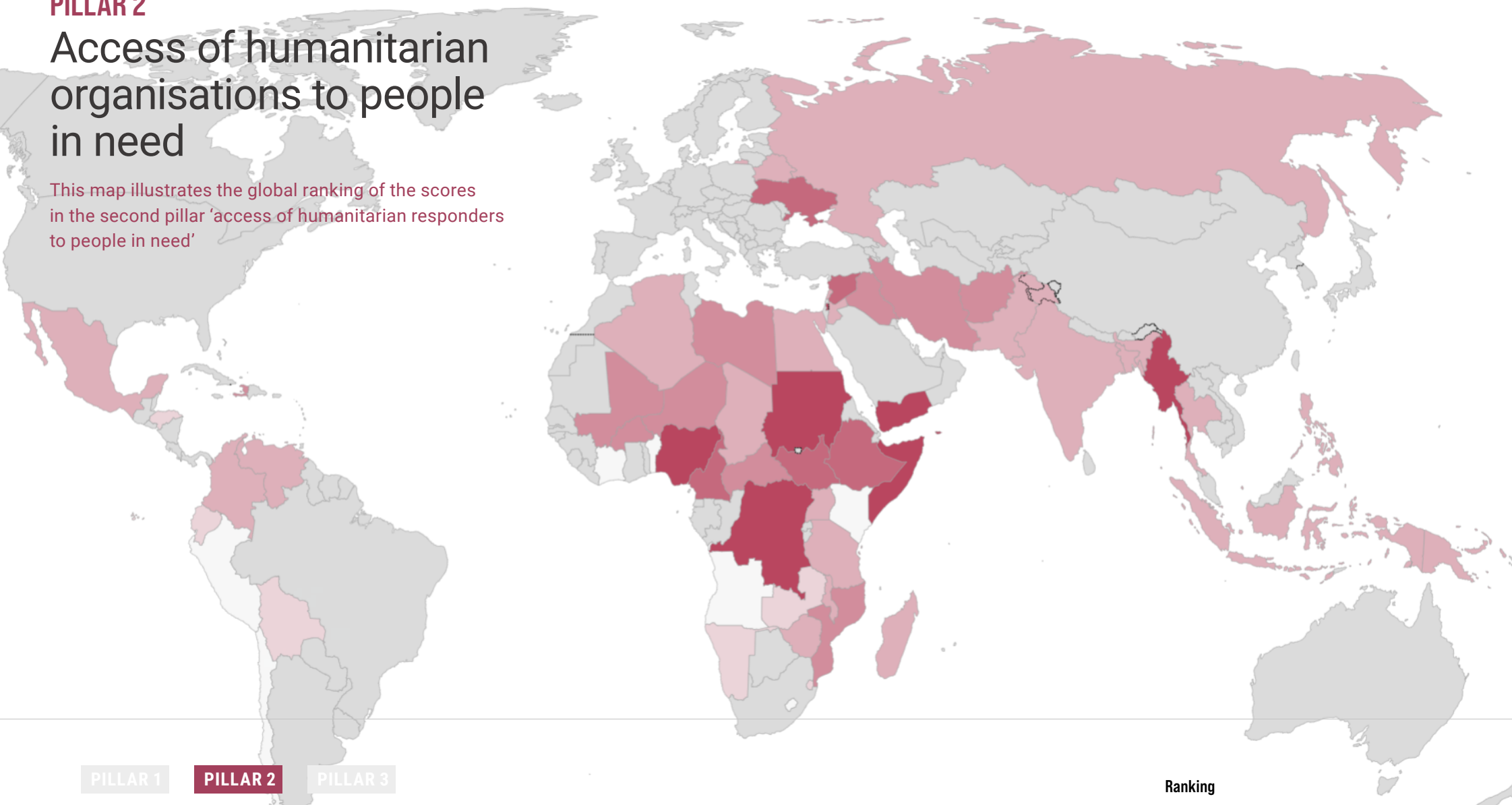
Ranking

- ● Extreme access constraints
- ● Very high access constraints
- ● High access constraints
- ● Moderate access constraints
- ● Low access constraints
- ● No significant access constraints

Date created: 04/08/2025

Access of humanitarian organisations to people in need

This map illustrates the global ranking of the scores in the second pillar 'access of humanitarian responders to people in need'

PILLAR 1   **PILLAR 2**   PILLAR 3

- Impediments to enter the country (bureaucratic and administrative).
- Restriction of movement within the country (impediments to freedom of movement and/or administrative restrictions).
- Interference into implementation of humanitarian activities.
- Violence against humanitarian personnel, facilities, and assets.

Ranking

- ● Extreme access constraints
- ● Very high access constraints
- ● High access constraints
- ● Moderate access constraints
- ● Low access constraints
- ● No significant access constraints

Date created: 04/08/2025

Physical, environmental and security constraints

This map illustrates the global ranking of the scores in the third pillar 'physical, environmental, and security constraints'.
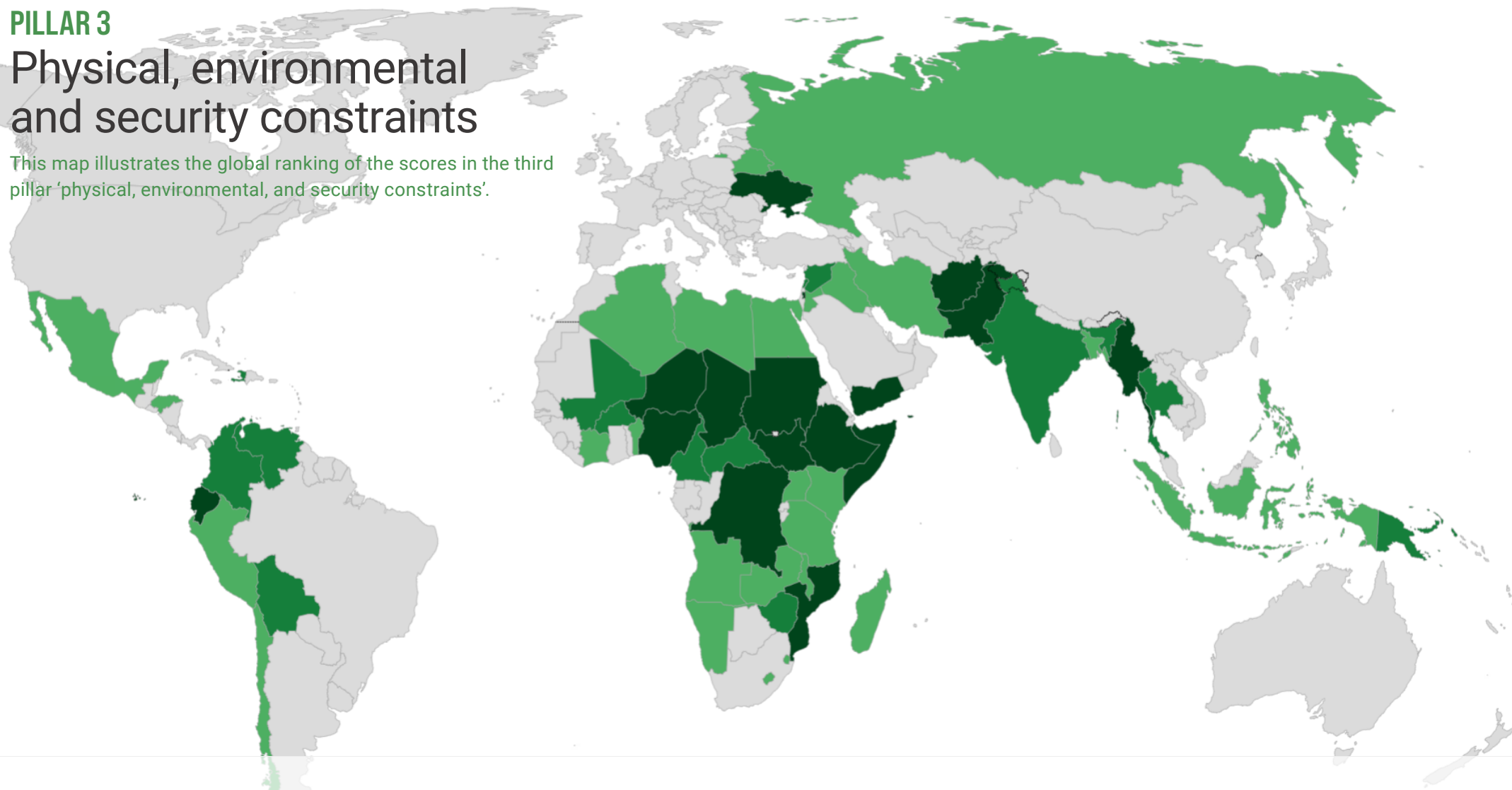
PILLAR 1   PILLAR 2   **PILLAR 3**

- Ongoing insecurity or hostilities affecting humanitarian assistance.
- Presence of landmines, improvised explosive devices (IEDs), explosive remnants of war (ERW), and unexploded ordnance (UXOs).
- Physical constraints in the environment (obstacles related to terrain, climate, lack of infrastructure, etc.).

