

## Common Civil Society position paper on the outline of the 2028-2034 Multiannual Financial Framework

This document provides civil society’s position and proposals on the outline for the 2028-2034 Multiannual Financial Framework’s (MFF) negotiations. This document also draws on the recommendations included in the report “[The Future of Europe is Ours: A View from Civil Society Recommendations from civil society organisations for the Conference on the Future of Europe](#)” (CSCoFoE) and in the report “[Civil Society State of the Union 2023](#)” (CSSOTEU), as well as civil society’s analysis of the current programmes and of the needs for the next seven-year period. The structure of the document follows the headings of the current MFF.

Whatever the proposed division in different headings of the MFF 2028-2034, we underline that the mentioned programmes should remain standalone within such headings.

This document has been prepared by the Working Group on Funding of Civil Society Europe, which includes a large number of civil society organisations from a wide variety of policy sectors. We would like to thank in particular AGE Platform, ALDA - European Association for Local Democracy, Caritas Europa, Centre for European Volunteering, CONCORD Europe, Culture Action Europe, European Association of Service Providers for Persons with Disabilities (EASPD), European Civic Forum, European Patients’ Forum<sup>1</sup>, European Students’ Union, European Youth Forum, ILGA Europe, International Planned Parenthood Federation European Network, Lifelong Learning Platform, Philea, Social Platform, and the Young European Federalists (JEF Europe) for their contributions.

March 2025

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## *1. General considerations on the Multiannual Financial Framework*

Civil Society calls for an open and rights-based approach in the development of the next Multiannual Financial Framework (MFF) to ensure full support for the fundamental pillars of the EU. These include contributing to sustainable development, social and economic cohesion, promoting culture and education, investing in research and innovation, the protection of patients and consumers, international cooperation and humanitarian aid, while addressing new challenges and priorities such as climate change, cyber security, rule of law, fundamental rights and democracy. This is even more critical given the current geopolitical situation, increased threats on the EU and tensions in transatlantic relations with loss of support from the US in critical areas from defence to international cooperation, human rights and democracy.

A key principle that must underpin the MFF is the concept of human, social, ecological and cultural security which requires strong democracies and inclusive access to fundamental rights. Security should not be narrowly defined by militarisation or the fight against external threats, leading to the potential restriction of civil liberties and scapegoating already excluded groups. Instead, it should focus on safeguarding people's health and well-being and ensuring both individual and collective freedoms and fundamental rights. Strengthening EU Values based European civil society in all its diversity is crucial for addressing future challenges. This approach highlights the need to ensure that funding deployed for more security and defense in a more narrow approach does not come at the expense of policies and funding fostering a just, democratic and inclusive society, such as those on social cohesion and values. In external and internal policies, it is critical to reinforce, reshape and connect EU defence with peace building and reducing polarisation, conflict prevention, crisis management, and civil society preparedness where civil society plays a key role in rebuilding, as well as development policies.

Addressing the increasing climate, environment and social inequalities should be at the core of any security and preparedness policies. To effectively tackle these inequalities, a thorough mainstreaming of measures that address them must be in place: at least 50% of the future MFF should be dedicated to sustainability. climate and environment-related objectives, with separate funding targets for biodiversity and zero pollution. Furthermore, a reformed and strengthened Do No Significant Harm (DNSH) principle should be applied across the MFF and all EU funding instruments, to exclude any direct or indirect EU funding for fossil fuels, hazardous chemicals, pesticides and other environmentally harmful subsidies. Eligibility criteria for EU funding under the MFF should exclude infrastructure investments not aligned with the objectives of the Paris Agreement and undermining the EU's efforts to reach a net-zero economy by 2050.

The creation of national reform and investment plans under the new MFF should be linked to targeted reforms that advance EU member states in their transition to climate neutrality and support their nature protection and restoration, adaptation and just transition efforts. They would need to be complementary and consistent with existing planning procedures such as the National Energy and Climate Plans, Social Climate Plans, the Prioritised Action Framework and the future National Restoration Plans. They would need to be drafted in timely and meaningful consultation with local and regional authorities, civil society and other stakeholders to ensure the achievement of key goals and effective implementation.

The Commission has made efforts to simplify the use of EU funds in the MFF 2021-2027, and has committed to include further simplifications in the next MFF. One of the main barriers for many organisations to access EU funds remains the complexity of these funds and the lack of human resources to deal with the often disproportionately heavy application and reporting requirements. Even though the simplifications in the current regulations, such as simplified cost options, are an important step that goes some way to improving accessibility to the funds, more efforts are needed to ensure that simplifications also benefit the beneficiaries as much as the fund administrators. This is particularly affecting small and medium organizations. At the moment, there is too much uncertainty regarding the use of simplification measures, which means that the grant beneficiaries are still keeping copious records of all receipts and processes that go beyond the requirements of ME accounting regulations at the specific request of some funding agencies and at the organisations' own volition to avoid unwelcome surprises during reporting and audits. Therefore, particular attention should be paid to creating an enabling environment which reaches all stakeholders. We welcome the idea of making the MFF simpler for beneficiaries. This simplification, if well designed and in consultation with beneficiaries, will also contribute to reinforcing transparency and accountability in spending of EU funds. To achieve this, it should be complemented by awareness and support mechanisms including on EU environmental, social and fundamental rights standards.

For what regards the structure of the MFF, we believe that the different missions of the EU programmes should be maintained, and should not be reduced to single aspects, such as competitiveness. While some synergies can and should be built across programmes (or areas of programmes) with overlapping and closely related objectives we believe that caution should be taken in merging the current programmes if they have clearly distinguishable objectives and/or are not thematically related even when focused on the same or similar target groups. Equally, the splitting up of programmes with an internal thematic coherence should be avoided. We believe that it is important to safeguard the capacity of the existing programmes to address a wider range of EU objectives in a more comprehensive and coherent way than would be the case under a new structure of a very few big overarching themes<sup>2</sup>.

The EU should ensure that the MFF promotes the Union values, as defined by Article 2 of the Treaty on European Union (TEU) and by the EU Charter of Fundamental Rights. For this reason, civil society organizations call for a stronger Rule of Law conditionality mechanism, with stronger links with the implementation of the country-specific recommendations of the annual Rule of Law report, and conditionality based on respect for the Charter. Furthermore, civil society calls for a renewed commitment to gender budgeting as an overall principle for the MFF, continuing the commitment taken for the current cycle.

Moreover as a follow up of European Parliament resolutions and Council conclusions on the role of civic space, and its own report on the implementation of the Charter on Fundamental Rights, the European Commission has included a Multi annual strategy to protect, empower and support civil society in its work 2025 programme. The MFF should foresee adequate resources to ensure consistency with the strategy and the aim of supporting civil society.

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<sup>2</sup> With regard to the Erasmus+ Programme and European Solidarity Corps Programmes, we believe they should remain separate as Erasmus+ covers the youth, education and sports sectors; whereas European Solidarity Corps has an overarching volunteering focus.

Furthermore, the EU and its Member States have committed to upholding human, including social rights through different policy frameworks such as the European Pillar of Social Rights, the EU Fundamental Rights Charter and by signing international human rights conventions (such as the United Nations Convention on the Rights of Persons with Disabilities and the Revised European Social Charter). These frameworks also set standards for the accessibility, affordability, availability and quality of care and support. The EU has been playing a leading role to ensure Member States move towards the implementation of these frameworks, so as to ensure people in the EU have access to their rights. It has been doing so by using EU funds for social reforms, and by setting conditions for the use of the EU's shared management funds including ESF+ (through ex-ante conditionalities in the MFF 2014-2020 and enabling conditions in the MFF 2021-2027). The EU should continue its influence to uphold human rights, including social rights, social protection, adequate housing, and ensure universal access to quality care provision through renewed conditions which apply to all resilience and cohesion funds, by including also new references when necessary, such as the [EU Guidance on Independent Living and Inclusion in the Community for Persons with Disabilities](#). Human rights are universal, and therefore the same conditions for the use of the EU funds should apply to all Member States.

