

Recommendations in view of the post-2027 Multiannual Financial Framework, based on the lessons learnt from the Recovery and Resilience Facility – from a civil society perspective

1. *Introduction*

In February 2025, the European Commission (EC) published its Communication ‘The road to the next multiannual financial framework’, followed in April 2025 by the Communication ‘A modernised cohesion policy: the mid-term review’ and legislative proposals to amend the Just Transition Fund (JTF), the European Regional Development Fund (ERDF), the Cohesion Fund and the European Social Fund+ (ESF+). These measures have triggered crucial discussions on the Multiannual financial framework (MFF) for the next programming period (2028-2034), which have culminated in the annual conference on the EU Budget in May 2025.

The EC proposals for a mid-term review (MTR) of cohesion policy aim at introducing more leeway in the expenditures related to the years 2026 and 2027, with a particular focus on competitiveness and industry’s productive capacities in the defence sector. Two additional policy objectives are added: affordable housing and the promotion of access to water, sustainable water management and water resilience. The ESF+ regulation is amended to deploy the development of skills in the defence domain, and to finance a Skills Guarantee pilot to provide workers involved in restructuring processes or at risk of unemployment with reskilling opportunities in other companies or sectors.

This Paper contains recommendations from the perspective of civil society organisations (CSOs) in view of the next MFF. In 2020 and 2021, Civil Society Europe (CSE) conducted two studies on CSOs’ involvement in the Recovery and Resilience Facility (hereinafter RRF) and in the National Recovery and Resilience Plans (NRRPs) – see Annex I. The recommendations presented in this Paper are based on the lessons learned from the involvement of CSOs in the preparation, implementation and monitoring of national plans to implement the RRF, whose governance model has been chosen by the EC as a source of inspiration for the next MFF. A comparison will also be made with the implementation of the partnership principle in cohesion policy funds, which is still the main reference point for the involvement of civil society in the EU Budget cycle.

Civil Society Europe (CSE) is the coordination of civil society organisations at European (EU) level, representing 24 European networks and federations of civil society organisations (CSOs). Through its membership, CSE reaches out to millions of people who are active in or supported by not-for-profit organisations and CSOs across the EU. Established in 2014, CSE has carved out a unique space as the most representative organisation gathering CSOs interested in strengthening the role of civil society and civic space at EU level. It is recognised as the point of reference for EU institutions on all matters regarding civic space and civil society involvement in policy-making, which is defined by the term ‘civil dialogue’. CSE’s mission is to contribute to EU and national institutions’ recognition of the essential role and value of independent and plural civil society organisations (CSOs) in building and nurturing a democratic society based on fundamental rights. We strive to create the conditions for the development of a strong and independent civil society voice at EU level, as well as a thriving and enabling civic space across the European Union.

2. *Ten recommendations from civil society in view of 2028-2034 MFF*

1. To strike a balance between persisting political priorities and new ones and to respond to emerging crises in an effective way, adopt an increased budget for the period 2028-2034.
2. Cohesion policy must remain at the core of the next EU budget and based on multi-level governance to fulfil its essential mission of ensuring an harmonious economic, social and territorial development across the EU.
3. In the next EU Budget, maintain a multi-level governance management model based on a meaningful partnership principle and involvement of all relevant actors, including civil society organisations.
4. In the next EU Budget, ensure that all funding programmes are subject to the rule of law and the horizontal principles of ensuring the respect of fundamental rights, equality and non-discrimination, accessibility, and the promotion of sustainable development.
5. While there is scope to simplify the landscape of EU funding programmes, some key programmes and funds should remain as standalone programmes to fulfil EU core policy objectives.
6. Ensure the involvement of civil society organisations and other relevant stakeholders in the preparation of EU funding programmes, in a transparent and accessible manner. Provide citizens and media with transparent information about fund beneficiaries and amounts spent.
7. Make sure that civil society organisations are recognised as direct beneficiaries of EU funding programmes and set the conditions for their meaningful involvement in the implementation phase.
8. Ensure the involvement of civil society organisations in the oversight mechanisms to monitor and evaluate the performance of EU funding programmes.
9. For all EU funding instruments, ensure that adequate technical assistance for the administrative capacity of the authorities responsible for the implementation of EU funding programmes and capacity building of stakeholders, including CSOs, is available.
10. Simplify eligibility criteria, rules, application and reporting processes for final beneficiaries of EU funding instruments.