Ranking

- ● Extreme access constraints
- ● Very high access constraints
- ● High access constraints
- ● Moderate access constraints
- ● Low access constraints
- ● No significant access constraints

Date created: 04/08/2025

ACCESS INDICATORS

Indicator	Afghanistan	Algeria	Angola	Bangladesh	Belarus	Benin	Bolivia	Burkina Faso	Burundi	Cameroon	CAR	Chad	Chile	Colombia	Costa Rica	Côte d'Ivoire	Djibouti	Dominican Republic	DPRK	DRC	Ecuador	Egypt	El Salvador	Eritrea	Eswatini	Ethiopia	Greece	Guatemala	Haiti	Honduras	India	Indonesia	Iran	Iraq	Italy	Jordan
Overall humanitarian access score	4	2	1	2	2	1	2	4	1	3	3	3	1	3	1	1	1	1	2	4	3	3	1	2	1	4	2	1	3	2	3	3	4	4	2	2
Denial of existence of humanitarian needs or entitlements to assistance	2	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	2	0	2	0	0	0	2	0	0	2	2	0	2	2	3	2	2	0	0	0
Restriction and obstruction of access to services and assistance	3	1	0	2	0	0	0	2	1	2	2	1	2	1	0	2	0	2	2	2	3	0	2	0	2	3	0	2	2	3	2	3	3	2	2	1
Impediments to enter the country	2	2	0	1	1	0	1	1	0	2	1	0	0	0	0	0	0	0	1	1	0	1	2	1	1	1	1	2	1	0	2	1	1	1	0	1
Restriction of movement within the country	2	1	0	1	0	0	0	3	0	3	3	3	0	3	0	0	0	0	2	3	0	0	1	1	0	3	1	0	3	1	2	2	3	1	1	0
Interference into implementation of humanitarian activities	3	1	0	2	1	0	1	3	0	2	1	1	0	1	0	0	0	1	3	1	1	1	1	1	0	1	1	0	2	1	2	2	2	1	1	1
Violence against humanitarian personnel, facilities, and assets	0	0	0	0	0	0	0	0	0	2	2	0	0	0	0	0	0	0	0	3	0	0	0	0	0	3	0	0	1	0	0	0	1	0	0	0
Insecurity or hostilities affecting humanitarian assistance	2	0	0	1	0	2	0	3	0	3	3	3	0	1	0	0	0	0	0	3	2	0	0	0	0	2	0	0	3	1	2	2	0	0	0	0
Presence of landmines, IEDs, ERW, and UXO	3	1	2	1	3	1	3	1	0	0	1	3	2	2	0	3	0	0	2	3	2	3	0	2	0	2	0	0	0	0	0	0	1	3	0	2
Physical constraints in the environment	3	2	2	1	0	1	3	1	1	3	2	3	1	3	2	1	0	2	1	3	3	0	0	3	3	0	0	3	3	3	1	2	1	1	1	1

Indicator	Kenya	Lebanon	Lesotho	Libya	Madagascar	Malawi	Malaysia	Mali	Mauritania	Mauritania	Mexico	Moldova	Morocco	Mozambique	Myanmar	Namibia	Niger	Nigeria	Pakistan	Palestine	Panama	Papua New Guinea	Peru	Philippines	Russia	Rwanda	Senegal	Somalia	South Sudan	Spain	Sudan	Syria	Tanzania	Thailand	Togo	Trinidad and Tobago	Tunisia	Türkiye	Uganda	Ukraine	Venezuela	Yemen	Zambia	Zimbabwe
Overall humanitarian access score	2	4	1	4	2	2	2	4	1	2	2	1	2	3	5	1	3	5	4	5	1	3	1	2	3	1	1	4	4	0	5	4	2	3	1	0	3	3	2	5	3	5	1	2
Denial of existence of humanitarian needs or entitlements to assistance	1	2	0	2	0	0	2	2	0	0	0	0	0	0	3	0	0	1	2	3	0	0	0	0	3	0	0	0	0	0	3	0	0	2	0	0	2	2	0	2	1	0	2	0
Restriction and obstruction of access to services and assistance	2	3	0	3	0	0	3	2	0	3	0	1	1	2	3	0	0	3	3	3	0	2	1	0	2	0	0	3	3	0	3	3	0	2	0	0	3	3	0	3	3	3	0	0
Impediments to enter the country	0	1	0	2	1	0	1	0	0	0	0	0	2	1	1	0	1	2	2	1	0	3	1	1	0	1	2	1	1	0	2	1	1	1	1	0	0	1	0	2	0	2	1	2
Restriction of movement within the country	0	1	0	3	2	1	2	0	0	0	2	0	0	3	3	0	3	3	2	3	1	2	0	1	1	1	0	3	3	0	3	3	1	0	0	0	1	0	0	3	2	3	0	1
Interference into implementation of humanitarian activities	0	1	0	0	0	0	0	1	0	0	0	0	0	1	3	0	0	3	0	3	0	0	0	0	0	0	0	3	3	0	3	3	0	0	0	0	0	0	0	3	0	3	0	0
Violence against humanitarian personnel, facilities, and assets	3	2	1	0	0	0	0	3	0	0	1	0	0	3	3	0	2	3	0	3	0	0	0	0	0	0	0	3	3	0	3	0	0	0	0	0	0	0	0	3	0	3	0	0
Insecurity or hostilities affecting humanitarian assistance	0	3	0	3	0	0	0	3	0	0	1	0	0	3	3	0	2	3	2	3	0	0	0	1	3	0	0	3	3	0	3	3	0	3	0	0	0	1	1	3	1	3	0	2
Presence of landmines, IEDs, ERW, and UXO	1	1	0	1	3	3	0	2	0	0	2	1	0	2	3	3	3	3	3	3	1	1	2	3	1	0	1	3	3	0	3	1	3	0	0	0	1	0	3	3	3	3	3	3

MYANMAR

Score: 5

Humanitarian access in Myanmar remains severely restricted, driven by a combination of state-imposed bureaucratic barriers, deliberate access denial by the military, widespread insecurity caused by both state and non-state armed groups (NSAGs), and natural hazards. Since the military coup in 2021, the country has been fragmented, with the junta controlling only parts of the territory while large areas remain under the influence of ethnic armed organisations and the People's Defence Force (OCHA 13/12/2024). This fragmentation complicates humanitarian operations, as access negotiations vary across regions and different authorities often impose restrictions, reducing coordination and leading to inconsistent access and logistical challenges (OCHA 22/07/2025; IISS 09/07/2024). The 2022 Organization Registration Law, enacted by the State Administration Council (SAC), required all NGOs and civil society organisations, including those already operating, to register within 60 days of its enactment, with criminal penalties for non-compliance. Organisations previously registered under the 2014 Association Registration Law were allowed to operate until their certificates expired but must re-register under the new law, which is more complex, time-consuming, and politically fraught. It requires multiple approvals and, for INGOs, mandates that 40% of executive members be Myanmar nationals. This requirement functions as a tool of political control, enabling the junta to influence internal decision-making, monitor operations more closely, and undermine organisational independence (ICNL accessed 15/06/2025).

In December 2024, the SAC further imposed new financial restrictions on NGOs, raising the minimum bank balance from MMK 100,000 (USD 50–100) to MMK 15–100 million (USD 3,400–23,000) and requiring organisations to retain 70% of funds in state-run banks while capping operational spending at 30% (ICNL accessed 15/06/2025). These measures will likely tighten financial control and increase state oversight of NGO operations, allowing the junta to freeze funds, delay transfers, and scrutinise spending, further limiting the effectiveness of civil society organisations.

The SAC also imposes administrative restrictions on relief good imports and staff visas, making them subject to opaque, shifting policies (Fulcrum 23/03/2022 and 13/12/2024). At the same time, political considerations can result in aid being withheld from opposition-held areas as a form of collective punishment. After the March 2025 earthquake, restrictions such

as delayed cross-line access and challenges in obtaining emergency import approvals and travel authorisations hindered the provision of life-saving assistance (ICG 18/06/2025; OCHA 22/07/2025; IDS 14/04/2025; HRW 01/04/2025; Peace & Humanity 06/2025).

Checkpoints and roadblocks, especially in states such as Chin, Kachin, and Rakhine, routinely delay or prevent humanitarian delivery (OCHA 13/12/2024 and 19/02/2025). The Rohingya, in particular, face compounded restrictions owing to their statelessness; they are often barred from moving between or within townships without documentation, risking arrest or extortion. In besieged camps, freedom of movement is virtually nonexistent, preventing people from seeking livelihoods, accessing markets, or relocating to safer areas. This deepens dependence on humanitarian assistance and obstructs self-reliance during crises (HRW 2025 a and 11/06/2022; OCHA 13/12/2024).

READ MORE ABOUT MYANMAR

NIGERIA

Score: 5

Humanitarian access in Nigeria remains highly constrained owing to insecurity, particularly in North Central, North East, and North West Nigeria (OCHA 23/01/2025). BAIs persist, limiting humanitarian access especially in the northeast, where decades of conflict have caused widespread displacement and humanitarian needs. Procedures such as NGO registration, visa acquisition, and work permit application are often described as complex, opaque, and protracted. In May 2025, delays in obtaining the National Drug Law Enforcement Agency clearance for transporting medical supplies hampered the timely delivery of essential health commodities. In general, aid organisations report lengthy delays resulting from overlapping regulations, unclear responsibilities across federal and state levels, and inconsistent enforcement by relevant authorities. This fragmentation contributes to inconsistent enforcement and procedural variability across states, complicating operational planning and predictability for humanitarian responders (OCHA 23/01/2025 and 16/02/2023; ICNL accessed 05/08/2025; Logistics Cluster 13/03/2025). These delays are particularly disruptive during emergency response efforts, such as seasonal floods, when rigid compliance requirements often stall time-sensitive interventions.