In addition, as part of ensuring preparedness of the EU to enlargement, we stress the importance of allowing civil society organisations from the accession countries to participate in the different EU programmes as programme countries when suitable agreements with sufficient checks and balances with the relevant Member States are established.

## *2. On the financing of the MFF with EU own resources*

The green transition and the digital transformation of the EU will require massive investments in the upcoming years: according to the [Draghi report](#), an additional 750-800 billion euros per year will be needed. While this can partially be achieved by direct Member State spending and some reforms of the Single Market, the MFF will certainly play a major role, especially for pan-European policies and investments. Such additional expenditure capacity indicates the need for a bigger MFF which cannot be solely compensated by an increase of the Member States' contributions and therefore needs new "own resources".

We support the swift adoption of the [new own resources proposed by the Commission in 2023](#). However, such new own resources will not be enough to fill the investment gap - therefore additional new own resources are needed. Such own resources should be based on the criteria of: 'polluter pays' principle; fair and progressive taxation; partial earmarking to the EU external action projects; transparency, as well as respect for fundamental rights.

Furthermore, building on the experience of the Recovery and Resilience Facility, the EU should explore the possibility to issue common debt to finance transnational investments in common European public goods: In order to reach the level of investment needed for a just green transition, without cutting spending lines under the MFF that target major social and development objectives, such 'Next Generation EU 2.0' should amount to [€1 trillion](#). At the

same time, there should be an improved guidance and support to Member States so as to improve absorption rates of such transnational investments<sup>3</sup>, especially to implementing authorities at national, regional and local level especially in less developed regions, regions in transition from fossil-intensive industries, and Member States that have limited national fiscal capacity.

### *3. On the operating grants*

Many EU programmes foresee operating grants. Operating grants are defined by the Regulation (EU, Euratom) 2024/2509 as grants awarded to fund “the functioning of a body which has an objective forming part of, and supporting, a Union policy”.

Since several decades, citizens and civil society organisations have organised themselves into European networks, federations and structures to make their voice be heard at the EU level. Recognising their role in bringing the voice of EU citizens in the decision-making process, EU institutions have been supporting European CSOs via operating grants for decades. EU Core funding for civil society organisations that goes beyond “project (Action) funding” is critical to provide the EU institutions with a pluralistic representation of the different interests and views into the policy-making process. Moreover, citizens’ participation through the organisations they create and engage with, often as volunteers, is crucial to ensure that all interests have the possibility to be heard, and that public interest is not overtaken by vested interests and overshadowed by the financial strength of corporate lobbying and private interest representation groups. While they do not fully rebalance the investments in lobbying activities of the corporate interests groups, operating grants strengthen the structural capacity of civil society organisations to efficiently shape and inform EU policies and provide structured feedback to the EU institutions on the implementation of policies and legislation, breach of fundamental rights or the fight against corruption. Through their feedback, civil society organisations ensure that EU policies and proposals are based on lived experience of those affected by such policies and gathered from the grassroots, resulting in better, more effective and more implementable policies with a greater sense of ownership amongst the population. This is particularly relevant for the European Commission, which holds the right of initiative and which is bound to consult all relevant stakeholders in preparation and evaluation of a policy initiative. Access to core funding for civil society allows them to perform such functions, which cannot be funded by action/ project grants, since they often do not cover running costs in a plannable, sustainable and comprehensive way, nor the policy dialogue activities that underpin the agreed scope of Action grants but cannot form an integral part.

Therefore, civil society strongly supports the existence of the operating grants in the different programmes under the MFF<sup>4</sup>. Furthermore, civil society underlines that Articles 11 and 12 of

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<sup>3</sup> See the European Court of Auditors’ [Special report 13/2024: Absorption of funds from the Recovery and Resilience Facility – Progressing with delays and risks remain regarding the completion of measures and therefore the achievement of RRF objectives](#).

<sup>4</sup> However, the cultural sector prioritises project-based funding in the Creative Europe programme to safeguard artistic freedom, allow full access to indirect costs in other EU grants, and maintain an uncapped grant size.

the EU Charter of Fundamental Rights, on freedom of expression, peaceful assembly and association, shall be respected when evaluating the activities proposed in the operating grants application, as long as these activities are compliant with EU values as enshrined in Article 2 TEU: mandating or banning certain policies outcomes or activities from the operating grants beyond the above mentioned criterion would breach the principle of the political neutrality in the awarding criteria. The MFF must continue to allocate resources to enable organised civil society participation in dialogue and advocacy on all European policy-making thematic priorities.

Furthermore, civil society supports the [European Parliament's call](#) to “propose a comprehensive set of measures and recommendations to ensure long-term predictable, adequate and enabling financing for CSOs, including the funding of their operational activities related to advocacy and monitoring” and to “avoid red-tape measures”, including in candidate countries to EU membership. Civil society supports also the [Council's conclusions](#) on the application of the EU Charter of Fundamental Rights; The role of the civic space in protecting and promoting fundamental rights in the EU – Council conclusions (10 March 2023) which invite the Commission to support CSOs and human rights defenders of all sizes, levels and capacities to have the possibility to benefit from EU funds, inter alia by simplifying open calls, stepping up support to potential applicants and continuing innovative approaches such as financial support to third parties (CSOs) by intermediaries as well as core funding (operating grants) for organisations to enable civil society organisations to contribute at relevant steps of decision-making and to be involved in a meaningful way across policy and legislative areas.

This support needs to be reinforced in the next MFF given the increased challenges to a thriving civil society and its ability to respond to crises and provide societal solutions.

For what regards the outlook of the programmes, involving civil society from the beginning in the design of funding policies and programmes is essential, including in the definition of thematic priorities and accessibility criteria. A structured mechanism should be put in place to ensure adequate and regular dialogue and information flow between civil society and public donors on the implementation of funding programmes. The regulation of the Citizens, Equality, Rights and Values Programme includes the establishment of the Civil Dialogue Group which involves civil society organisations in a structured way to contribute to the shaping of its Annual Work Programme (AWP). The same provision should be extended to all other EU Programmes to ensure that the process to discuss and approve the AWP is enriched with the input of the organisations that are the closest to the sectors covered. Furthermore, dedicated funding to support the timely and meaningful engagement of local communities, organisations and the public in the implementation of EU funding programmes, including at Member State level, should be increased. This includes institutional frameworks that ensure greater transparency, accountability, and participatory approaches of governance, such as partnership principle, public consultations and strategic dialogues.

## *Heading 1: Single Market, Innovation and Digital*

### ***Digital Europe***

Ensuring strong digital accessibility standards across public services, employment, and education is essential for an inclusive digital transition of all. Under the Digital Europe programme, funding should support assistive technologies and the development of accessibility solutions and technologies that enhance the autonomy of persons with disabilities, in full collaboration with impacted communities. Care must be taken to ensure that such programmes are not instrumentalising people with disabilities, nor for the deployment of assistive technologies in forced institutional settings. Furthermore funding should also support digital accessibility innovations, upskilling for social service providers, and interoperability of assistive technologies with mainstream digital tools, including in the field of volunteering encouraging diversity in participation.

### ***European Strategic Investments***

EU funding must include investments in quality green jobs that guarantee people's and planet's well-being, fostering a real just transition that leaves no one behind. To maximise the impact and benefits of EU funds, financial support to projects and companies needs to be conditional on [minimum requirements](#) such as the existence of transformation plans, the respect of labour and social standards, a thorough consideration of health impacts, and the adherence to sustainability and resilience criteria. In addition, we demand an improvement of mainstreaming approaches, as well as monitoring systems to demonstrate wider co-benefits of the investments.