Table of contents

Recommendation no.1: To strike a balance between persisting political priorities and new ones and to respond to emerging crises in an effective way, adopt an increased budget for the period 2028-2034.....	4
Recommendation no. 2: Cohesion policy must remain at the core of the next EU budget and based on multi-level governance to fulfil its essential mission of ensuring an harmonious economic, social and territorial development across the EU.....	4
Recommendation no. 3: In the next EU Budget, maintain a multi-level governance management model based on a meaningful partnership principle and involvement of all relevant actors, including civil society organisations.....	5
Recommendation no. 4: In the next EU Budget, ensure that all funding programmes are subject to the rule of law and the horizontal principles of ensuring the respect of fundamental rights, equality and non-discrimination, accessibility, and the promotion of sustainable development.....	6
Recommendation no. 5: While there is scope to simplify the landscape of EU funding programmes, some key programmes and funds should remain as standalone programmes to fulfil EU core policy objectives.....	8
Recommendation no. 6: Ensure the involvement of civil society organisations and other relevant stakeholders in the preparation of EU funding programmes, in a transparent and accessible manner. Provide citizens and media with transparent information about fund beneficiaries and amounts spent.....	11
Recommendation no.7: Make sure that civil society organisations are recognised as direct beneficiaries of EU funding programmes and set the conditions for their meaningful involvement in the implementation phase.....	12
Recommendation no. 8: Ensure the involvement of civil society organisations in the oversight mechanisms to monitor and evaluate the performance of EU funding programmes.....	13
Recommendation no. 9: For all EU funding instruments, ensure that adequate technical assistance for the administrative capacity of the authorities responsible for the implementation of EU funding programmes and capacity building of stakeholders, including CSOs, is available.....	14
Recommendation no. 10: Simplify eligibility criteria, rules, application and reporting processes for final beneficiaries of EU funding instruments.....	16
Annex I – key findings from Civil Society Europe’s studies on the involvement of civil society in the Recovery and Resilience Facility and its national plans.....	17
Annex II – Distinctive benefits of working in partnership.....	23
Annex III – References.....	25

Recommendation no.1: To strike a balance between persisting political priorities and new ones and to respond to emerging crises in an effective way, adopt an increased budget for the period 2028-2034.

Since the adoption of the 2020-2027 MFF, the EU has faced significant geopolitical and socio-economic challenges, such as the COVID-19 pandemic, escalating climate events, wars in Europe and in the Middle East, cyber threats, and a rise in energy and living costs. The lessons learned from the COVID-19 pandemic, which strained health systems and revealed critical dependencies in global supply chains, were a primary catalyst. Concurrently, the accelerating impacts of climate change demand urgent adaptation measures, while growing geopolitical instability necessitates a stronger security posture and a reinforcement of the EU's strategic autonomy. As a consequence, the EU policy landscape has shifted, with renewed emphasis on competitiveness, regulatory simplification, and economic security.

While in this context the focus on competitiveness, security and preparedness can be partly understood, the next EU Budget should ensure a **balance between financing long-lasting policy priorities and providing additional resources to face the new political priorities** and counter possible new crises in a timely and effective way. For this reason, **maintaining the current size of the EU Budget in the next programming period will not be enough**. New resources will have to be found and added, and the EU should explore the possibility to issue common debt to finance transnational investments in common European public goods (see CSE's [Common Civil Society position paper on the outline of the 2028-2034 Multiannual Financial Framework](#)). It is necessary to avoid in the short, medium and long term a competition between long-standing and new priorities.

Recommendation no. 2: Cohesion policy must remain at the core of the next EU budget and based on multi-level governance to fulfil its essential mission of ensuring an harmonious economic, social and territorial development across the EU.

Cohesion policy has always been a core element of the EU Budget, with almost one third of the total allocation assigned to it. The essential role of cohesion policy in ensuring an harmonious economic, social and territorial development across the EU is enshrined in article 174 of the Treaty on the functioning of the EU (TFEU). Moreover, articles 162-164 TFEU establish the European Social Fund to improve employment opportunities. Cohesion policy aims at alleviating territorial, social and economic disparities, directing its financing towards the most disadvantaged regions and areas of the EU.

Both the European Court of Auditors (ECA) and several cohesion policy experts have warned about the risks contained in the cohesion policy MTR proposals to reallocate unspent cohesion policy funds to new priorities related to competitiveness, defence, affordable housing, water resilience and energy transitions. This would entail diverting resources from its core mission of reducing regional disparities and adding further to the fragmentation and complexity of cohesion policy programmes – which would be the exact opposite of the purpose of simplifying the EU Budget. As observed by ECA, these proposals were adopted without carrying out an impact assessment, as required by the Better Regulation Guidelines. In particular, defence-related investments may not always align with the territorial development strategies and regional bottom-up approach that underpin cohesion policy (ECA,

2025a). The European Policy Centre highlighted that the MTR proposals to reorient funds towards the new priorities might be an opportunity for the most developed regions and will likely jeopardise the already limited administrative and industrial capacity of the regions which are less advantaged and least innovative. Moreover, as the reprogramming of cohesion policy plans will have to be concluded by Member States by the end of this year, a tight deadline for action could see the adoption of national positions that overlook the partnership principle or specific regional needs (European Policy Centre, 2025a).

Recommendation no. 3: In the next EU Budget, maintain a multi-level governance management model based on a meaningful partnership principle and involvement of all relevant actors, including civil society organisations.

CSE joins the voice of many institutions and actors expressing concerns about the **recent increasingly centralised and top-down decision-making approach to EU policies, including the EU Budget**. It is not clear why the EC is taking the centralised governance model of the Recovery and Resilience Fund (RRF) as a blueprint for the next EU Budget, at a time when other EU institutions, many relevant stakeholders and academics/experts have pointed out its deficiencies. The President of ECA stated that approximately half of the RRF disbursement had not reached the real economy. Various reports and opinions of ECA highlight several shortcomings of RRF and national plans, such as overall lack of transparency, weaknesses in Member States' control systems, double funding, frauds, possible cases of greenwashing, etc. (ECA, 2023; ECA, 2025b).