Nigeria has a history of suspending or deregistering INGOs, often citing national security, political neutrality, or procedural noncompliance as reasons. Authorities have accused aid organisations of operating without proper registration, engaging with NSAGs, or interfering in internal affairs (Africa Press 03/10/2019; TRF 25/09/2019). While the Government presents these measures as necessary for maintaining national security and regulatory compliance, some humanitarian responders view them as restrictive and potentially influenced by political considerations. These actions reflect a broader trend of increasing government scrutiny of NGO operations. The May 2025 directive for the International NGO Safety Organisation (INSO) to cease operations and exit the country underscores how government scrutiny of NGOs can swiftly escalate into full operational shutdowns. The State expelled INSO over alleged political affiliations and concerns about impartiality. The organisation's departure disrupted access to crucial safety information, hindering collective risk management and informed decision-making on movement and access in high-risk areas (African Health Report 31/05/2025; HumAngle 03/06/2025).

Importing humanitarian supplies also remains a major challenge. Organisations face inconsistent customs procedures, contradictory regulations between donors and host authorities, and repeated demands for unofficial fees. Minor documentation discrepancies frequently delay shipments for weeks (Logistics Cluster 20/02/2025; US DOS accessed 03/07/2025). In conflict-affected areas, the mandatory use of military escorts, particularly in the northeast, further undermines humanitarian neutrality. This practice can strain access negotiations with communities who may perceive aid responders as aligned with the military or one side of the conflict. Organisations report long waits for escorts, especially for smaller convoys, often resulting in cancelled distributions and interrupted service delivery (Logistics Cluster 20/02/2025; OCHA 06/06/2024 and 20/06/2017; NRC 17/02/2017).

READ MORE ABOUT NIGERIA

PALESTINE

Score: 5

Israeli military operations, interference in humanitarian operations, and severe infrastructure damage continue to extremely constrain humanitarian access in Gaza and the West Bank. Since 7 October 2023, Israel has intensified bureaucratic and administrative restrictions across these territories, severely disrupting humanitarian operations. On 9 March 2025, a new Israeli law issued by the Knesset required all NGOs operating in Gaza and the West Bank to reapply for registration. While no major INGOs have been formally rejected, the law allows applications to be denied based on vague political or security criteria, including past support for boycotts or legal action against Israeli personnel (SARI Global 16/03/2025). Israeli authorities have maintained opaque visa procedures for international staff, particularly those in senior humanitarian, advocacy, and coordination roles, with many applications left unanswered (European Parliament 15/04/2025; RFI 10/03/2024). Aid organisations are also required to submit detailed personal data for their Palestinian staff, including names, identification numbers, and contact information, heightening security concerns for national staff, including risks of surveillance or reprisals (TWP 15/03/2025).

In Gaza, restrictions peaked on 2 March 2025 with a blockade on aid, fuel, and commercial goods, the longest since 7 October 2023, causing severe shortages of food, medicine, and other basic services (UN 28/04/2025; WHO 12/05/2025). Similarly, entry permits for aid trucks were largely reduced. Between December 2024 and May 2025, out of an estimated 1,335 coordinated aid movement attempts across Gaza, primarily led by the UN and INGOs, 46% were denied by Israeli authorities, 13% were impeded (significantly delayed or partially obstructed, often at checkpoints), 34% were facilitated, and 7% were cancelled or withdrawn by organisers for logistical, operational, or security reasons (OCHA accessed 08/07/2025). In the West Bank, Israel has enforced a ban on UNRWA, which forced it to evacuate its international staff from East Jerusalem to Amman and cease operations by 30 January, further worsening the living conditions of at least 1.1 million people in the West Bank and Jerusalem (UNRWA 26/01/2025; ARDD 03/02/2025). This move reflects escalating tensions around the agency's role and the humanitarian mandate in contested territories. Only UNRWA schools remain operational in the West Bank, providing education, healthcare, and other services, and they are operating at reduced capacity owing to chronic funding shortfalls and understaffing (UNRWA 27/06/2025).

In the coming six months, short-term ceasefire agreements may temporarily ease access constraints in Gaza, allowing limited aid delivery. Otherwise, BAIs are likely to persist or tighten further in both Gaza and the West Bank because of stalled negotiations, weak international influence on Israeli decisions, and continued fighting.

READ MORE ABOUT PALESTINE

SUDAN

Score: 5

Escalating conflict and factional control by the Sudanese Armed Forces (SAF) and Rapid Support Forces (RSF) have extremely constrained Sudan's humanitarian access since April 2023, with both groups imposing significant BAIs on humanitarian organisations.

In May 2025, SAF-aligned authorities, particularly the Humanitarian Aid Commission, suspended 30 national and three international NGOs in the Nuba Mountains, South Kordofan, citing procedural violations such as operating without renewed registration or failing to coordinate with regional authorities (OCHA 29/05/2025). This suspension aligns with a broader trend of SAF restricting humanitarian presence in opposition-held or strategically contested areas, using administrative tools to consolidate territorial control. SAF further hinder operations through frequent visa and travel permit rejections for international staff, often attributed to security or opaque vetting (IRC 09/04/2025; TNH 11/04/2025). In May 2025 alone, SAF approved only 31% of 400 visa requests, hampering surge capacity and delaying critical deployments.

The Sudanese Agency for Relief and Humanitarian Operations, an RSF-aligned authority, has introduced new regulations in RSF-controlled areas, mainly Darfur and Kordofan, imposing re-registration, the pre-approval of project plans, movement tracking, and limits on subcontracting local responders (OCHA/UN RC/HC Sudan 10/02/2025; OCHA 29/05/2025). These measures have led to delays in activity start-up, stakeholder withdrawals, and the suspension of at least one nutrition programme in Central Darfur owing to lack of movement clearance (OCHA/UN RC/HC Sudan 10/02/2025). The restrictions reduce flexibility and undermine response capacity in at-risk areas and those classified to face Famine , including parts of Al Jazirah, Darfur, and Kordofan between December 2024 and May 2025 (OCHA/UN RC/HC Sudan 10/02/2025; IPC 24/12/2024).

Administrative refusals from both SAF and RSF continue to obstruct humanitarian operations. RSF authorities are more frequently reported to mandate stakeholder substitutions and modify aid recipient lists, while SAF have more commonly blocked assessments or denied activity clearances (OCHA 29/05/2025 and 12/01/2025; AJ 28/05/2025). In response, UN agencies and INGOs are engaging in quiet negotiations and collective advocacy through humanitarian coordination platforms to secure access and resist politically motivated interference.

READ MORE ABOUT UKRAINE

UKRAINE →

Score: 5

In Ukraine, the Russian invasion that began in 2014 has driven extreme humanitarian access constraints, particularly since the onset of the full-scale invasion in 2022, with the access score staying at the highest level since. Humanitarian organisations can register in accordance with national legislation, specifically the Law on Organisations, and aid organisations, both national and international, are operational in the country (GOU accessed 29/05/2025; OCHA 29/05/2025). But while there are no BAIs limiting humanitarians from reaching people in need in Ukrainian-controlled territories, the broader operational environment remains challenging, particularly near the front line, because of insecurity, military procedures, and occupation-related policies (OCHA 03/07/2025).

Martial law has also been in place since the full-scale Russian invasion in 2022, and military checkpoints have been set up across the country, including in the highest-risk areas near the front line, hampering humanitarian access and movement for male responders subject to mobilisation (Ukrinform 16/04/2025; OCHA 08/05/2025). It takes time for national humanitarian staff ages 25–60 to attain military exemption, with some not being granted per the criteria, which can constrain the response (OCHA 19/03/2025; TKI 16/12/2024). The access of humanitarian responders to the most insecure villages and communities near the front line and the border with the Russian Federation requires prior security-related authorisation from the Government of Ukraine, with insecurity being the main constraint to accessing these areas (KII 09/04/2025; KII 28/01/2025; ACAPS 08/05/2025).

The access of humanitarians to Russian-occupied areas across Donetska, Khersonska, Luhanska, and Zaporizka oblasts and the Crimea Peninsula remains closed despite the readiness of some organisations, such as the UN, to deliver aid there since at least 2022, severely restricting independent response (OCHA 29/05/2025; UN 21/02/2025 and 31/03/2022). The Russian authorities have continued to use coercive measures to consolidate occupation since 2014. They block those who do not accept and are unable to show Russian passportisation from accessing essential services, including medical assistance (Forbes Ukraine 20/03/2025; HRW 25/03/2025; KII 10/04/2025). The reported denial of services based on passport or residency status under occupation also raises operational and ethical concerns, particularly around equitable access and humanitarian principles.

Note: for more details, read ACAPS Ukraine Analysis Hub's latest Quarterly Humanitarian Access Update for the first quarter of 2025 here.

READ MORE ABOUT UKRAINE

YEMEN

Score: 5

Humanitarian access in Yemen remains extremely constrained, especially in areas under the control of the de-facto authority (DFA) in the north of Yemen (also known as the Houthis), because of BAIs, programmatic interference, localised conflict, and overall fragmented governance (UNSC 21/03/2025; OCHA 15/01/2025).