Therefore, a prospective European Competitiveness Fund should strengthen and improve existing EU funds that are providing tailored support for the domestic manufacturing of strategic clean technologies, reducing overlaps and improving coordination between existing funds. A toolbox of financial instruments should be offered to companies, from the research and development to the production scale-up phases. Access for smaller and innovative firms that lack access to funding should be prioritised. Climate and environmental considerations should be mainstreamed in all operations under the Fund.

Access to free, equal and affordable internet is a fundamental right of every EU citizen: given the importance today of having access to the internet for a significant number of vital tasks, access to the internet, combined with a focus on improving digital health literacy to leave no one behind, should be guaranteed for everyone. In this respect, specific EU- and nationally funded programmes should have a focus on groups in vulnerable situations and people at risk of poverty or social exclusion to guarantee equitable and just access to the internet and emerging digital technologies, including through the removal of financial barriers.

Investments in the digitalisation of public services, including social services must also cater for hard-to-reach segments of the population, by: a) funding and collaborating with civil society organisations which currently support those who are excluded from the digital transition; b) expanding initiatives that support and guide citizens in the digital transition (such as France's 'conseillers numériques') adapting them if needed and learning from both their failures and successes. At the same time, it is important that the EU ensures the offline accessibility of essential services, as well.



Moreover, the EU needs to encourage innovation at the EU level to support the creation of EU platforms, applications and service providers, which are appealing to users, competitive, and conform to EU rules and standards. In particular, dedicated and needed funding opportunities for open-source technology, basic digital infrastructure support (e.g. to ensure strong cyber security and resilience) and educational platforms must be available.

The cross-sectoral collaboration between scientists, civil society, EU Member States, companies and media on issues concerning digitalisation needs to be improved and supported.

The philanthropic sector can play a stronger role to finance such investments. We strongly urge an acceleration in the development of a suitable and daring co-investment facility for philanthropy under InvestEU. This facility, in collaboration with the European Investment Bank (EIB), National Promotional Banks (NPBs), and other InvestEU implementing partners, would provide innovative products, tools, and funding vehicles. These offerings, based on a co-investing or blended finance approach, would be designed to encourage philanthropic organisations to invest their endowments in mission-related financial instruments while effectively minimising the associated risks.

### ***Research & Innovation***

We believe that the EU through its different programmes has to keep a strong investment in research and development and also level it up to the new challenges that we are facing.

European institutions and governments should make available more public funds for independent research, think tanks and civil society organisations aimed at protecting the climate and environment, vulnerable groups, consumer safety, labour conditions, human and social rights, public health and well-being, education and culture to create the desperately needed level playing field between different interests.

Social sciences research remains also critical for deepening our understanding of societal dynamics and developing effective responses to emerging needs. They aid with recognising the social dimensions of the challenges we face and encouraging close partnership between grassroots civil society and Europe's research community throughout the entire research cycle. In particular, we believe it is necessary to enhance social cohesion and social innovation; support a vibrant and resilient European democracy based on fundamental rights and the rule of law; promote mutual understanding and solidarity by increasing awareness of Europe's cultural heritage; developing innovative new education and learning experiences by investing in educational research (Education for the Future of Europe).

### ***Single Market***

The single market is at the heart of the European project. Societal challenges, including the climate, energy and market design, require the Single Market to be future proof and built for resilience. The MFF needs to secure adequate investment in the development of market mechanisms that are consistent with the EU's environmental and social goals and

commitments. EU funding either through direct or shared management should further support small and medium-sized and locally rooted organisations and social economy actors operating on just and sustainable business models, such as sharing decision-making power with all societal stakeholders, ensuring full public transparency, and following a public purpose rather than maximising private profit or undertaking 'green-washing'. These benefit, for instance, energy cooperatives, circular economy initiatives, urban and community-supported agriculture, sharing economy practices and neighbourhood facilities.

## *Heading 2: Cohesion and Values*

### *Citizens, Equality, Rights and Values Programme*

The Citizens, Equality, Rights and Values Programme (CERV) is a cornerstone of the European Union's commitment to democracy, human rights, and fundamental values, and in supporting and protecting civil society active in this field demonstrates the value the Union places on the role of diverse, critical voices in a democratic society.

Ahead of the last MFF the EU institutions collectively recognised that building and maintaining strong and vibrant democracies required expanded support and funding.

The creation of the Citizens, Equality, Rights and Values Programme (CERV) was therefore an important step to address this gap. It has played a pivotal role in an increasingly difficult environment where violations were already entrenched in several member states. CERV's combined approach to enhance civic engagement, uphold fundamental rights, and promote EU values are part of its success. CERV remains indispensable in addressing funding gaps at the national level, supporting grassroots organisations through regranting mechanisms and reinforcing democracy and civic space - and while some of the results will only be seen over the longer term there are already clear indications of how the programme has strengthened civil society across the Union, promoted more collaboration and exchange and resulted in improved laws and policies.

Given the challenges that democracy and fundamental rights face in the EU and globally, supporting work in this area should be a top priority by the European Commission and European Council for the next years – CERV should therefore be maintained, reinforced and its budget increased also to respond to the needs of candidate countries joining the programme.

There are certain key features of the current programme that should be maintained:

- direct management by the Commission to support civil society working in often challenging environments and who are in many cases targeted by their governments;
- the regranting mechanism to enable a variety of organisations to receive supporting including smaller grassroots organisations working at a community level;
- dedicated lines to strengthen the implementation of the Charter of Fundamental Rights and the ability of organisations to build their capacity to litigate, often the last remaining tool when backsliding is entrenched;

- the structure based on Union values of equality and rights including gender equality, citizen's engagement and participation should be maintained but with greater flexibility and interlinkages between the different strands;
- actions to support dialogue and participation to ensure a diversity of voices are heard. One avenue is through the framework partnership agreements which enable civil society, organised at the EU level, to collect and channel citizen's concerns towards EU institutions; and
- the combination of cross-border cooperation and funding local and national initiatives for transnational and local impact.

Areas that need to be reinforced or expanded include:

- while funding to support the development of litigation has been critical – funding for litigation itself is missing. A feasibility study commissioned by the European Commission in 2020 recommended a number of funding models - these should be [revisited to contribute to a fund for strategic litigation](#);
- individual human rights defenders (HRDs) and civil society organisations have found themselves increasingly under attack, yet there is no rapid response funding for HRDs within the EU - in particular as HRDs within the EU are not eligible to seek support from the EU Human Rights Defenders Mechanism (ProtectDefenders.eu) which supports HRDs from outside the EU. The need for improved protection within the EU has been [recognised by the Commission](#) and the [options mapped](#) by civil society. Additional funding should be allocated within CERV to support the development of a Protection Mechanism for civil society and HRDs within the EU;
- beyond reactive protection, a shift towards a preventive approach is essential to halt the erosion of civic space before it leads to long-term damage. Early intervention, when restrictive measures are first introduced, can prevent their chilling effect on civil society and mitigate self-censorship. To this end, civil society actors have strongly advocated for an EU Early Warning and Fast Reaction System that would proactively monitor, detect, and respond to threats as they emerge, ensuring that interventions happen before restrictions become deeply entrenched. The CERV could support such a mechanism similar to the 'EU System for an Enabling Environment' which aims to promote an enabling environment for civil society in 86 countries across the globe;
- there is a need to build flexibility into grants and calls for proposals to ensure that groups, who are particularly marginalised, targeted by their governments or under attack from non-state actors are able to access funds;
- steps should be taken to simplify the overall administrative burden which remains high despite a number of innovations during the current funding period. These should include clarity around re-granting, lower restrictions on co-funding, restrictions on engagement in different projects and rising costs due to inflation. Given the challenging funding environment for rights and values CERV should cover 90% of the grant - as is the case in other programmes;
- a shift to genuine multi-annual, flexible core funding by eliminating the burdensome yearly application and reporting cycle. The current FPA structure, modelled as project grants with rigid work packages and deliverables, is inefficient, costly, and incompatible with the need for adaptability in a rapidly changing policy landscape. A revised approach, developed in dialogue with civil society and informed by the *Active Citizens Fund* pilots, is needed to balance long-term planning with flexibility; and

- enhance civil dialogue to co-design funding policies, ensuring thematic priorities align with emerging needs while improving accessibility, reporting, and impact evaluation in collaboration with civil society.