The main finding of the two studies conducted by CSE on the involvement of CSOs across the programme cycle of RRF is that RRF represents a step back on stakeholders' involvement compared to cohesion policy funds (see Annex I). The European Economic and Social Committee (EESC) concluded the same in its RRF mid-term review (EESC, 2023). The same can be said concerning the involvement of local and regional authorities (LRAs). For example, the Council of European Municipalities and Regions (CEMR) argues that 'the inadequate framework for involving subnational governments in decision-making raised concerns about fair and transparent fund distribution, especially for the EU's green and digital transitions. This centralisation of funding has hindered the effective use of available funds at the territorial level, leading to overlaps with Cohesion Policy funds, and complicating its coordination and alignment with other EU resources' (CEMR, 2025).

For all these reasons, **the partnership principle and the European Code of Conduct on Partnership (ECCP) enshrined in the Common Provisions Regulation (CPR) should be maintained in the next programming period, not only in relation to cohesion policy funds, but should be extended as much as possible to other funding programmes, whenever relevant**. The partnership principle is positioned as both a vehicle for promoting democratic processes and policy coherence through alignment of objectives between different levels of governance. These dual strands of stakeholder ownership and multi-level governance are encompassed in the European Pillar for Social Rights (EPSR), the European Semester coordination framework, and on a global level, in the 2030 Agenda for Sustainable Development. The partnership principle, if properly implemented, has proven to deliver positive solutions for the places and people affected.

Another lesson learned from RRF was the very limited involvement by the lead Ministries (usually Ministries of Finance/Economic Policies) of other Ministries such as Employment and Social Affairs Ministries and Environmental Ministries, which were asked to provide contributions very late in the process, with very little information at their disposal on the content of the plans and very short time frames. This led to missing out on their expertise and experience in managing EU funds.

As the Commission is planning to deliver cohesion policy in the next MFF by the means of National and Regional Partnerships, to ensure true representativeness, any lead Ministry or authority should involve relevant other Ministries, such as those in charge of employment, social inclusion, youth, gender equality, environment, education and culture, across the whole programme cycle. Fuller consideration should also be given to the relevance, timing and 'fit' of diverse inputs in different contexts and programme phases, with selection based on the most appropriate partners for particular themes and focus areas. The Authorities responsible should be able to demonstrate that diverse views have been carefully considered and the reasons why a particular decision or action has been taken or not should be fully explained.

Concerted efforts should be made to integrate the local voice in programme cycles through place-based, bottom-up and participative approaches such as Community-Led Local Development (CLLD) and co-production.

The European Community of Practice on Partnership (ECoPP) made a [statement](#) calling for the Partnership Principle to be linked to the European Semester and more integrated policies and funds after 2027, and for European institutions, in particular the European Commission, to actively support its application and endorse its legally binding nature through a revised ECCP.

As the application of the partnership principle in the next period is unsure, Annex II recalls the benefits of working in partnership with all relevant actors, including CSOs, in the design, implementation and monitoring of EU funds.

Recommendation no. 4: In the next EU Budget, ensure that all funding programmes are subject to the rule of law and the horizontal principles of ensuring the respect of fundamental rights, equality and non-discrimination, accessibility, and the promotion of sustainable development.

In line with article 3 TEU and articles 10 and 11 TFEU, in the next programming period, horizontal principles should be respected in the use of all EU funding programmes and across the whole programme cycle, mirroring art. 9 of CPR. Horizontal principles regard the respect of fundamental rights in compliance with the Charter of Fundamental Rights of the European Union, gender equality and gender mainstreaming, non-discrimination, accessibility for persons with disabilities, the objectives of sustainable development, taking into account the UN Sustainable Development Goals, the Paris Agreement and the "do no significant harm" principle. Horizontal principles, horizontal and thematic enabling conditions in cohesion policy funds have been an effective tool to ensure that essential pre-conditions are in place for a correct and effective use of funds. They have also played an important role in aligning national (and regional) reforms and/or strategies and the spending of funds related to them

with overarching policy frameworks such as the UN Convention on the Rights of Persons with Disabilities (UNCRPD), the European Pillar of Social Rights (EPSR) and the Sustainable Development Goals (SDGs). Despite the existence of these conditionalities, the use of cohesion funds is far from being optimal.

To give some examples, the FURI project recently found violations of fundamental rights in 63 projects funded by CPR funds in six countries, for a total of 1.1 billion €. ¹ Another example is that despite the existence of an obligation to ensure deinstitutionalisation and to support the transition from institutional care to family- and community-based care, 1.5 million people in the EU still live in institutions, excluded from society, deprived of their rights, and exposed to harm and abuse (European Expert Group on the transition from institutional to community based care – EEG, 2020). Moreover, the Platform for International Cooperation on Undocumented Migrants (PICUM) and the European Council on Refugees and Exiles (ECRE) reported that as of January 2023, 8 national programmes in 3 Member States had been adopted which were not compliant with the effective application and implementation of the Charter of Fundamental Rights. This was the case for Hungary (AMIF, BMVI, ISF), Poland (AMIF, BMVI and ISF) and Cyprus (AMIF and BMVI), covering a total of around 1 billion euros of the EU budget. We recall that while assessing the national programmes, should the European Commission conclude that the enabling conditions are not respected, the programme can still be approved, but reimbursements will not be possible until the Member State fulfils its obligations (PICUM and ECCRE, 2023).