In DFA-controlled areas, opaque and inconsistently applied procedures, including demands for the pre-approval of staff hiring, forced stakeholder changes, and aid recipient list manipulation restrict the humanitarian operating environment. The DFA often enforces these requirements arbitrarily, with applications frequently rejected in Sana'a and Sa'dah (HRW 2025 b; Oxfam 26/03/2025; OCHA 15/01/2025). Visa delays for international staff also limit response capacity (OCHA 15/01/2025).

The difficult operating environment compounded by the January 2025 US designation of the DFA as a Foreign Terrorist Organization (FTO), which triggered funding suspensions and heightened legal risks, has led to reduced or suspended operations by several US-funded INGOs and UN agencies in DFA-held governorates. While BAIs imposed by the DFA contribute to the constraints, the operational shutdowns are primarily the result of donor compliance concerns and legal prohibitions linked to the FTO designation (WFP 30/06/2025; Oxfam 26/03/2025; UN 10/02/2025).

DFA-enforced Mahram rules, which require women to travel with a male guardian in DFA-controlled areas, restrict women's access to work and aid delivery (Amnesty International 28/04/2025). In response, some aid organisations have suspended female-led programming, facilitated the presence of male family members or male colleagues to enable female staff and crisis-affected people to travel and access services, or shifted responsibilities to male staff, affecting programme quality and gender-sensitive service delivery (Al-Refaei 18/11/2024; Reuters 23/03/2023; Amnesty International 01/09/2022). These BAIs limit data collection and aid delivery, hindering needs assessments and deepening humanitarian needs (Sida 31/03/2025).

The complex permit processes imposed by the Internationally Recognized Government of Yemen (IRG) in Aden and Ma'rib delay registrations, while conflicting requirements between federal and governorate-level authorities and among different IRG ministries have led to policy misalignments, increasing operational costs and delaying activity approvals since 2020 (INTERSOS 24/04/2024; ICNL accessed 15/06/2025; Doctors of the World 02/06/2025).

READ MORE ABOUT YEMEN

HUMANITARIAN ACCESS

VERY HIGH CONSTRAINTS

AFGHANISTAN

Score: 4

Afghanistan continues to experience high levels of humanitarian access constraints because of interference and restrictions, such as regulatory overreach, gender-based restrictions, requests for access to sensitive data by the Interim Taliban Authority (ITA) in humanitarian activities, and violence against aid workers and assets.

The ban on female local and international NGO workers, enforced since December 2024, has disrupted the rollout of essential humanitarian assistance and aid programmes, especially those serving women and children, as some organisations have been suspended or scaled back, while others continue with adjusted modalities. Protection, health, and nutrition are the sectors most affected by this ban, which has caused several NGOs to halt their activities in Afghanistan (UN 01/05/2025; ICTJ 31/12/2024; AJ 30/12/2024 and 29/12/2022; Arab News 02/01/2025; DW 25/12/2022). Women face difficulties in accessing assistance, including delays in obtaining a national identity card, mobility restrictions, and the Mahram requirement for long-distance travel of over 72km, as per an official directive still in effect in 2025 (AP 18/03/2025; Kashmir Observer 02/01/2025; CIVICUS 21/02/2025). The Afghan national identity card, known as the Tazkira or its electronic version (e-Tazkira), is often required to access services (BU 27/11/2024; TC 20/12/2024).

Humanitarian organisations often report coercion by local ITA officials across the country, especially by the Ministry for the Propagation of Virtue and the Prevention of Vice, including interference in staff recruitment and demands for access to sensitive data, such as lists of people receiving assistance, budget details, procurement details, and staff salary (OCHA 18/02/2025 and 19/03/2025; KN 19/02/2025; SATP 26/05/2025). Burdensome customs processes, high fees, and permit requirements that restrict movement hinder aid distribution. Visa approvals for international staff are often delayed or denied without justification. Temporary border closures, particularly with Pakistan (Torkham), and the need for multiple local approvals obstruct the delivery of cross-border relief supplies (WFP 12/05/2025; KN 22/03/2025).

The ITA's enforcement of the Propagation of Virtue and Prevention of Vice Law, as well as their threats towards noncompliant organisations, has significantly increased operational risks, costs, and logistical constraints. This law intersects with aid delivery in several ways, such as by limiting women's ability to work in NGOs, enforcing gender segregation, and enabling intense scrutiny of humanitarian responders. These restrictions disrupt field operations, increase logistical barriers, and undermine access to services for the most affected groups – especially women and girls who rely on female staff for safe access to aid (HRW 2025 c; ECHO 19/12/2024; OCHA 19/12/2024; WB 21/03/2025; Consulate General of the Islamic Republic of Afghanistan in Munich accessed 03/07/2025).

READ MORE ABOUT AFGHANISTAN

BURKINA FASO

Score: 4

The humanitarian access situation in Burkina Faso remains highly constrained. Armed group activity and insecurity along key routes have obstructed aid delivery, while BAIs also significantly affect operations and assistance. BAIs imposed by both local and central government institutions have led to delays and operational inefficiencies. In 2025, clusters such as WASH and Health have continued to report difficulties in programme implementation owing to slow and inconsistent administrative approvals (UNICEF 09/06/2025). The suspension of at least one INGO by national authorities in 2025, without public justification and with limited institutional response, further illustrates the risk of programmatic interference in a context where the rationale for such decisions remains opaque. While the reasons for the suspension were not officially disclosed, the lack of transparency has raised concerns of political motivation (Insecurity Insight 02/07/2025).

In 2025, the Ministry of Economy and Finance reinstated a mandatory registration process for all NGOs operating in the country — both national and international — with noncompliance potentially leading to sanctions. This measure does not apply to UN agencies (LeFaso. net 21/03/2025). While no comprehensive figures are available on its operational impact, organisations have reported increased delays in registration and the need for repeated engagement with authorities. Public narratives — including media reports and official statements portraying humanitarian responders as biased or politically compromised — have also fuelled distrust, particularly in areas under state influence. This further complicates operations by affecting community acceptance and increasing reputational risks to aid organisations (Insecurity Insight 25/06/2025).

Among affected populations, access to humanitarian assistance often hinges on the possession of civil documentation. Regional assessments indicate that a significant proportion of IDPs and refugees lack valid identification across the Sahel, particularly in areas under the control of NSAGs, affecting their ability to access healthcare, education, and livelihood support (UNHCR 26/05/2025). Although some initiatives have sought to address this issue, the lack of civil registration infrastructure and the loss of documents during displacement continue to limit access to services (OCHA accessed 28/07/2025; EC 05/04/2023).

READ MORE ABOUT BURKINA FASO

DEMOCRATIC REPUBLIC OF CONGO

Score: 4

Humanitarian access remains highly constrained in the DRC. While insecurity remains the primary obstacle, armed group activity, intercommunal violence, and military operations severely limit the movement of both humanitarian responders and affected populations, particularly in eastern provinces (OCHA 21/07/2025; UNICEF 22/05/2025; GCR2P 15/07/2025).

BAIs also contribute to operational delays and inefficiencies, especially in Ituri and Nord-Kivu. Available information on BAIs is limited and scattered, and broader access constraints often overshadow the issue. Approval processes are often slow and inconsistent at both national and local levels, with overlapping mandates sometimes creating confusion or delays. Humanitarian responders report that delays in project validation and in the issuance of travel permits by both national and local authorities hinder programme implementation (UNFPA 18/03/2025; IOM 05/06/2025). Local-level administrative interference, such as informal checkpoints, arbitrary inspections, and the imposition of unofficial fees on aid deliveries by both official and non-state groups compound these challenges (UNHCR 22/04/2025; NRC/USAID 28/12/2023).

Import procedures also remain unclear and burdensome, particularly for the customs clearance of humanitarian goods, resulting in delays and increased costs. In some cases, these constraints have affected the timely delivery of medical supplies and shelter kits (Logistics Cluster 18/03/2025). At the community level, feedback mechanisms reveal perceptions of politicisation and preferential treatment in aid distribution, particularly in contested areas. In certain locations, these perceptions have contributed to community mistrust and increased tensions around aid convoys, raising operational risks (IOM 18/03/2025).

The establishment of a parallel administration by the March 23 Movement in parts of Nord-Kivu and Sud-Kivu in early 2025 signals increasing complexity in the administrative processes governing aid delivery in the DRC. While information remains limited on how this takeover is affecting BAIs, it raises concerns about potential new layers of access constraints (UN 27/03/2025; IPIS 12/06/2025).

READ MORE ABOUT DRC

ETHIOPIA

Score: 4

A combination of armed conflict and poor infrastructure, heightened by seasonal impediments such as flooding and restrictive government protocols, constrains humanitarian access in Ethiopia, particularly in parts of Amhara, Benishangul Gumuz, and Oromia regions (REACH 09/05/2025; OCHA 11/07/2025).