In many ways work supported by CERV underpins all other programmes within the EU. Without a culture of rights and values and a diverse, vibrant civil society, EU funds in other areas will either be at risk, or individuals and organisations will simply not have access to information and the freedom to innovate in other fields. Thus, CERV is an investment for the whole of the Union and should be preserved and reinforced in the next MFF.

### ***Creative Europe***

Civil society supports the call to allocate [2% of the MFF](#) 2024–2034 to support EU cultural and creative sectors and industries, their competitiveness and intrinsic value. Each euro invested in common EU actions supporting or complementing existing funding for the creative and cultural sector could potentially generate up to [€11 of GDP](#) (according to the EPRS).

Creative Europe must remain a standalone programme with its distinct budget line as part of the Competitiveness Fund. Funding lines such as transnational cooperation projects, European networks, cultural and creative pan-European platforms, transnational mobility, and the European Capitals of Culture should be preserved in the next edition of Creative Europe's CULTURE Strand. The co-funding rate in the CULTURE Strand (currently 60–80%) should be increased to 100%.

In case the budget for Creative Europe is increased, the following new funding lines may be considered: 1) an acquisition programme for cultural organisations and institutions to support purchasing outputs from Creative Europe-funded projects; 2) an EU-wide Cultural Pass to grant access to cultural experiences, primarily for youth and people from marginalised backgrounds; 3) micro-grants for first-time applicants and young artists (a simple lump-sum/unit-cost model and short application forms).

Synergies across EU funding opportunities for culture in the next MFF should be strengthened by extending the Strategic Technologies for Europe Platform ([STEP](#)) and its STEP Seal to culture funding. This would facilitate cumulative funding and the combination of grants from multiple EU budget instruments, including Creative Europe.

Funding for cultural projects must respect the independence of organisations and uphold the right of beneficiaries to determine the most effective ways and formats to achieve their approved objectives, including supporting volunteers in the culture sector.

Given the frequent use of copyrighted content for AI training without consent, it is worth considering the establishment of a fund or financial contribution from AI model providers and deployers to remunerate European small and independent creators and cultural and creative sector representatives. to mitigate the economic 'displacement effects' of AI and compensate for the previous illegal use of cultural content.

We believe that the EU must invest in cultural heritage to strengthen the values-based common European narrative which can combat rising extremism and democratic backsliding, help restore people's confidence in the European project, and further help foster civic spaces for dialogue between citizens.

### ***Erasmus+***

Erasmus+ is amongst the most successful EU initiatives, but the mobilities' budgetary envelope is insufficient to fulfil the objectives of the programme and reach people effectively. As stressed by Mario Draghi in his report on the [Future of European Competitiveness](#) it reaches only 15% of young people - a true Erasmus for All, with capacity to include people of all ages, situations and backgrounds who wish to be involved requires a 5-time budgetary increase. In line with this, the [European Parliament own-initiative procedure on the implementation of the Erasmus+ programme 2021-2027](#) highlighted the need for a tripling just for maintaining the current scope of the programme.

As the European Union is preparing for enlargement, a higher Erasmus+ budget is required to welcome the involvement of new EU Member States and/or third countries associating to the programme. On top of this, a renewed political interest towards education and training as shown by the flagship Commission's initiative 'Union of Skills' demands that the EU practices what it preaches. Therefore, the next MFF should include an EU 'investment envelope' for education and training, supported and strengthened with synergies with other EU funding strands, such as the cohesion funds and the ESF+. The involvement of the educational stakeholders, at the European and national levels, must be applied for the design and implementation of the Annual Work Programme.

The impact of inflation as a result of the COVID-19 pandemic and the Russian war of aggression have put a significant strain on the programme, but insufficient measures have been put in place to counteract that. To address this we propose to: 1. create an inflation adaptation mechanism within the programme and 2. a Year-by-year adaptation of the budget for Erasmus+ according to rising living costs and indexations.

While changes are needed, we believe that the objectives and priorities of the programme are sufficiently broad to be able to target the relevant challenges in the field of youth and education. We therefore reject the association of the Erasmus+ with the Competitiveness Fund as mentioned in the EC Political Guidelines 2024-2029.

Erasmus+ Programme should be better geared to meeting the overarching policy challenges across the EU. To achieve this we suggest: 1. earmarking dedicated funding for upscaling previously successful projects, 2. earmarking dedicated funding for impact assessment and sustainability, 3. an additional budget to cover the specific needs of learners with disabilities, with migrant background or with a low socio-economic background, and support for organisations wishing to invest more in disadvantaged learners, 4. upscale the re-granting tools to ensure further participation of grass-root organizations, 5. review small-scale partnerships to allow more volunteer-led, youth-led and grassroots organisations that work with disadvantaged beneficiaries to benefit from the programme, 6. more equitable budgetary

allocation among centralised and decentralised level funding, and also among the different funding strands (KA1, KA2, KA3, etc), 7. increase the earmarked budget for underrepresented sectors in the programme such as early childhood education and care, adult learning and education and vocational education and training so as to empower non-formal and informal sectors of learning.

As called for in the previous sections, the beneficiaries and potential beneficiaries of the Erasmus+ programme must be part of an Advisory Committee related to the programme. In this context, beneficiaries should be part of the Erasmus+ Programming Committees as observers and reporters, while similar consultative mechanisms should be designed at national level for the work with National Agencies.

In addition, all learning sectors - including early childhood education and care, school education, higher education, vocational education and training (VET), work-based learning and professional education, adult learning and education, as well as learners and educators in formal, non-formal, and informal learning environments - should be supported. Intergenerational actions that promote and support intergenerational fairness and solidarity in line with EU priorities should be strengthened across the various strands.

The priority on participation in democratic life, common values and civic engagement has been inconsistently applied across the programme and needs to be better mainstreamed. Moreover the programme should develop synergies among formal, non-formal and informal learning to ensure a coherent approach on lifelong learning for people of all ages. The programme should also further promote and empower volunteering in educational and learning contexts in all its diversity.

We call for the inclusion of support, notably of civil society organisations, for the development of digital education strategies (especially with regard to digital competences beyond formal education). In addition the programme should contribute to the provision of easily accessible and free-of-charge public education about cybersecurity available to all European citizens, to help protect them from harm.

Current measures are not sufficiently tailored to ensure the involvement of vulnerable groups. In this context, and to increase capacity in this aspect, we suggest increasing public funding for individuals, as well as for learning providers under the different strands of the programme. To improve inclusiveness, the structure of the Erasmus Student exchange grants should be changed towards a formula that covers the real study and living costs of the host location thus removing the need for personal capacity to “top up” the grant.

We suggest the following actions to achieve the Inclusion and Disability priority: 1. a stronger outreach campaign informing beneficiaries what support can be accessed for including learners and educators with a disadvantaged background, but also for target groups to better understand the availability of support, 2. earmarked funding for beneficiaries from a disadvantaged background, 3. a database of good practice and guidelines for the inclusion of people with fewer opportunities and in particular with disabilities, 4. better training for National Agencies to prevent any negative bias linked to learners with fewer opportunities, 5. a better definition of the criteria for learners with fewer opportunities.

We also suggest establishing a “European Students at Risk” scheme to allow human rights defenders in third countries who are denied their right to education to receive a scholarship to study in the EU, paralleling similar schemes established for researchers under Horizon Europe as well as the EU Mobility Programme for Myanmar.