CSE and many other civil society organisations and coalitions have repeatedly stressed that one major shortcoming of programmes such as InvestEU and RRF is that the horizontal and thematic conditionalities set out for cohesion funds were not applicable to them. It is now urgent to redress this in the next EU Budget, ensuring policy coherence internally (e.g. the thematic conditionalities linked with the EPSR²), as well as the respect of international obligations such as the UNCRPD and the SDGs in the use of EU funds.

In 2021, CAN Europe, CEE Bankwatch Network, Euronatur, and the European Environmental Bureau, published a [paper](#) providing an initial assessment of NRRPs pointing out critical elements in the plans concerning environmental conditionalities, calling on decision makers to urgently intervene to maximise their climate ambition and impact, and to prevent damage to the climate and nature.

Furthermore, from the current MFF, the EU funds are subject to a general Rule of Law Conditionality Mechanism, through which suspension of EU funds can be done if there are breaches of the Rule of Law that can affect the sound financial management of the EU budget or the protection of the financial interests of the Union. While this instrument has been used during the current programming period, notably to freeze the disbursement of EU funds to Hungary, very little connections between the country recommendations under the Rule of Law Cycle and the Rule of Law Conditionality are established. From the next MFF, the regulation on the Rule of Law Conditionality should be strengthened: in particular, the failure to establish pathways towards the implementation of the country recommendations and the non-compliance to the rulings of the Court of Justice of the European Union (CJEU) should also

¹ See the final report of the project '[FURI - EU Funds for Fundamental Rights](#)', funded by the CERV programme.

² See for example recommendation no. 3 of Social Platform's position paper 'A post-2027 Multiannual Financial Framework for Social Europe'.

be considered among the conditions for the adoption of the measures set out by the regulation.

Recommendation no. 5: While there is scope to simplify the landscape of EU funding programmes, some key programmes and funds should remain as standalone programmes to fulfil EU core policy objectives.

CSE calls for keeping the successors of ESF+, LIFE, Erasmus+, Horizon Europe, the Citizens, Equality, Rights and Values (CERV) programme, and Creative Europe, as standalone funds/programmes in the next EU Budget. The main reason is that these programmes/funds are crucial to financially support EU policies and initiatives in the domains of employment and social inclusion, protection of the environment, education and life-long learning, research and innovation, fundamental rights and the rule of law, and culture. Without adequate financial allocations, the implementation of such EU policies and initiatives by Member States will be severely jeopardised. Moreover, the above mentioned programmes/funds have traditionally been an important tool to sustain CSOs and civil dialogue. It is worth recalling that Russia is spreading disinformation in the EU and is supporting European far-right parties and movements to create divisions in European societies. When it comes to security, social cohesion, and social protection, CSOs play an essential role that should not be overlooked. In the following paragraphs, we will examine the specific reasons to keep the above-mentioned programmes/funds as standalone.

ESF+ derives from the European Social Fund (ESF) that was established by the Treaty of Rome in 1957 (now articles 162-164 TFEU). The ESF was created as an employment-related fund, to facilitate access to employment and workers' adaptation to industrial and production systems changes, by means of vocational training and retraining. With time, the ESF and its successor ESF+ have widened their scope, to cover alongside employment policies, social policies in a broad sense (social protection, social inclusion, Roma inclusion, fight against poverty, social exclusion and homelessness, skills and life-long learning, work-life balance, deinstitutionalisation and community-based services, accessibility, equal opportunities and non-discrimination, etc.).

ESF+ is the main funding instrument to implement the European Pillar of Social Rights (EPSR) and to shape a **strong Social Europe**, which is the foundation not only of citizens' prosperity and well-being, but also of a **competitive economy**. The successor of ESF+ should remain strongly linked with EPSR and existing and forthcoming strategies and policy initiatives, such as the care strategy, the Social Economy Action Plan, the new EPSR Action Plan, the Affordable Housing Plan, the Union of skills, the new EU anti-poverty strategy, and the new Quality Jobs Roadmap. As highlighted by Social Platform, the EU is currently not on track to meet its 2030 target of reducing the number of people at risk of poverty by 15 million, including 5 million children. Yet, poverty has only decreased by 1.6 million since the target was adopted in the EPSR Action Plan in 2021, and child poverty has actually increased since 2021 with 20 million children at risk of poverty and social exclusion (Social Platform, 2025)³. The same call to keep

³ Position paper: A post-2027 Multiannual Financial Framework for Social Europe, Social Platform (March, 2025) <https://www.socialplatform.org/content/uploads/2025/04/post-2027-mff-policy-paper.pdf>

the successor of ESF+ as a separate fund comes also from a coalition of 65 European CSOs and multiple national CSOs⁴ and from the European Parliament (European Parliament, 2025a).

A recent Eurobarometer survey 'Investing in fairness' highlighted that 4 out of 5 EU citizens are worried about social issues. When asked about their concerns for the future of their household, 88% of respondents mention the daily cost of living, 67% not receiving a fair salary, 64% the lack of job opportunities and 61% not being able to pay their rent or mortgage.⁵

In the environmental community, there's growing concern over leaked proposals to absorb **LIFE** into a broader 'European Competitiveness Fund', which could undermine the programme's environmental focus and dilute its impact. In a letter to Commission President von der Leyen and key Commissioners, a group of 67 Members of the European Parliament strongly defended keeping LIFE as a stand-alone fund for nature and climate. With Europe already facing the impacts of droughts, floods, and wildfires, now is the time to boost, not shrink, environmental investment.