The insufficient consolidation of government presence in the areas contested between Tigray and Amhara creates a challenging environment for humanitarian aid. The presence of differing administrations in these areas has hindered or delayed humanitarian aid delivery to the affected population given a lack of coordination and approval mechanisms (Protection Cluster 14/04/2025). This has affected bureaucratic processes and fragmented the region's security landscape. A fragmented security landscape and bureaucratic processes require extensive negotiations with various state and non-state parties, leading to persistent aid delivery delays (TNH 04/03/2025; ACSS 24/03/2025). In Amhara, NSAGs have maintained presence in parts of the region, particularly in the Gojam, Gondar, Shewa, and Wello zones, making negotiations with humanitarians necessary (Geremedhn and Gebrihet 20/11/2024; Borkena 04/06/2025 and 02/07/2025; TNH 12/11/2024).

Civil society organisations (CSOs), including humanitarian ones, continue to face restrictive requirements for registration, bank account approvals, and reporting, while authorities retain the right to investigate activities based on vague criteria (ICNL accessed 10/07/2025; Logistics Cluster accessed 10/07/2025). In 2024, Ethiopia's Authority for Civil Society Organizations (ACSO) reportedly deregistered over 1,500 CSOs and suspended several human rights organisations based on vague allegations such as "lack of political impartiality" and "engaging against national interests" though it is unclear to what extent organisations with humanitarian programmes have been affected (HRW 29/01/2025; AS 26/12/2024; The Reporter 05/07/2025; and 28/12/2024). In 2025, a new draft amendment to Ethiopia's civil society law also proposed significant new powers for the ACSO – including the ability to immediately suspend organisations and ban foreign and foreign-established organisations – that could significantly restrict the operational space for NGOs if ratified (AI 18/08/2025; OMCT 02/07/2025; FIDH 02/07/2025). By July, the proposed law had yet to go through its formal legislative process, and its ratification time frame remained uncertain. The extent to which the ACSO directives affected humanitarian organisations during the period is unclear (FIDH/OMCT 19/07/2024; EHRC 03/03/2025).

READ MORE ABOUT ETHIOPIA

IRAQ

Score: 4

Iraq continues to face dual access constraints: state-imposed BAIs and the social exclusion of displaced communities perceived to be affiliated with the Islamic State of Iraq and the Levant, particularly Sunni Arab IDPs, which together significantly hinder humanitarian operations (UNHCR 31/12/2024 and 17/12/2024).

INGO registration faces delays owing to opaque and inconsistent procedures in Baghdad and the Iraqi Kurdistan Region (IKR), which frequently report unofficial fees (ICNL accessed 02/07/2025; Freedom House accessed 13/06/2025; US DOS 20/03/2023). To navigate this environment, INGOs have increasingly relied on leveraging local partnerships, inter-NGO coordination, and the employment of dedicated staff or units for liaison with government ministries and departments responsible for NGO registration.

Beyond general registration, INGOs are often required specific No Objection Certificates or access letters from various federal, regional, or local authorities to operate in areas such as Ninewa, Sinjar, and parts of Kirkuk and Diyala – requirements that are more consistently enforced in federal Iraq than in IKR, where procedures tend to be more streamlined (ICVA accessed 28/07/2025; SCR 01/06/2025). Delays or denials in obtaining these permissions effectively hinder access to newly established civil society organisations. Visa restrictions for international staff further constrain human resource management, limiting organisations' ability to maintain programme continuity, deploy surge support in emergencies, and conduct timely monitoring and oversight missions (TTW 13/06/2025).

Checkpoints at IKR–Federal Iraq borders delay the domestic movement of people in need. In these checkpoints, name-based bans drawn from formal security watch lists but inconsistently applied delay or deny access to camps in Erbil and Ninewa for individuals with perceived ISIS affiliation (CSIS 20/03/2023). IDPs in this category require civil documentation, often unavailable owing to confiscation during displacement or fear of arrest when attempting to replace them. By December 2024, around 15,000 individuals in Khazer M1 camp were experiencing limited access to services, including healthcare, food assistance, and civil registration (UNHCR 17/12/2024).

READ MORE ABOUT IRAQ

LEBANON

Score: 4

Humanitarian access constraints, particularly for certain population groups, continue to be very high across Lebanon, mainly owing to infrastructure damage from Israeli air strikes between September–November 2024, besides government policies that restrict movement and access to service for Syrian refugees. The enforcement of legal residency requirements has increasingly limited Syrian refugees' freedom of movement, access to services, and ability to secure housing or employment in Lebanon. The latest data from 2024 shows that only 18% of Syrian households have legal residency, and 93% have at least one member in their household lacking legal residency (UNHCR 16/04/2025). Following the ceasefire between Lebanon and Israel in November 2024, Lebanese authorities sharply increased the enforcement of residency rules, driven by political concerns over informal returns and shifting regional dynamics after former Syrian president Bashar Al Assad's fall. This has resulted in movement restrictions, arrests at checkpoints, and difficulties in renewing legal documents, leaving many Syrians exposed to forced deportation or arbitrary detention (UNHCR 16/04/2025; 3RP 16/03/2025). After the ousting of Al Assad's Government on 8 December, more deportations of Syrians lacking legal residency are likely, as the Lebanese Government considers the causes of their displacement from Syria to be mostly resolved, although there are no documented forced deportations yet in 2025 (TIMEP 01/05/2025; AJ 18/05/2025; Asharq Al-Awsat 08/06/2025). Lack of documentation is also restricting Lebanese access to housing, mainly returnees displaced by the escalation of clashes between Hezbollah and Israel. They struggle to prove homeownership, renew leases, or secure new housing (UNHCR 16/04/2025). By June, over 981,500 had returned to their communities, while 82,600 continued to be displaced, mostly in Sour and Nabatiye governorates (IOM 05/06/2025).

For local and international NGOs, Lebanon's 1909 Law on Associations remains a key administrative barrier. While most humanitarian organisations working with Syrian refugees continue to operate freely, the registration process involves complex documentation and security checks. Syrian-led NGOs and organisations advocating for IDPs or minority rights are especially subject to interference, including registration delays or denial, increased scrutiny by security groups, and occasional threats of suspension or shutdown (Freedom House accessed 30/06/2025). For example, UNHCR has suspended the new registration of Syrian refugees since 2015 per the Government's orders, limiting their ability to identify and assess new arrivals (UNHCR accessed 30/06/2025).

READ MORE ABOUT LEBANON

LIBYA

Score: 4

The main drivers of humanitarian access restrictions in Libya are the arbitrary detention of migrants by authorities and BAIs hindering their movement and access to key services. After the suspension of ten INGOs, including Médecins Sans Frontières, the Norwegian Refugee Council, and UNHCR, an increase in BAIs has further deteriorated access in the country. Their suspension resulted from accusations by the Government of National Unity that they facilitated the resettlement of sub-Saharan African migrants, which it claimed was a threat to national demographics. On 2 April 2025, Libya's Internal Security Agency ordered the suspension because of alleged financial irregularities, likely marking a broader policy shift rather than isolated incidents (SOS Mediterranee 24/04/2025; IM 03/04/2025; MSF 24/06/2025). These organisations faced office closures, the freezing of their bank accounts, and the interrogation and harassment of their staff amid accusations that their work promoted "Christian, atheist and homosexual values" contrary to Libyan identity (SOS Mediterranee 24/04/2025).

Between October–December 2024, organisations reported eight BAIs that included inconsistencies in security clearances leading to the cancellation of activities (OCHA 27/02/2025). This represents a slight deterioration from the July–September 2024 period, which saw six BAIs, but remains a significant improvement from the second half of 2023, when 25 incidents were documented (OCHA 22/01/2024 and 15/11/2024). The mid-2024 decline likely reflects a temporary improvement in coordination following the end of the major flood response in Derna.

Law 19/2001, in place since Muammar Gaddafi's rule, restricts organisations' activities to narrowly defined fields and grants authorities the power to dissolve them without court orders. Under this framework, the Commission for Civil Society can inspect, delay, or revoke the registration of national and international organisations, often requiring security group approval before granting legal status (HRW 27/01/2025; Freedom House accessed 05/07/2025). The compounded effects of these measures and restrictive legal frameworks increase the barriers to the delivery of essential services to people in need. In practice, some organisations are unable to open bank accounts, forcing them to rely on personal channels for transactions; salary payments can be delayed for up to seven months, and some banks reportedly demand bribes. Together, these conditions foster a hostile operating environment, especially for independent and rights-based organisations (HRW 27/01/2025).

READ MORE ABOUT LIBYA

SOMALIA

Score: 4

Somalia continues to experience high levels of humanitarian access constraints. Humanitarian organisations face complex and overlapping registration procedures at both federal and state levels, often involving multiple ministries, such as the Ministry of Planning, the Ministry of Interior, Federal Affairs & Reconciliation, and, in some states, line ministries linked to sectoral approvals. These fragmented processes result in duplicative reporting requirements and frequent delays in project implementation (MOIFAR accessed 02/07/2025; ICNL accessed 05/08/2025). While there have been limited discussions around harmonising registration, mostly donor-driven through coordination platforms, no formal reform has been enacted. Challenges differ by region: in Somaliland and Puntland, parallel administrative systems require separate registration, while in the southern states, coordination with both federal and state authorities is often necessary. INGOs tend to face more delays than national counterparts, especially in securing federal-level approvals and renewing annual permits.