Several measures should be included to ensure the greening of Erasmus+ programme notably by increasing the grants for green travel. Sustainability and climate change education should be promoted through a lifelong learning approach which targets learners at all ages and in different learning environments, including at higher education and professional development level, and beyond. Adult-targeted programmes should not be restricted to developing technical green skills. Rather, they need to enable people to access lifelong learning opportunities to build competences allowing them to address the global challenges we are facing today, such as active citizenship, collective action, and critical and future thinking. It is imperative to work on these two dimensions in parallel to foster well-being and sustainability.

Implementations across National Agencies (different agencies, different understanding and implementation of the same budget rule) should be harmonised. Moreover there should be better monitoring of how National Agencies implement the programme and training and guidelines should be provided to limit inconsistencies as much as possible.

Administrative and technical barriers within the programmes are still present, particularly in its complex administrative procedures and reporting, ineffective ICT tools, convoluted functioning of the programmes or delays in receipt of grants. These barriers favour more professionalised and well-staffed organisations and impact the access to the programmes of youth-led, volunteer-led and, in general, grassroots organisations. To tackle this, we recommend:

- Lowering administrative requirements and grant application and procedures more tailored to the realities of the civil society, volunteer and youth sector;
- Reducing the overall administrative threshold of grants and ensuring the grant applications and grant monitoring is proportional to the grant size by using simpler procedures for lower budgets;
- Improving the ICT systems supporting the programme.

### ***Youth in Erasmus + and European Solidarity Corps (ESC)***

While the total number of youth chapter and ESC grants has risen in the current programming period, this increase has not benefited youth-related civil society organisations and youth organisations as much as other types of organisations. Following the data of ESC and Erasmus+ platforms, the percentage of youth organisations receiving KA1 and KA2 grants (E+) and solidarity orientated activities (ESC) has decreased since 2021. To tackle this, we recommend:

- Widening the scope of how grant budgets can be used to include costs related to increasing the accessibility for project participants, and ensuring grants’ flexibility to meet the needs of participants that require so;
- Establishing an ‘EU Status for Volunteers in Voluntary Service Programmes’ recognised across all countries participating in the ESC, to, among other things, strengthen the

mobility of young volunteers including fast-track visa procedures and maintaining of rights (for example to State benefits) prior, during and post experience as applicable.

The emphasis on inclusion within the Erasmus+ and ESC is welcome, whereas structural barriers are still identified and present in the programmes. Organisations led by young people with fewer opportunities face two layers of disadvantage when accessing the programmes: firstly, the financial structure of programmes may not fully meet the needs of their participants, and secondly, as volunteer-led organisations, it may also be harder for them to engage in the application process. To tackle this, we recommend:

- Clearly defining 'youth organisations' within the framework of the programmes and prioritising youth civil society - including youth organisations - in grant decisions for ESC and Erasmus+ youth chapter grants;
- Ensuring that experts assessing Erasmus+ youth and ESC grants have experience with and knowledge about the youth sector functionalities and needs and that they are regularly trained to ensure a sufficient understanding of sectoral needs.

Research shows that Erasmus+ and ESC enables youth organisations to support young people to participate in civil society, however this happens primarily through immediate projects to develop individual learning and support and promote solidarity and not as much through longer-term development of youth civil society. To tackle this, we recommend:

- Maintaining the earmarked youth budget within the programme ensuring it is allocated at minimum the 10.3% it currently receives;
- Establishing regranting schemes managed by international organisations, to ensure easier to Erasmus+ resources for youth organisations and local organisations as a whole across Europe;
- Implementing eligibility criteria for the operating grants in the field of youth at centralised level that ensure they are targeted exclusively to youth organisations and youth civil society;
- Establishing operating grants at a decentralised level managed by National Agencies.

## ***EU4Health***

The COVID-19 pandemic, emerging health threats including antimicrobial resistance and the health impacts of climate change, the increasing prevalence of mental health issues and chronic diseases, population ageing, and stark healthcare inequalities, are enough evidence for the EU of the need to provide adequate funding and resources for health.

This means ensuring a strong and stable EU health funding under the next Multiannual Financial Framework. The EU4Health Programme operating grants should be accessible to civil society organisations and sufficiently funded to achieve the programme's essential public health objectives, including with earmarked funding for programmes addressing the health of marginalised communities.

The effectiveness of the EU4Health Programme can be strengthened by increasing the predictability of the funds via longer (3 or 4 years) framework agreements, which allow CSOs



to plan their activities with a medium-term perspective, as well as by providing more predictable timelines and longer application periods for the different calls under the programme, in order to give applicants the time needed to create multi-country consortia and to develop high quality proposals in an extremely competitive environment and to plan the use of their financial resources according to the fixed timelines of the funding programmes.

At the same time, EU4Health should take into account the difficulties of the funding environment for civil society organisations in the health sector, which often rely on private donors due to the lack of predictable and sustainable public funding, including at the national level. Therefore, the currently very limited amount of funding available for operating grants and coverage limit of 60% of eligible costs should be reviewed, as it does not provide sufficient financial certainty to NGOs and still forces them to dedicate significant resources to fundraising. This impacts their ability to deliver on core priorities. It also does not reflect the challenges of the post-Covid economic environment, where funding opportunities in both public and private sectors are constrained.

Furthermore, overly restrictive eligibility criteria for structural funding automatically exclude or discourage many organisations from applying. This puts civil society organisations at a disadvantage and deprives them of the opportunity to diversify their funding, thereby undermining the Programme's objective to support an independent voice of civil society.

### ***European Social Fund+***

EU Funds are a key tool to put EU policies into practice, have been fundamental for social reforms across Europe as well as for ensuring that the most vulnerable persons regardless of insurance or residence status have access to essential services. For example, the EU has been encouraging Member States to adopt a social, human rights-based and person-centred approach to care, and has promoted deinstitutionalisation for more than two decades. More recently, the EU has been promoting the integration of (social) care services, and encouraged Member States to prioritise housing support and services for homeless persons. The European Union, with its guiding role and financial support for social innovation and national reforms, has made it possible to complement national resources and bring forward the needed changes in social care systems across the EU.

Social services and civil society organizations are among the key players to effectively implement the European Social Charter and the EU's Social Agenda, including the European Pillar of Social Rights, the European Disability Rights Strategy, the EU Strategy on the Rights of the Child, the European Child Guarantee, the European Care Strategy, the Social Economy Action Plan, the European Platform on Combating Homelessness, as well as the future EU Anti-Poverty Strategy and Adequate Housing Initiative. To ensure that social services can continue playing their key role in the implementation of EU's Social Agenda, it is of great importance that the next Multiannual Financial Framework (MFF) contains a Social Fund with an adequate budget and priorities and with an effective governance structure, which can be taken up by social services and other social stakeholders.

To prevent social priorities being overshadowed by other priorities and potential future crises, it is important to guarantee a fund specifically dedicated to social policy, i.e. a successor

to the current ESF+, and which is not merged with any other new or existing EU fund. Having a specific Social Fund and dedicated budget is also needed to ensure alignment with social services' needs. Research found that this approach has indeed been effective in the current funding period: 60% of the social services thought that the priorities set by the EU are in line with their own, and that EU projects can fund the activities they really need<sup>5</sup>.

To ensure the future Social Fund delivers on the full European Pillar of Social Rights and its 20 principles, as part of the Action Plan on the Implementation of the European Pillar of Social Rights (2025), the EU should increase and leverage budget to the growing needs for each of its three chapters, namely: 1. Equal opportunities and access to the labour market; 2. Fair working conditions; and 3. Social protection and inclusion. To prevent the third chapter from being deprioritised, at least 25% of the future Regulation should be earmarked for social inclusion.