As recalled by the Erasmus+ Coalition, gathering 81 EU-level organisations, in the 2018 Standard Eurobarometer 90⁶ Europeans ranked the **Erasmus+** Programme as the 4th greatest achievement of the EU, just behind free movement, peace and the euro. The high appreciation is reflected in the growing participation in the programme. In 2024, the EU reached 16.5 million Europeans benefitting from the programme, a doubling in participation since 2014, but still far from the Conference on the Future of Europe's demand to give universal access to the Erasmus+ programme. Furthermore, while 70% of the programme is still dedicated to learning mobility, 30% of it is devoted to cooperation and policy initiatives tackling urgent challenges of the education sector, such as the Erasmus Teacher Academies, European University Alliances, the EU Youth Strategy or Centres for Vocational Excellence. Erasmus+ is more than a mobility scheme, it is a catalyst for European cooperation. Its capacity to support education policy reforms must be fully leveraged to address long-standing and deep-rooted challenges across Member States. In this regard it is also crucial to acknowledge the importance of EU-wide civil society networks supporting coordination across all beneficiaries of the programme in this context.

Similarly, the **Horizon Europe** programme is one of the most recognisable EU programmes, being the biggest transnational research and innovation programme in the world: as reported by the EC, 17 813 proposals were created and supported between 2022 and 2024, 26 972 distinct organisations have been involved in its projects, 33 273 full-time-equivalent jobs have been created and maintained in Horizon Europe projects, and 7 753 peer reviewed scientific publications have resulted from the programme (EC, 2025-c). Therefore, the whole academic community, from the European University Association (EUA, 2025) to more specialised research-intensive university networks (LERU et al., 2025), to doctoral candidates (Eurodoc, 2025a) call for a standalone programme (the so-called 10th Research Framework Programme - FP10) in the next MFF. Such a call has been supported by a joint letter by LERU and The Guild, and supported by national rectors' conferences representing over 1,000 universities across Europe, other European university networks, and personally signed by more than 200 university leaders (LERU, the Guild, 2025). The initial ventilated proposal to merge Horizon

⁴ Joint statement, [Time for ambition: The EU needs a strong Social Fund to live up to its commitments](#)

⁵ Eurobarometer 'Investing in fairness'.

⁶ <https://europa.eu/eurobarometer/surveys/detail/2215>

Europe in the European Competitiveness Fund would make FP10 vulnerable to shifting political priorities and funding reallocations, while research and innovation require long-term, predictable funding; placing FP10 within a politically driven structure risks undermining Europe's ability to support basic research; stronger emphasis on industrial competitiveness could restrict international collaboration, key horizontal priorities such as the European Research Area (ERA) and widening participation could be deprioritised; furthermore, an exclusive focus on competitiveness risks marginalising Social Sciences, Humanities, and the Arts; finally, efforts to streamline funding rules could instead lead to increased bureaucracy and administrative burden (for more information, see EUA, 2025). In this sense, the public commitment by the Commission President that Horizon Europe will remain a standalone programme has been welcomed by the different actors of the research and innovation sector (see for instance LERU (2025), Eurodoc (2025b)).

Across Europe, coordinated and systemic attacks are waged against the EU values of democracy, the rule of law, equality and fundamental rights. These attacks are already impacting the lives of marginalised communities, the safety of activists, and the integrity of democratic institutions. In recent years, the EU has acknowledged⁷ the increasing pressure faced by CSOs across Member States and at EU level⁸. Furthermore, the new EU commitments on the Civil Society Strategy, the Democracy Shield and the renewal of the Union of Equality Agenda require a strong financial commitment in the next MFF. As recalled by [CSE's statement](#), despite its small size, **CERV** enables organisations to reach communities, support marginalised groups, safeguard the rule of law, strengthen democratic participation, advocate for progress, respond to national-level repression, hold institutions accountable – often in difficult and hostile environments, and deliver on the EU's legal and political commitments. The importance of such programme is explicitly recognised in the Strategy to strengthen the application of the Charter on Fundamental Rights in the EU⁹. That is why CERV shall remain standalone, with increased budget to support current policy strands and the new ones required by the above mentioned policy commitments. EU direct management and the regranting scheme by beneficiaries allow an important lifeline for civil society organisations in difficult and hostile environments in different EU Member States, and should be kept and reinforced. The European Policy Centre is also calling on the Commission to keep CERV as a standalone programme, as the key EU programme for investing in a resilient society and democracy (EPC, 2025b).

Lastly, CSE and, in particular, its member [Culture Action Europe](#) (together with more than 1300 cultural sector professionals and representing 500+ organisations from 40 countries) recommend that **Creative Europe** also remains a standalone programme. A recently

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<https://www.consilium.europa.eu/en/press/press-releases/2023/03/10/fundamental-rights-council-approves-conclusions-on-the-role-of-the-civic-space/>;

https://www.europarl.europa.eu/doceo/document/TA-9-2022-0056_EN.html;

https://commission.europa.eu/publications/2022-charter-report-fra-summary-reports_en;

https://fra.europa.eu/sites/default/files/fra_uploads/report-key-findings-fra-civic-space-consultation-covering-2023.pdf;

<https://fra.europa.eu/en/news/2025/fra-statement-recent-developments-affecting-civil-society-and-fundamental-rights>

⁸<https://civilsocietyeurope.eu/wp-content/uploads/2025/05/07.05-Civil-Society-Europe-NGO-Funding-Statement.pdf>

⁹<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0711>

published Eurobarometer survey¹⁰ shows that 87% of respondents believe culture and cultural exchange should have a very important place in the EU. While Creative Europe is in line with the new EU policy priorities (competitiveness of Europe's cultural and creative sectors; democratic participation in culture and social cohesion; European security), it has also a specific value in itself, as the only programme directly promoting culture as a public good and a right.