Customs clearance poses a significant challenge, especially at Mogadishu's seaport and airport, where delays and demurrage are common (Logistics Cluster 22/03/2024). The import process involves multiple government ministries, and procedural changes are frequently introduced without prior communication with humanitarian responders, leaving little time for adaptation and causing supply chain disruptions (Logistics Cluster accessed 02/07/2025; Logistics Cluster 22/03/2024). While some humanitarian responders have engaged in collective advocacy through logistics working groups and UN-led coordination platforms, progress has been limited, particularly at key entry points, such as seaports and airports, where ad hoc enforcement and lack of centralised guidance continue to create bottlenecks. In Puntland, the inconsistent application of tax exemptions and delayed ministerial approvals further compound the situation, severely affecting the importation of medical and essential goods (Logistics Cluster 03/03/2025).

Programmatic interference remains the most persistent constraint. Reports rose from 62 incidents in 2023 to 71 in 2024, indicating a sustained, if gradual, increase in interference (OCHA 25/07/2023, 01/01/2024, and 22/01/2025). The period July to September 2024 alone recorded 22 incidents, suggesting a possible acceleration in the second half of the year. These incidents included arbitrary demands for project data in Banadir region and Jubaland state, license revocations in Somaliland, and permit denials linked to disputes over trainee selection.

In several cases, these actions led to the suspension of operations and significant delays in planned aid interventions, with delays ranging from a few days to as long as six months. Persistent interference of this nature also forced the relocation of humanitarian activities in regions such as Galgaduud, Gedo, and Middle Shabelle, disrupting the continuity of assistance and straining already limited resources (OCHA 30/09/2024).

Only eight interference incidents were reported between January and April 2025, mostly in Banadir, Gedo, and Woqooyi Galbeed regions. However, local authorities are increasingly seeking control over staff recruitment and stakeholder selection, whether subcontracted organisations or members of consortia, undermining neutrality and compromising the independence of humanitarian action. Interference in humanitarian operations and other bureaucratic impediments increase operational costs and restrict access to life-saving assistance for people in need. The impact is particularly pronounced in semi-autonomous regions, such as Puntland state, and areas where tensions between Jubaland state and the Federal Government persist, complicating administrative processes to guarantee access to humanitarian organisations (OCHA 13/04/2025).

READ MORE ABOUT SOMALIA

SOUTH SUDAN

Score: 4

South Sudan experiences high levels of humanitarian access constraints because of armed conflict and political instability. Bureaucratic barriers to humanitarian operations have sharply increased in the past years, with reported incidents rising by 60% from over 52 in 2023 to more than 84 in 2024 (OCHA 08/03/2024, 25/03/2024, 12/04/2025, 11/05/2024, 06/06/2024, 25/07/2024, 27/08/2024, 06/09/2024, 11/10/2024, 31/10/2024, 13/12/2024, and 10/01/2025). This increase is driven by a combination of new policies, such as the introduction of additional taxes on fuel, cargo tracking, and security escorts, as well as the stricter enforcement of existing regulations and growing decentralisation of authority.

In 2024, authorities imposed excessive fees, including USD 200 for INGOs and USD 100 for national NGOs for operational licenses in Central Equatoria state, alongside arbitrary renewal charges. No publicly available legal documents or ministerial orders explicitly refer to these exact charges. These fees are often based on state-level administrative circulars or informal directives rather than published laws (OCHA 06/06/2024). Similar financial burdens emerged in Western Equatoria (USD 250 licensing fees) and Upper Nile states (10% tax on terminated contracts), inflating operational costs and delaying aid delivery (OCHA 06/09/2024). Interference in staff recruitment further disrupted operations, particularly in Jonglei (Ayod, Fangak) and Upper Nile (Maban, Maiwut, Renk), where local authorities tried to dictate hiring processes (OCHA 31/10/2024). Movement restrictions, such as illegal checkpoints along the Warrap–Bentiu route and boat seizures in Malakal, compounded delays (OCHA 11/10/2024). In Unity state, bureaucratic meddling worsened a cholera outbreak in Bentiu by obstructing medical supply deliveries (OCHA 10/01/2025).

In 2025, the Government announced a 20-fold increase in work permit fees, from USD 250 to USD 5,000, for INGO staff. While the policy targets only international personnel, the operational impact is significant, straining budgets and potentially limiting the number of international experts deployed. In parallel, local officials in Renk county have started demanding a USD 1,500 registration fee from aid organisations, a practice not formally codified – further burdening organisations and delaying humanitarian response operations (OCHA 20/03/2025). Extortion has become rampant, with UN contractors detained and forced to pay illegal fees in Unity and Upper Nile states (OCHA 04/03/2025). In Fangak county, armed groups are imposing unauthorised clearance fees on aid boats, while authorities in Leer county have detained eight humanitarian

vessels over disputed taxes (OCHA 22/05/2025). New administrative hurdles have emerged, including demands for detailed staff lists (names, roles, gender, origin) in Greater Pibor and forced local hiring quotas in Renk county, further slowing response efforts (OCHA 23/04/2025 and 20/06/2025). Security forces in Aweil East county have blocked aid convoys, preventing access to Wedwel (OCHA 20/03/2025).

These systemic barriers, ranging from financial exploitation to recruitment interference, have prolonged suffering, leaving thousands without timely food, medical care, and protection services. As economic instability deepens, authorities at both national and subnational levels may continue to impose inflated fees or irregular taxation on humanitarian organisations. While some practices may appear opportunistic at the local level, recent developments suggest a broader institutional trend. In early 2024, new charges such as cargo tracking fees, customs duties, and fuel escort permits led to the suspension of UN food airdrops, disrupting the delivery of aid for over 60,000 people, with an additional 145,000 projected to be affected if the fees remained in place (Eye Radio 03/05/2024; UN 29/04/2024). Although international pressure eventually prompted the Government to issue a ministerial directive reaffirming tax exemptions for humanitarian responders, the fact that such measures were introduced and maintained for months points to the growing institutionalisation of financial impositions rather than punctual and localised barriers.

READ MORE ABOUT [SOUTH SUDAN](#)

SYRIA

Score: 4

Despite the fall of the Al Assad Government in December 2024, humanitarian access restrictions continue to be very high, though the nature of access challenges has shifted. The current context no longer includes active front lines, multiple humanitarian hubs operating in isolation from one another, or the pervasive security surveillance that hindered access under Al Assad's Government. INGOs report greater geographic flexibility and improved engagement with authorities, including the Ministries of Foreign Affairs and Expatriates, Social Affairs and Labour, and Displacement and Migration (KII 08/07/2025). That said, significant bureaucratic and administrative hurdles still shape the operational environment.

The transitional Government introduced a new registration process in April 2025 requiring all national and international organisations to reapply, regardless of prior presence in the country or history of operations (WCHR 12/05/2025). An umbrella system, imposed by the transitional Government, where a national stakeholder acts as a third party, hinders the operational independence of INGOs and leads to delays in needs assessments and programming. Until May 2025, INGOs had to first obtain a temporary licence from the Ministry of Foreign Affairs and then sign a memorandum of understanding with either the Syrian Arab Red Crescent or the Syrian Development Organization, both of which have continued to function under the transitional Government despite their institutional ties to the former regime (HRW 12/05/2025; WCHR 12/05/2025).

The EU and US sanctions imposed on Syria since 2011 continued to affect the import of goods and the operational environment for humanitarian responders until February 2025, when sanctions started to gradually be lifted (Council of the EU 24/02/2025). This is expected to ease longstanding financial and logistical constraints on humanitarian operations in Syria. Easing these restrictions is likely to improve banking and access to essential humanitarian aid and support the restoration of key infrastructure (OCHA 14/05/2025). This relaxation has also notably improved access to previously restricted sectors, including transport, energy, and reconstruction materials (Reuters 24/02/2025).

READ MORE ABOUT SYRIA

HUMANITARIAN ACCESS
HIGH CONSTRAINTS

CAMEROON
Score: 3

Humanitarian access in Cameroon remains constrained mainly owing to insecurity and growing BAIs, particularly in Far North, Northwest, and Southwest regions. Armed group activity, insecurity along key routes, and conflict-related disruptions are the primary drivers of restricted movement for humanitarian responders and crisis-affected populations. BAIs are a secondary but persistent constraint, primarily affecting documentation access, coordination, and operational approvals. Most BAIs are imposed by state authorities, though some are linked to armed groups and local governance dynamics.

Among displaced populations, the lack of civil documentation remains a major constraint to accessing services. IDPs, returnees, and refugees often lack birth certificates, identity cards, or proofs of residence, which are required to access health, education, and legal services (OCHA 31/01/2025; Protection Cluster 17/04/2025). Barriers to birth registration include lack of access to civil registry offices, insecurity, and unaffordable administrative fees. For women and girls, documentation gaps increase the risk of early marriage, gender-based violence, and exclusion from assistance (OCHA 15/04/2024; ARDHU 09/06/2025). Despite efforts to expand mobile registration campaigns, documentation gaps remain widespread, particularly in remote and conflict-affected areas. There is no recent estimate of how many people are currently excluded from services because of these barriers. The absence of updated data limits planning and accountability and itself reflects a barrier to effective response. Older assessments highlight persistent under-registration in displacement-affected areas, but figures are outdated or fragmented.