In some countries and regions, funding primarily reaches public authorities or a limited pool of organisations, leaving smaller, locally based not-for-profit social service providers without access due to barriers such as lack of open competition, excessively high budget thresholds, and co-funding requirements. However, these smaller providers play a crucial role in supporting marginalised groups and rural areas, offering specialised expertise and social innovation. To fully leverage their impact, we recommend earmarking at least 25% of the future Social Fund in each Member State for open calls specifically targeting not-for-profit organisations and increasing EU co-funding rates to at least 80% for social inclusion projects led by these providers.

Furthermore, it is vital to uphold the partnership principle by ensuring meaningful consultation with not-for-profit social services throughout the funding cycle. With the current foresight where cohesion policy will be planned under one single plan in each Member State, there is a risk that not-for-profit social services at all levels will not sufficiently be consulted. There should therefore be safeguards in place to ensure sufficient involvement of not-for-profit social services in the full funding cycle and their mandatory inclusion in the ESF+ committee, as well as in expert and consultative national committees.

Additionally, social services face significant challenges in accessing and managing EU funds, partly due to a lack of knowledge about ESF+ procedures, project application processes, financial management, and compliance with EU regulations. At the same time, Managing Authorities often lack the capacity to define, measure, and monitor the social impact of projects effectively. To bridge this gap, future EU regulations should include mandatory capacity-building components with earmarked funding and strengthen the partnership principle at EU and national levels.

In addition, other funds, such as the European Regional Development Fund, the Just Transition Fund, Erasmus+, Citizens, Equality, Rights and Values, and the Asylum, Migration and Integration Fund should also have a strong social component to ensure different needs of the most vulnerable population are being met, and to ensure complementarity between the funds. In this regard, new rules should allow for the ability to combine and blend funding from different Funds in the pursuit of social objectives.

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<sup>5</sup> EU Helpdesk Survey Report on Social Service Providers (2023). Available at: [https://eufunds4social.eu/wp-content/uploads/2023/03/EU-Helpdesk-cross-country-survey-report\\_SP.pdf](https://eufunds4social.eu/wp-content/uploads/2023/03/EU-Helpdesk-cross-country-survey-report_SP.pdf)

The programme must tackle social and labour market transformations, including the green and digital transitions, by investing in transversal competences and creating more complementarity and continuity between learning opportunities throughout an individual's life. Strengthening social protection systems is also crucial to provide a safety net for those experiencing poverty or at risk of exclusion, including minimum income schemes, unemployment benefits, adequate minimum wages, social assistance, and pensions. Promoting gender equality by closing the gender pay and pension gaps, supporting women in the workforce, and addressing barriers to women's economic participation is essential for poverty reduction.

The EU Youth Guarantee should be reinforced through enough funding and adequate investment to ensure better access to further education, training, apprenticeships and work, with decent working conditions. Funding should also be conditioned to quality employment standards such as no unpaid opportunities being offered under the Youth Guarantee; employers being only eligible if they do not use this scheme for job replacement; involvement of youth organisations and young people in the scheme's conception, implementation and evaluation, including the outreach phase.

On the model of the Youth Guarantee, a [Disability Employment and Skills Guarantee](#), to support more persons with disabilities into meaningful employment or training.

It is critical to ensure access to affordable social and public housing for socially disadvantaged people and also support projects of higher quality, promoting social inclusion and poverty reduction.

Adequate funds and minimum earmarking should be allocated for the European Child Guarantee and for all Member States to effectively implement their national action plans, including to support young parents in order to ensure equal opportunities for building families for current and future generations across European territories.

Moreover further funding should be dedicated to create the right public funding and investment conditions for not for profit social services and the social economy to thrive. Sufficient funding should be allocated for an ambitious implementation of the European Care Strategy. In particular, there should be public investment in Early Childhood Education and Care services and in the sector of care more broadly to underpin the promotion of the work-life balance for all. Recognise the value of (unpaid) care work, including in the family setting and that done by volunteers.

EU funding should support digitally and socially excluded groups such as students and persons with disabilities, NEETs, refugees, migrants irrespective of their status, elderly people, low-skilled adults, ex-prisoners, single-parent families, and low-income households, through digital transition programmes addressing the inaccessibility, unavailability, or unaffordability of technologies, the lack of connectivity (or threats to net neutrality) and reinforcing digital skills. Funding should support the design of digital technologies that are bias-free and inclusive. Although digital competencies and skills can be a valuable route into employment (including for vulnerable groups), their scope should not be limited to technical skills only, but should also include transversal competences, netiquette, empathy, sustainability, ethics and

skills related to content accessibility. Public programmes concerning developing digital skills and competencies could rely on CSOs and local initiatives as mediators and entry points, but this does not change the ultimate responsibility of the state.

Finally, further investment and measures to mitigate the effects of automation in affected sectors are needed—for example, retraining people who see their field of work displaced by rapid technological advancement. Encouraging social innovation by funding pilot projects, research, and scaling up successful initiatives can lead to new and effective solutions to enhance inclusion and poverty reduction.

### ***Regional Development & Cohesion***

Cohesion policy has a long history of successfully strengthening economic, social and regional cohesion across the EU. As we see an increasing focus on competitiveness as a primary objective of the EU, we stress that increasing the social cohesion in the EU is a prerequisite to increasing competitiveness. Europe's future competitiveness is also dependent upon tapping into the potential of all its territories and people, as highlighted by the report of the Group of High-Level Specialists on the Future of Cohesion Policy<sup>6</sup>.

For the EU to truly support its regions and communities, the next Multiannual Financial Framework (MFF) must prioritize regional development and cohesion by reinforcing multilevel governance and strengthening territorial approaches to policy implementation. Funding should be designed with a place-based approach, ensuring that cities, towns, and rural areas have the resources and flexibility to drive their own sustainable growth. Cohesion Policy remains one of the EU's strongest tools for reducing regional inequalities, but it needs to evolve—strengthening cross-border cooperation, expanding bottom-up initiatives like ITI, CLLD, and RIS3/4, and ensuring local governments have a real say in shaping policies that affect them. Decentralization must go beyond rhetoric, with concrete structural reforms that give local authorities more autonomy and financial capacity to implement solutions that work for their communities.

Given the current circumstances, it is crucial for the EU budget to prioritise investments in social progress and the reduction of inequalities. Compared to the existing financial framework, additional resources are necessary to enhance regional and social cohesion. This includes addressing poverty and social exclusion, as well as ensuring that labour market reforms and the digital and green transitions leave no one behind.

The partnership principle and shared management has long been at the heart of cohesion policy. Shared management and multilevel governance guarantee the active involvement of regional, local and territorial authorities, social partners, and civil society leading to strengthened governance and stakeholder engagement including the national authorities, regional authorities and civil society. This has helped nurture a participatory approach to programme planning, implementation and evaluation. This participatory approach is crucial for success, allowing for a better understanding of regional needs. It also contributes to

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<sup>6</sup> European Commission: Directorate-General for Regional and Urban Policy, Forging a sustainable future together – Cohesion for a competitive and inclusive Europe – Report of the High-Level Group on the Future of Cohesion Policy, February 2024, Publications Office of the European Union, 2024, <https://data.europa.eu/doi/10.2776/974536>

democratic engagement and the inclusivity of programming. It is therefore important to maintain the European Code of Conduct on Partnership in the next programming period, ensuring a balanced composition of the bodies tasked to supervise the implementation of the projects, and the representation of civil society from all the sectors affected by cohesion policy, with a specific focus on the groups most at risk of exclusion, such as persons with disabilities, representatives of the Roma community or people with migration experience. Furthermore, an appropriate earmarking of cohesion policy should be allocated to the administrative capacity building of social partners and civil society organizations.