Recommendation no. 6: Ensure the involvement of civil society organisations and other relevant stakeholders in the preparation of EU funding programmes, in a transparent and accessible manner. Provide citizens and media with transparent information about fund beneficiaries and amounts spent.

The studies conducted by CSE on the involvement of CSOs in the preparation, implementation, and monitoring of RRF and NRRPs, concluded that the involvement of CSOs in the preparation phase was very limited, with poor quality consultations, lack of information on the processes and the content of the draft plans, and very short time frames to provide input. Moreover, the consultation of European platforms or networks of CSOs interviewed reported not having been consulted by the EC or other EU institutions (see Annex I). The EESC mid-term review on RRF implementation confirms this finding by saying that over half of the respondents judged the level of CSOs participation in their plans, both planning and implementation, as inadequate (EESC, 2023).

In a nutshell, the involvement of CSOs and other relevant stakeholders in RRF and the national plans is a clear step back compared to cohesion policy funds to which the partnership principle and ECCP apply. This is why the engagement of stakeholders under cohesion policy funds should be taken as a model for the future, and not RRF, not only in relation to cohesion policy funds, but it should be extended as much as possible to other funding programmes, whenever relevant. To make the engagement of CSOs and other actors effective in the preparation phase of EU funding programmes, there should be an obligation to consult CSOs and relevant stakeholders in the funding programmes that affect their activities, coupled with an obligation to report on those processes. **The consultation of CSOs and relevant stakeholders should become a condition for disbursement of funds.**

Another issue largely reported about RRF and the national plans is the **lack of transparency and of publicly available information to citizens and the media** on the content of the plans, their decision-making processes, the final beneficiaries and the amounts spent. This was also underlined by CSE studies and the EESC mid-term review, which noted that the lack of access to detailed data about the implementation of the plans also hinders the identification of the causes of problems encountered during the implementation and eases corruption in the use of funds. The EESC mid-term review recommends that 'information should be centralised in a single unit/organisation that would be accountable for disseminating it through the media, the internet and targeted stakeholders. The website for each national plan should be an essential tool containing all the information' (EESC, 2023). It is generally recognised by CSOs that the EC portal [Cohesion Open Data Platform](https://ec.europa.eu/cohesion/open-data-platform/) represents a particularly valuable tool to

¹⁰ <https://europa.eu/eurobarometer/surveys/detail/3364>

improve transparency and access to information on EU funds compared to the EC website on RRF.

OECD and the European Ombudsman pointed out that unlike the main EU funding programmes, the regulation establishing the RRF does not impose comparable requirements on transparency. While all Member States are required to collect data on final beneficiaries of the funds, the Regulation does not require them to publish this information more widely, it is only made available to the Commission, upon request, for audit and control purposes. Similarly, Member States need to submit a summary of audits with each payment request, but they are not routinely shared on national websites nor submitted to the EU database created for this purpose. Consequently, OECD and the European Ombudsman highlighted that as the outcomes of national recovery plans affect all citizens, a whole-of-society approach is needed, whereby all stakeholders can scrutinise government decision making and the results of their policies and initiatives. In this regard, institutions could commit to involving citizens, civil society actors and academics, as well as the private sector and trade unions, not only when plans are designed and implemented, but also as spending comes under assessment (OECD and European Ombudsman, 2022).

Finally, there should also be **true representativeness of CSOs and relevant stakeholders in dialogue channels**. For example, the European Parliament has a working group on RRF whose meetings are not open to the public, while it should be the opposite.

Recommendation no.7: Make sure that civil society organisations are recognised as direct beneficiaries of EU funding programmes and set the conditions for their meaningful involvement in the implementation phase.

The insufficient involvement of CSOs and other relevant stakeholders by Member States in the preparation of RRF plans has also been acknowledged by the EC in its Annual Report of 10 October 2024 on the RRF implementation, where it called on Member States to improve their participation in the implementation phase. **The participation of CSOs should be ensured across the whole programme cycle of all EU funding instruments, and not just during consultations.** It is important that the authorities responsible for the management of funds allow space to stakeholders to identify implementation challenges and propose solutions. This is a general rule that should be applied to all managing authorities at **all governance levels**, at EU, national, regional and local levels.

The EESC mid-term review put forward this recommendation: ‘The European Commission and national governments should ensure compliance with the RRF Regulation as regards the involvement of social partners and civil society organisations in the implementation phase of the plans through formal, structured and ongoing consultation processes. During the consultation, civil society organisations’ proposals should be centralised and their positions should be published, detailing what has and has not been accepted by the relevant government. The tables containing the comments made by CSO should also include the names of the bodies that made them in order to make this exercise transparent. It should also be ensured that consultative bodies provide feedback and follow-up information on the steps taken’ (EESC, 2023).