Humanitarian responders also face operational delays because of fragmented coordination between humanitarian organisations, local authorities, and national ministries, as well as by local administrative requirements (OCHA 15/04/2024). In 2025, Far North saw reports of prolonged approval procedures for needs assessments and IDP relocation (ARDHU 09/06/2025). In the past, delays of similar nature have contributed to disruptions in assistance and longer exposure to protection risks for displaced populations. In Northwest and Southwest regions, regular lockdowns imposed by separatist NSAGs and the imposition of unofficial taxes by armed parties continue to restrict the movement of aid workers and crisis-affected populations (OCHA 03/07/2025). Between January and March 2025, a ban on humanitarian vehicle circulation along the Bamenda–Bali–Mamfe route also disrupted operations (GCR2P 14/03/2025). At the

same time, the importation and clearance of humanitarian goods through Douala port is costly and hampered by informal payments and fragmented procedures (HELP Logistics 11/08/2024). Besides representing a logistical access constraint, the bans, fragmented procedures, and uncontrolled costs reflect broader governance issues, including systemic corruption in customs and port authorities, undermining the efficiency of humanitarian delivery.

Although no widespread programmatic interference by national authorities was reported in 2025, armed groups in Northwest and Southwest have repeatedly interfered in humanitarian activities in recent years. This interference has included imposing conditions on how and when aid can be delivered, limiting the types of assistance allowed, and influencing the selection of recipients. In some cases, demands made by these groups or threats against staff have disrupted or suspended distributions (USCRI 28/03/2025; OCHA 23/03/2025 and 03/07/2025). While the frequency of such interference appears consistent with previous years, the tactics have become more targeted, particularly during politically sensitive periods or localised surges in violence (OCHA 31/01/2025; USCRI 28/03/2025). These constraints underscore the layered and decentralised nature of access impediments in Cameroon, where overlapping authorities and conflict dynamics complicate aid delivery.

READ MORE ABOUT CAMEROON

CHAD

Score: 3

While insecurity and logistical challenges primarily constrain humanitarian access in Chad, BAIs continue to affect both displaced populations and humanitarian responders. The most documented concern in 2025 relates to the lack of civil documentation among Sudanese refugees in Ouaddai, Sila, and Wadi Fira provinces. Until March 2025, nearly 80% of newly arrived Sudanese refugees lacked civil documentation upon arrival. Many arrived without identity documents or lost them during displacement, as obtaining new papers remains difficult owing to limited mobile registration services, overstretched administrative personnel, and unclear procedures for documentation issuance. While humanitarian and government responders have scaled up mobile registration since mid-2023, coverage remains insufficient given the scale of arrivals, particularly in informal or spontaneous settlements. Responsibility for issuing documentation rests primarily with Chadian civil registry authorities, although UNHCR and other stakeholders support the process. Coordination gaps between responders contribute to inconsistent guidance on eligibility and procedures (UNHCR 30/05/2025). This significantly hampers access to basic services: health and education providers often require some form of identification for enrolment, while legal assistance and livelihood programmes may exclude individuals without recognised status (NRC 17/02/2025; UNHCR 30/05/2025). Although especially acute among recent refugee arrivals, similar barriers have been reported in previous years for returnees, IDPs, and host communities across southern and eastern Chad (OCHA 23/03/2023).

For humanitarian organisations, slow or inconsistent administrative approvals – especially for movement authorisations and activity implementation in eastern regions – continue to cause delays. These are often compounded by local-level interferences, including overlapping demands from local authorities, unofficial payments requested at checkpoints, and divergent requirements between national and provincial offices (UNICEF 05/06/2025; OCHA 01/07/2025). This decentralised obstruction increases the probability that affected populations – particularly those in remote or contested areas – miss timely assistance or are exposed to exploitative practices, such as transactional access or discriminatory gatekeeping by local responders. While not always the most visible constraint, these BAIs disrupt operations, increase response costs, and elevate protection risks for crisis-affected people – trends consistent with previous years (OCHA 23/03/2023; NRC 17/02/2025; UNHCR 30/05/2025).

READ MORE ABOUT CHAD

COLOMBIA

Score: 3

Humanitarian access constraints remain high in Colombia because of insecurity, movement restrictions, and violence against aid workers. The country recorded around 208 access-related incidents in 2024, including 58 movement restrictions for humanitarian organisations, a decrease from the 240 events in 2023. Humanitarian organisations face bureaucratic challenges from the Colombian Government, such as long or unclear registration processes, visa delays, and complicated customs procedures, which hinder their ability to effectively provide aid (OCHA 16/04/2025; OCHA 05/06/2025; Reuters 24/02/2025).

The operational control exercised by NSAGs frequently constrains humanitarian access in Colombia. Key impediments include the establishment of illegal checkpoints and the imposition of unofficial taxes for entry into NSAG-controlled territories. These conditions require humanitarian organisations to either engage in complex coordination with NSAGs to facilitate entry or, alternatively, seek protection and guaranteed passage from armed forces, which may hinder the perception of neutrality from the communities. Both approaches can limit the independence and flexibility of humanitarian movements, which can affect the timely delivery of assistance (OCHA 16/04/2025, 05/06/2025, and 04/12/2024; Reuters 24/02/2025).

READ MORE ABOUT COLOMBIA

EGYPT

Score: 3

Humanitarian access in Egypt has deteriorated from low to moderate with the new asylum law, signed in December 2024, that brings increased movement restrictions and protection risks for refugees through bureaucratic and legal barriers that restrict humanitarian access (UNHCR 16/12/2024). Before this, Egypt had no national asylum law. Instead, a 1954 agreement that delegated all refugee status determination and assistance to UNHCR governed refugee protection under a memorandum of understanding with the Government (Amnesty International 03/12/2024). The new law allows authorities to exclude or revoke refugee status without due process. It lacks appeal mechanisms and was drafted without consultation with UNHCR or NGOs. The law criminalises irregular entry and assistance to asylum seekers, raising the risk of arbitrary detention and deportation. These provisions risk shrinking the operational space for humanitarian organisations and obstructing the delivery of essential services to refugee populations, particularly Sudanese (Amnesty International 03/12/2024; RI 21/02/2025). The new asylum law is likely to worsen access to housing, education, healthcare, and protection, besides exposing refugees to discrimination and forced return (RI 21/02/2025). In 2024, over 18,000 Sudanese refugees were deported to Sudan. Between January and March 2025 alone, 21,000 were deported, reflecting the Government's stance on asylum and undocumented migration (Amnesty International 03/12/2024; Reuters 11/06/2025). Currently, UNHCR, in coordination with the Ministry of Foreign Affairs, has initiated a five-year transition plan aiming to support the development of a national asylum system that aligns with international standards to provide more protection for refugees and asylum seekers (UNHCR 30/06/2025).

Besides facing deportations, Sudanese refugees and asylum seekers have continued to experience border and entry restrictions since June 2023, when Egypt started requiring an entry visa even for women, children, and older people. Strict visa requirements, long wait times that last up to a month, and limited consular capacity hinder access to asylum and leave people stranded at the border (HRW 13/07/2023; RI 21/02/2025).

READ MORE ABOUT EGYPT

HAITI

Score: 3

Humanitarian access remains highly restricted in Haiti mostly because of persistent armed violence and the territorial control of NSAGs, especially in the capital, Port-au-Prince. By May 2025, NSAGs controlled around 90% of the city, setting up checkpoints and closing main national roads. This posed significant challenges for humanitarian organisations operating in the country (Sky 20/05/2025; Freedom House accessed 07/07/2025; OCHA 19/02/2025 and 27/03/2024).

Humanitarian organisations also often encounter lengthy and inconsistent registration and permit renewal procedures with various ministries, which can take long periods of time or be arbitrary, as the administration's ability to function is greatly limited. These bureaucratic hurdles can delay the legal establishment or continuation of operations for essential aid organisations. Obtaining visas and work permits for international humanitarian personnel can be a lengthy process, with reported processing times ranging from several weeks to months. This delay can hinder the deployment of international staff (Humanitarian Outcomes 02/08/2023; Playroll accessed 15/07/2025).

Complex customs processes hinder the importation of essential humanitarian supplies. Dealing with multiple institutions and completing extensive procedures can result in lengthy delays in clearing emergency items, incurring storage costs and ultimately slowing the distribution of life-saving food, medicine, and shelter materials to affected communities (US Embassy in Haiti accessed 15/07/2025; Logistics Cluster 10/09/2024).

READ MORE ABOUT HAITI

NIGER

Score: 3

Humanitarian access continues to be highly constrained in Niger. While insecurity remains the primary operational constraint, BAIs are increasingly shaping humanitarian operations – particularly through political interference, opaque regulatory processes, and a chilling effect on information-sharing. Although these issues are rarely documented in detail – likely to avoid backlash from authorities – they have led some NGOs to self-censor or limit public reporting on access challenges out of fear of deregistration or expulsion. The absence of information should not be interpreted as the absence of restrictions.

In early 2025, the Government of Niger ordered the suspension of the operations of the International Committee of the Red Cross and expelled its expatriate staff without public explanation (ICRC 02/07/2025). This incident, while the most high-profile, is part of a broader clamp-down on civil society and aid responders. In January, the Minister of Interior publicly announced plans to implement "important measures to monitor and supervise NGOs and development organisations", accusing some of being associated with adversarial foreign parties (DW 02/07/2025). These developments point to rising political interference and signal the potential for further restrictions on both operational access and civil society space. This trend aligns with a broader regional context of strained diplomatic relations and internal efforts to consolidate political control following the 2023 coup.