National Plans Linking Reforms and Investments should earmark 2% of their budgets to culture, building on the successful experience of cultural investments during the pandemic. Member States would be free to choose how to shape their cultural policies to spend this 2%; however, they should follow the principles of artistic freedom, the autonomy of cultural institutions, geographically balanced funding, support for small and independent creators, and fair pay. If Cohesion Funds are reformed and incorporated into the National Plans, an additional requirement should be the earmarking of 2% of the Cohesion Funds to support cultural infrastructure ('hardware' grants and loans to invest in cultural centres, creative hubs, and sustainable equipment). The European Commission is urged to include a dedicated section on Artistic Freedom/Freedom of Artistic Expression in the Rule of Law Report, making Member States' access to National Plans' funding contingent on their demonstrated commitment to upholding artistic freedom, as evaluated in the report.

At the same time, the EU must support regions in tackling today's challenges—from the green and digital transitions to economic transformation—by ensuring they have direct access to funding for clean technologies, infrastructure improvements, and circular economy projects. No region should be left behind because of political roadblocks at the national level, so safeguards must be in place to ensure local authorities can receive funding even if their national governments fail to meet EU standards. Simplifying EU funding processes should not mean cutting corners on transparency or accountability—it should mean making it easier for local governments and communities to access the support they need. A stronger, fairer, and more inclusive MFF can empower regions, strengthen democracy, and create a more balanced, sustainable Europe for everyone.

## ***Sports***

Sport can be a catalyst for inclusion and European values can be upheld by promoting sports, especially through fair play initiatives. The 2021-2027 Erasmus+ programme currently covers sports staff & volunteer exchange; however this is not enough and we need to also include amateur athlete exchanges as well as a more holistic approach to sports.

Therefore, we propose to extend the current Erasmus + Sport KA1 opportunities and build a more comprehensive 'European Sports Exchange Programme' along the lines of the highly successful 'Erasmus Student Exchange Programme', in order to increase togetherness ('Europeanness') among EU populations, for amateur athletes and coaches alike.

This means supporting local movements and local communities for sports as a means for social inclusion as well as the establishment of European sports organisations and teams and

their sustainability and ensuring fairness in sports, especially in those disciplines that still rely heavily on amateurism. In addition, Sports organisations as well as sport infrastructure should be supported in poorer EU countries, following 'sports for development' guidelines and to foster sport cohesion.

### ***Technical Support Instrument***

The Technical support instrument is key to reinforce the capacity of implementation of the regional development, cohesion fund and recovery package. It should be further reinforced and maintained, ensuring also further targeting and use of civil society, and not just public administration, so as to improve effectiveness and sustainability on the ground.

### ***Union Civil Protection Mechanism (rescEU)***

Organised civil society, involving paid employees and volunteers, is often on the front line in civil protection issues at the local level, developing resilience and providing civil protection measures in the face of natural and 'human-made' disasters that impact people's security and safety. The EU Civil Protection Mechanism which aims to reinforce cooperation on civil protection between EU Member States and six Participating States to improve prevention, preparedness and response to disasters should be strengthened. When an emergency overwhelms the response capabilities of a country in the EU and beyond, it can request assistance through the Mechanism. The engagement of properly resourced and prepared civil society organisations in the response should be at the core of the EU policies in this field.

CSO representatives should be included in the Union Civil Protection Knowledge Network's board and Capacity Development Pillar working group for a more structured and all-encompassing engagement around disaster prevention and response operations, as well as in the European Civil Protection Pool to empower and better engage CSOs in disaster preparedness, response and recovery in the most appropriate way.

## ***Heading 3: Natural Resources & Environment***

### ***Agriculture & Maritime Policy***

Current funding should support and scale up community- and citizens-led initiatives, for instance on permaculture, stewardships of the earth, and regenerative agriculture, which show that diverse post-growth lifestyles are possible and attractive, offering rich solutions, methodologies and processes for social innovation and the governance of the commons.

### ***Environment & Climate Action***

The LIFE programme, including operational grants for civil society organisations, must be safeguarded and reinforced. It contributes to the strategic priorities of the EU, and it has a long and successful history of supporting bottom-up projects that ensure that a variety of

stakeholders are able to contribute to the EU's environmental objectives. It plays a fundamental role in ensuring the treaty-guaranteed open, transparent and regular exchange with civil society. The programme is crucial for financing nature and biodiversity, being the only programme that directly finances the most needed actions required for addressing biodiversity loss.

EU funding should support and promote collective action led by citizens, since such action is needed to answer the triple planetary crisis. This should be the focus of EU and Member States' funding programmes and regulatory frameworks. Structural support for community-led and volunteering initiatives towards sustainability would harness the power of collective action by citizens and improve social cohesion.

Support to low-income groups has to be financial – through lower taxes on small incomes and better social security – and not by sparing them from environmental regulations. The Social Climate Fund proposed by the European Commission in its Fit for 55 Package is recognition of the need to compensate low-income households. However, it only aims at temporary support and does not tackle the root cause of inequalities.

This could help to support workers who lose their jobs due to the green transition, for instance by using government programmes to assist them with relocation and reskilling, and to avoid shortages of employees in the renewable energy industries. Emergency mechanisms and social protection will be key to deal with current and future crises and increase the resilience of our societies.

#### ***Heading 4: Migration & Border Management***

##### ***Asylum, Migration and Integration Fund (AMIF)***

We believe that AMIF should scale up funding for civil society activities that promote and support the inclusion of refugees and migrants in the EU, regardless of their status.

The successor of the AMIF should include a strong component on social inclusion of migrants, which ensures their access services and inclusion measures from day one. A dedicated objective to social inclusion in the new regulation would allow to clearly allocate spending to social priorities, including access to healthcare, education, vocational training, and housing. Additionally, it is essential to avoid discrimination among recipients of inclusion measures by ensuring that such measures reach the widest target group possible. As migration status can change over time, it is crucial that the next AMIF does not prevent access to services to certain categories of migrants who may later gain status.

The EU should also establish and properly fund, for as long as the EU remains closed to arrivals, an EU search-and-rescue programme with a mandate to save lives at the dangerous points of the EU's external borders, in particular in the Mediterranean Sea.

While AMIF is a key funding instrument for migration management in the EU, its keen focus under the new Pact operational framework leans heavily toward border control, returns, and

security measures, more than social inclusion. We urge the EU to ensure that AMIF maintains a strong, dedicated component for Civil Society and integration, guaranteeing access to social and public services. Social inclusion should not be secondary to deterrence policies. The lack of structured consultation with CSOs on AMIF priorities is alarming. We call for increased funds, direct access to AMIF funding for civil society, recognizing our role in fostering inclusive communities, countering xenophobia, and ensuring accountability in migration policies. Furthermore, AMIF monitoring committees should be reinforced, ensuring a balanced composition, including civil society organisations, safeguarding the independence of the selection process of the CSO representatives, and strengthening their oversight and inquiry powers.

### *Heading 5: Security & Defence*

Security should be understood in a broad manner through the lens of freedom from fear regarding own human, social, ecological and cultural needs which requires strong democracies, respect for the right to privacy, social and environmental justice, peace-building and inclusive access to fundamental rights. Security should not be narrowly defined by militarization or the fight against external threats, leading to the potential restriction of civil liberties and scapegoating already excluded groups. Instead, it should focus on safeguarding people's health and well-being and ensuring both individual and collective freedoms and fundamental rights. Today, one of the key challenges that European democracies face is the growing polarisation, precarity and disempowerment. Responding to people's need for security by solely focusing on a narrow, external military focussed approach is unlikely to be successful. Efforts to defend democracy should focus on addressing precarity and uncertainty about the future, with the aim of rebuilding people's trust in the institutions and each other. An ecosystem of democratic resilience, with digital & media literacy, human dignity, and civic participation at its core needs to be fostered. This includes promoting public debate on the purpose and value of digital and AI for society, the risks to societal security (including cybersecurity) and well-being that they can cause, as well as achieving a greater awareness and understanding of the potential of digital solutions for security and defence solutions. The risk of overemphasising repression and aggression in the context of security is that it could undermine efforts to address the root causes of democratic erosion such as the breakdown of trust and mutual understanding.