CSOs do not have access to all EU funding programmes, often because regulations do not spell out which actors can be considered implementing beneficiaries or because CSOs are not explicitly mentioned among the eligible beneficiaries. This has been the case for RRF and the national plans, as well as for the Technical Support Instrument. The study carried out by Housing Europe well testifies the constraints linked with eligibility criteria under RRF and national plans. Despite ten Member States putting forward significant housing reforms, not all housing providers fulfilling a general interest mission (e.g. public, cooperative and social housing providers) were eligible for this funding in all Member States. As recommended by Housing Europe, **eligibility criteria should be as large as possible, avoiding favouring one type of provider/actor over another**, as this limits the ability of different actors to address complex needs effectively.

To ensure effective access to funding and participation in the implementation phase of all actors, including CSOs even of small size, it is crucial that responsible authorities provide mechanisms for strengthening their institutional capacity and simplify rules, and application and reporting processes. On this, view recommendations no. 9 and 10.

Recommendation no. 8: Ensure the involvement of civil society organisations in the oversight mechanisms to monitor and evaluate the performance of EU funding programmes.

ECA reported several pitfalls and shortcomings in the monitoring and control systems set up by Member States concerning NRRPs and highlighted that oversight mechanisms, including reporting systems, for RRF and NRRPs were a step back compared to the mechanisms that exist in cohesion policy (ECA, 2023).

First of all, there should be an **obligation for all EU funding instruments, both under direct and shared management, to set up a Monitoring Committee (MC)**, which was not the case for NRRPs. This was also a recommendation put forward by the EESC. The EESC mid-term review of RRF sets out that ‘unlike other EU programmes, there is no obligation to create monitoring committees or similar bodies. Even where such committees have been established, they meet too infrequently, serve mainly to present information and have minimal decision-making influence’ (EESC, 2023).

To give an example of a good practice from the current MFF that would be worth replicating in the next period, the MCs should be informed of reports of cases of non-compliance with the Charter of Fundamental Rights of the EU of activities supported by the EU programmes in question. Additionally, the MCs approve the final performance reports for ESF+ and the annual performance reports related to Home Affairs funds. These reports also cover the fulfilment of the enabling conditions related to the Charter of Fundamental Rights, which provides the possibility for MC members to potentially provide feedback or input on compliance with fundamental rights (PICUM and ECRE, 2023).

In MCs of shared management funds, there should be full representation of the EC, which is not the case now. Both in programmes under direct and shared management, representation of all relevant stakeholders, including CSOs, should be ensured. At least two thirds of CSO representatives in MCs should be independent of the government. In case of a centralised fund covering multiple policy areas such as RRF, lead Ministries or authorities – which are generally

Ministries for Finance or Economic Policies - should involve other relevant Ministries in Monitoring Committees. All stakeholders participating in MCs should have equal voting rights. The relevant authorities should also consider compensating the representatives of CSOs with limited financial capacity, for their participation in MCs. These measures are important to ensure that all stakeholders participate in MCs on equal footing.

The role of the European Parliament should also be strengthened in the monitoring of EU funding programmes, in cooperation with CSOs and other relevant stakeholders. In particular, the European Parliament and its Budget Committee should organise annual hearings on the implementation of EU funding programmes, with the involvement of EC, Member States representatives, EESC and CoR, LRAs, CSOs and social partners, to discuss positive aspects of implementation, shortcomings and possible solutions. Institutions and stakeholders should also be heard through the Committee on Petitions.

Annual implementation reports of EU funding programmes should contain specific indicators for CSO involvement. Indicators and methodologies for monitoring and evaluating EU funding programmes should be established in cooperation with CSOs and all relevant stakeholders. Annual implementation reports should be fully discussed with stakeholders in MCs, published online and made available for comments.

Recommendation no. 9: For all EU funding instruments, ensure that adequate technical assistance for the administrative capacity of the authorities responsible for the implementation of EU funding programmes and capacity building of stakeholders, including CSOs, is available.

Good quality technical assistance is essential to foster the administrative capacity of the authorities responsible for the implementation of EU funding programmes, as well as the capacity building of all stakeholders, including CSOs, even of small size and/or those representing the most vulnerable groups in society, to compensate lack of skills, resources, confidence or adequate time. The EESC mid-term review found that 'One of the barriers to the effective inclusion of civil society organisations is their weak capacity, i.e. a lack of specialised staff and resources to monitor programme implementation' (EESC, 2023).

Improving the skills to work in partnership with different actors, including CSOs, can be a need also for responsible ministries and/or managing authorities. This can be overcome by providing partnership skills training, exchange of good and not-so-good practices and tools, and peer reviews on CSO engagement among different Directorates General (DGs) of the EC, Member States and managing authorities. Learning from stakeholder engagement successes and failures through training and peer reviews should strategically feed in the improvement of future developments. A mutual learning process could be established also inside the EC, as for example DG EMPL and DG REGIO have much more consolidated practices and structures than other DGs when it comes to CSO involvement and structured dialogue with CSOs.

Another important aspect of meaningful stakeholder engagement is the **investment in adequate stakeholder engagement infrastructure**, in terms of structures, processes and resources. Where stakeholder engagement / consultation frameworks exist, it is important to use them and readapt them, when necessary, to new funding instruments, instead of creating new ones. Where they do not exist, it is necessary to develop them. Member States could for

example request support under the Technical Support Instrument to structure stakeholder / CSO involvement, where relevant.