At the administrative level, aid responders continue to report delays caused by inconsistent clearance procedures and the need for escorts or authorisations to operate in high-risk regions, such as Diffa, Maradi, Tahoua, and Tillabéri (OCHA 28/04/2025; IOM 29/05/2025). While formally security-driven, escort requirements may also function as a control mechanism, as their approval is often subject to opaque criteria and discretion from local authorities. These conditions increase response costs and limit humanitarian reach. The lack of publicly reported constraints on affected populations' access to assistance likely reflects a monitoring gap rather than the absence of BAIs. Issues such as civil documentation requirements or localised administrative conditions may be underreported given the sensitivity of the context and limitations in humanitarian oversight.

READ MORE ABOUT NIGER

PAPUA NEW GUINEA

Score: 3

Humanitarian access in Highlands region of Papua New Guinea remains highly constrained, mainly given the persistence of periodic escalation of violence across the region, especially in Enga province (UNCT PNG 03/12/2024).

NGO registration involves a costly and bureaucratically complex, multi-stage process. Organisations must navigate overlapping national and provincial systems, often facing delays owing to poor governance and lack of coordination. Frequent demands for unofficial payments, unclear approval procedures, and shifting requirements further hinder timely registration. These administrative burdens significantly delay humanitarian operations and reduce the capacity to respond swiftly to urgent needs (PNG Boss 27/08/2024; PNG Canberra accessed 19/06/2025).

Importation and customs processes remain cumbersome despite reform attempts by the Government. Regulations require humanitarian shipments to include bills of lading (proof of shipment document), invoices, packing lists, fumigation certificates, deeds of donation, and organisation permits – often with protracted preshipment approvals by the Internal Revenue Commission. While an electronic single window blueprint aims to streamline clearance, full implementation is pending, leaving institutions reliant on outdated, slow systems (PNG Canberra accessed 19/06/2025; Global Hand accessed 19/06/2025; UNCTAD 31/05/2024).

In Highlands, crisis-affected populations face major hurdles in accessing basic services owing to tribal conflicts and the Government's limited capacity to manage them, often hampering the movement of both the affected population and humanitarians. Authorities often impose curfews and military operations, to restore order, particularly in conflict-affected areas. While aimed at improving security, these actions further restrict the movement of displaced people and limit humanitarian access. Combined with remoteness and critical infrastructure damage from climate hazards, these restrictions severely hinder the delivery of essential services such as healthcare, food, and protection for the affected population (UNCT PNG 31/01/2025; ACLED 25/04/2025).

READ MORE ABOUT PAPUA NEW GUINEA

RUSSIA

Score: 3

Legal barriers and overbearing administrative requirements have long constrained NGOs in an increasingly controlled political environment in the Russian Federation (Freedom House 16/07/2009; ICNL accessed 27/05/2025). The Russian foreign agent law introduced in 2012 has limited independent information and NGO activities, both national and international, especially since the onset of the Russian full-scale invasion of Ukraine in 2022 (HRW 12/11/2021 and 19/09/2024). These operational and informational constraints have reinforced one another, resulting in an invisible displacement crisis that is being systematically obscured by authorities, who also deny the deportation of unaccompanied children from Ukraine (People in Need 18/06/2025). Displacement continues to be driven by international conflict, with people lacking needed access to independent assistance. Those displaced from Ukraine are additionally coerced to accept Russian passports to access essential services, to which they are legally entitled (FMR 08/2023; Burkhardt 2023; Syg.ma 05/04/2023). These conditions will continue to prevent a principled humanitarian response based on impartiality, neutrality, and independence. Although present in Russia, UNHCR is not authorised to respond directly to individuals displaced from Ukraine. Russian citizens who volunteer to help are at risk of arrest on dubious charges and assault in custody, with one such already incident resulting in death (The Guardian 13/04/2024; The Moscow Times 20/06/2025). The lack of an independent protection framework and return mechanism coordinated through responders obstructs access to an information-based needs-driven response and the safe return of those forcefully displaced into Russia, including unaccompanied children (Ukrainska Pravda 16/12/2024).

READ MORE ABOUT RUSSIA

THAILAND

Score: 3

Humanitarian access in Thailand remains relatively stable but is shaped by longstanding structural and policy-related constraints, particularly affecting Myanmar refugees. Over 100,000 refugees live in nine official camps along the Thai–Myanmar border, with an additional 20,000 residing in rural areas of Thailand outside the camps (TBC 09/06/2025; HRW 2025 d; UNHCR accessed 19/06/2025). By 2025, basic services in these camps remained limited and strained, with refugees in rural areas facing even further access and protection concerns (APHR 21/07/2025; TBC 22/05/2024). While national and international humanitarian organisations are permitted to operate within these camps, refugees face strict movement restrictions and are not allowed to leave, enforced through camp administrative regulations (Freedom House 2022; HRW 14/07/2025). They are excluded from national health and education systems, relying entirely on humanitarian services to meet their basic needs (HRW 2025 d; UNHCR accessed 19/06/2025; UNHCR 28/05/2025). Access constraints are more pronounced for newly arrived refugees who fled Myanmar after the 2021 military coup. Many lack identity documents, such as passports that they lost during displacement, and are considered irregular migrants under Thai law. Many of these individuals live in informal settlements in remote rural areas along the border, where humanitarian presence is limited and access to services remains constrained (TBC 22/05/2024).

The Thai Government has also restricted UNHCR from conducting refugee status determination for several groups, including Rohingya and others from Myanmar, further limiting access to protection and leaving many at risk of harassment, arrest, detention, deportation, and exploitation (HRW 14/07/2025 and 2025; Fortify Rights 18/01/2024).

Operational constraints are increasing. As well as the 2022 Nonprofit Organisations (NPO) Bill, which imposes overly broad prohibitions on NPO activities, excessive controls over foreign funding, disproportionate fines and penalties, and burdensome reporting and disclosure requirements, the Ministry of Interior proposed a new draft Act on Associations and Foundations in October 2024. While it was presented as a response to isolated cases of fraud, it imposes sectorwide controls, including mandatory registration, criminal penalties, heavy reporting obligations, and broad state powers to interfere in NPO operations. This approach risks deterring legitimate humanitarian and civil society activities and is inconsistent with international law, posing long-term risks to the humanitarian space in the country (ICNL accessed 18/06/2025; ICNL 03/2022).

READ MORE ABOUT THAILAND

TUNISIA

Score: 3

BAIs have continued to restrict humanitarian access in Tunisia, primarily affecting migrants, refugees, and asylum seekers. The absence of a national asylum law and temporary protection system, besides Tunisia's nonrecognition of UNHCR documentation, hinders the legal recognition of refugees and asylum seekers, limiting their access to services (IHD accessed 05/07/2025; Amnesty International 04/10/2024). In April 2024, the Tunisian Government formally requested the suspension of UNHCR's asylum registration activities nationwide. Until May 2025, an unknown number of new asylum seekers remained unable to register or access either UNHCR or national healthcare and financial aid, while UNHCR was only renewing documents for previously registered individuals (OHCHR 05/02/2025; IM 31/10/2024). This registration gap limits both population monitoring and the provision of essential services.

Since May 2024, Tunisian authorities have arrested at least eight NGO workers and two former local officials for providing assistance to migrants and refugees, with charges including facilitating irregular stays and sheltering illegal entrants. This further constrains humanitarian operations and hinders the access of people in need to protection and asylum registration (Amnesty International 07/05/2025). They face charges under Law 40 of 1975, related to passports and travel documents, and Law 68-7 of 1968, criminalising facilitating irregular entry, movement, or stay, and sheltering individuals entering or leaving the territory illegally (Amnesty International accessed 22/07/2025).

Since July 2023, migrants, especially from sub-Saharan Africa, have faced further restrictions owing to official Government-imposed bans on working or receiving foreign currency transfers. Such restrictions are implemented and actively enforced through presidential and administrative directives targeting undocumented migrants. These policies have pushed many to rely on informal assistance, limiting their ability to meet basic needs (IM 02/05/2025; Asharq Al-Awsat 02/07/2025).

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VENEZUELA →

Score: 3

Humanitarian access in Venezuela remains highly constrained. The legal landscape of Venezuela, specifically the recently implemented Law for the Control, Regularization, Operations, and Financing of Non-governmental and Related Organizations, significantly restricts humanitarian efforts for both local and international NGOs. This law, along with other proposed legislation, such as the International Cooperation Law, imposes strict and often arbitrary registration requirements, mandates the disclosure of sensitive information on funding sources and those receiving aid and gives authorities broad discretion to refuse authorisation or even dissolve organisations (DL accessed 04/07/2025; Amnesty International 16/08/2024).

Often called the Anti-NGO Law (enacted in August 2024 and coming into effect in November 2024), it creates a climate of legal insecurity and fear, as any NGO could be forced to cease operations, increasing the risk of criminalisation for humanitarian workers.

These measures also restrict international funding flows by criminalising financing from 'politically motivated' parties, a term with a vague definition, and force organisations to either scale back essential programmes or shut down entirely if deemed non-compliant. This significantly reduces already fragile access to life-saving aid for Indigenous, rural, and low-income communities in Venezuela (DL accessed 04/07/2025; Amnesty International 16/08/2024).

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