The specific role that civil society organisations can play to foster trust, solidarity and promote policies that contribute to security relies on funding, training and support for the promotion and realisation of opportunities for citizen participation and volunteering to act in a timely and appropriate manner at the local level in promoting inclusion and prevention of all kinds of violence (including online hate speech), reducing polarisation and building resilience.

Funding programmes should recognise the role of civil society organisations in this field, boost their support and input when elaborating security policies and ensure that they are founded on people's fundamental rights. In this regard, civil society organisations engaged in counter-radicalisation and reduction of polarisation activities should be better supported and recognised for their efforts.



In addition, investments into cyber security, both for the purpose of elections and beyond elections should be stepped up.

Furthermore, culture should become a strategic pillar of the European Democracy Shield. The EU should invest in cultural and civic participation as a strategic pillar for security, resilience, and critical thinking, supporting citizens' resilience against authoritarian influence and the erosion of democratic legitimacy.

### *Heading 6: Neighbourhood & the World*

Civil society supports the continuation of the EU's development and international cooperation instrument (NDICI), humanitarian aid instrument (HUMA), and instrument for pre-accession (IPA) as standalone programmes. Any merger of such programmes into a single instrument believe such an overhaul risks undermining the EU's ability to achieve its objectives and honor its commitments. Flexibility is essential for responding to unforeseen challenges, but it must be balanced with predictable funding to ensure the EU can meet its long-term goals and maintain accountability for its expenditures.

Maintaining separate instruments enables the EU to effectively pursue its humanitarian, development, and enlargement objectives without compromising their integrity, focus, or visibility. It also provides the flexibility needed to tailor actions to specific contexts. Each instrument serves a distinct purpose and operates within dedicated principles and frameworks. Merging these instruments into a single framework risks undermining their unique objectives and effectiveness.

If the European Commission consolidates three smaller instruments into one large framework, it might create the impression of substantial funding for external action. However, this approach increases the risk of budget cuts during negotiations, potentially leaving less funding available for each specific purpose. Furthermore, on an annual basis, managing trade-offs would become increasingly complex. Humanitarian crises could require immediate reallocation of funds, potentially diverting resources from long-term development programs or pre-accession assistance. Accession-related needs - difficult to predict but expected to grow as the EU expands eastward - might further strain development and humanitarian aid budgets. And if Member States perceive that humanitarian aid is being compromised, they may choose to channel their contributions bilaterally, undermining the EU's collective response.

Maintaining separate instruments ensures clearer accountability, enabling more straightforward scrutiny of funds and their impact. It is unclear who would provide the strategic steer for implementing a single, merged external instrument. Currently, each instrument operates with its own governance structure and accountability mechanisms, which are essential for ensuring transparency and effectiveness. Finally, a single instrument might foster a transactional approach to cooperation, and competition between accession countries and cooperation countries, risking alienating fragile states, undermining the EU's soft power, and eroding trust in its commitment to development goals.

Furthermore, the EU's principles and priorities should be consistently applied across all EU external action instruments, and the principles governing the use of EU funds internally are mirrored in the EU's approach to external action.

### ***Common Foreign and Security Policy***

Funding should shift towards a bottom-up approach in conflict prevention, crisis management and peacebuilding policies and operations, in order to have a community-oriented perspective and, thus, better respond to the local security demands.

In particular an integrated approach to conflict and crises, as part of the EU Global Strategy, should be prioritised merging crisis management with a long lasting peacebuilding and post-conflict reconstruction and development of communities affected by conflicts, all of which should involve a broader and more structured involvement of CSOs and regional and local actors as bridgebuilders playing a key role in reducing polarisation and bringing people together.

The EU should work closely together with CSOs to design policies for reconstruction and reconciliation in countries affected by conflicts, including for Ukraine's reconstruction. 2% of the frozen Russian assets seized for Ukraine's aid should be allocated to Ukraine's cultural recovery.

### ***Global Europe: Neighbourhood, Development and International Cooperation Instrument***

Funds for international cooperation should be in line with Treaties and international commitments and these should not be instrumentalised for EU security/defence/economic/migration purposes.

The EU should continue to step up its support in this area given also the sudden halt of funds by the US Administration that affects a broad spectrum of civil society organisations with dramatic consequences on the ground. The loss of these programs will leave hundreds of thousands without support and will pose a threat to the security of people in the region.

Funding allocated to military actors should be complemented with resources to support stronger political, diplomatic and developmental action to drive human security, climate transition and climate justice across the globe.

The Global Gateway strategy should be balanced with other approaches to international cooperation. In particular, the Global Gateway Strategy should have effective means to address sustainable development and inequalities.

The programmes should dedicate actions to invest in human development sectors, which play a key role in the achievement of the Sustainable Development Goals. Notably it should cover investment in education, health, climate, and other policies that strengthen democracy. This goes along robustly supporting civil society which plays a crucial role in delivering on all these

policies in a socially just manner. Particular emphasis should be placed on supporting civil society outside of the EU in all its diversity, including through long-term, core funding and structured and systematic dialogue at EU institutions and EU delegations levels.

Community resilience should be a pillar of the EU's external action, insisting on the commitment of the EU in building resilient societies by reinforcing democratic mechanisms, developing accountable and institutions and reinforcing the civic space.

Funding to protect human rights and HRDs globally should be scaled up, including by supporting the implementation of the EU Guidelines on HRDs<sup>46</sup> to the fullest extent and in all places; supporting the creation of local and regional networks of HRDs (with political and technical funding); enabling HRDs to travel—particularly to escape difficult situations and to attend international conferences—by facilitating their access to visas; actions for involving HRDs in consultations, including HRDs in rural areas and women HRDs; and always prioritising consent from HRDs for any support.

We also propose to include actions to champion cultural heritage as an engagement strategy within and outside the EU to encourage mutual appreciation and understanding of different communities, nations and peoples.

Investments in digital infrastructure as part of the Global Gateway should be based on equal partnerships and local ownership, and should prioritise investments that will support digital inclusion and the reduction of digital divides. Strong standards should be established for the involvement of the private sector, in order to ensure that projects are aligned with development principles, environmental standards and human rights, rather than private sector interests.

The Digital for Development (D4D) Hub should be continuously supported by both the EC and Member States, in order to facilitate a global dialogue with stakeholders across the globe based on a human-centric approach to digital transformation.

As part of the External Action Funding pillar, it is suggested to revise the Strategy for International Cultural Relations and allocate 2% of this pillar for the Strategy implementation. One option is establishing a Global Cultural Cooperation Fund to support partnerships with third-country organisations not associated with Creative Europe.

### *About Civil Society Europe*

[Civil Society Europe](#) (CSE) is the coordination of civil society organisations at EU level. Through its membership, CSE unites EU-level membership-based organisations that reach out to millions of people active in or supported by not-for-profits and civil society organisations across the EU. CSE was created by several civil society organisations as a follow-up to the European Year of Citizens and was established as an international not-for-profit under Belgian law in 2016. Since then, it has become the point of reference for EU institutions on transversal issues concerning civil dialogue and civic space.

*Additional resources*

- [Culture Action Europe](#);
- [European Patients' Forum](#)
- [European Students' Union](#)
- [European Youth Forum](#)
- [Lifelong Learning Platform](#)
- [Philea](#)
- [Social Services' Key Messages for the Next EU Multiannual Financial Framework](#)
- [Refinement, Not Overhaul: External action in the next MFF \(MFF hub, co-signed by 30 organisations\)](#)
- [The next EU budget must keep supporting marginalised groups \(by EDF\)](#)
- [Uphold EU Global Leadership: Reject the Merger of External Financing Instruments](#)
- [Young European Federalists \(JEF Europe\)](#)