A concrete example provided by Housing Europe concerning RRF is that some central or regional governments offered assistance in complying with the Do No Significant Harm (DNSH) principle in some countries, and there was no available assistance in others (Housing Europe, 2025).

Annual implementation reports of EU funding instruments should also contain a section giving account of the technical assistance and capacity building initiatives put in place to strengthen the institutional capacity of authorities and stakeholders.

Strengthening the institutional capacity of CSOs includes providing **adequate funding to CSOs to operate at EU and national levels**. CSOs play a critical role in ensuring representativity, by voicing the concerns of diverse communities and interest groups across the EU; accountability, by monitoring institutions and holding them to democratic standards; effectiveness, by helping shape policies that are responsive to real-world needs; and expertise, by contributing specialised knowledge and grassroots experience that public authorities may lack. Operating grants are one of the key instruments through which the EU enables civil society to contribute to and uphold these democratic values. It is important to **keep operating grants for CSOs in the next programming period** (see CSE paper '[Common civil society requests for Operating Grants](#)'). The EC should also recommend Member States to provide adequate funding to ensure a structured, transparent and continuous dialogue with CSOs at national level, including on EU policies and funding instruments.

Lastly, the following are **recommendations addressed to CSOs to make their involvement more impactful**. CSOs should invest time in cooperation, learning and joint action in Platforms, Networks and Federations and across sectors, channeling their contributions in a more efficient way (by highlighting in individual contributions only areas of specific expertise or disagreement). They should be prepared with analyses, ideas and proposals to be able to give input to consultation processes in a timely and effective manner and develop a portfolio of reforms and projects to be ready with content for consultations in short time frames. They should also be prepared to move from their 'comfort zone' and ensure their issues are mainstreamed in all areas. For example, the pillars of RRF devoted to the twin transitions have been a good opportunity for CSOs to contribute and engage in topics that are at the crossroads of different policy areas.

In advocacy activities on the next EU Budget, it will be very important for CSOs not to limit their advocacy activities to the DGs and the Ministries responsible for the policies in which they are active (e.g. DG REGIO, DG EMPL and DG ENV and related Ministries at national level), but to prioritise the targeting of the EC Sec Gen, DG REFORM and DG BUDGET, Members of the European Parliament working on economic affairs and budgetary policies, the EESC and CoR, and Ministries of Finance and Economic Affairs at national level.

Recommendation no. 10: Simplify eligibility criteria, rules, application and reporting processes for final beneficiaries of EU funding instruments.

The EC in its Communication on the road to the next MFF made explicit intention to simplify the landscape of EU funding programmes, by reducing their number and simplifying their rules, eligibility criteria, application and reporting systems and multiple entry points for application. The EC also highlighted how different rules for the different funding programmes create unnecessary complexity for SMEs to access funding. CSOs also testify that red tape and bureaucratic requirements undermine the effective and efficient implementation of funds on the ground. Therefore, a simplification effort from the EC in that regard is welcome.

To ensure simplification, CSE recommends:

- maintaining the single rulebook of the funds of the Common Provisions Regulation and extend it to as many funds/programmes as possible
- enhancing a strict single audit approach to reduce the administrative burden
- making application forms and reporting processes more uniform across different EU funding programmes
- enlarging eligibility criteria as much as possible, namely with reference to CSOs participation as direct beneficiaries, and make them more uniform across different EU funding instruments, unless justified by specific reasons
- avoiding asking beneficiaries for the same type of information and documentation during application processes
- maintaining simplified cost options (ECA finds that SCOs can reduce the burden of documenting expenditure actually incurred and are less prone to unintentional errors – ECA, 2025d)
- reducing co-financing requirements for CSOs and SMEs compared to other types of beneficiaries (for example, by taking account of size and financial turnover).

As highlighted by ECA, the EC considers that the next EU budget should place greater focus on performance, and that the delivery model of financing not linked to costs improves the performance of EU spending. The main instrument under this model is the RRF. However, ECA audits revealed weaknesses regarding its design, implementation and effectiveness, as well as accountability (ECA, 2023). CSE agrees with ECA's recommendations that if it is not possible to clearly link funding to results, the 'financing not linked to costs' system should not be applied (ECA, 2025c).

In conclusion, CSE supports ECA's statement that simplification must not come at the expense of accountability and performance (ECA, 2025d).

Annex I – key findings from Civil Society Europe’s studies on the involvement of civil society in the Recovery and Resilience Facility and its national plans

RRF was established in February 2021 by Regulation (EU) 2021/241 of the European Parliament and the Council of the European Union. Its aim is to mitigate the economic and social impact of the coronavirus pandemic and make European economies and societies more sustainable, resilient and better prepared for the challenges and opportunities of the green and digital transitions. In May 2022, the European Commission (EC) presented REPowerEU plan¹¹ aimed at rapidly reducing the EU dependency on Russian fossil fuels. This plan has three main objectives: a) produce energy savings; b) diversify supplies; and c) quickly substitute fossil fuels by accelerating Europe’s clean energy transition. REPowerEU is mainly funded by RRF, complemented by the Innovation Fund and the amounts deriving from the sale of Emissions Trading System (ETS) allowances.

The [first study](#) was carried out in November-December 2020, thus before the entry into force of the RRF Regulation, and focused on CSOs’ involvement in the preparation of the national plans. It covered 17 Member States (MS): BE, BG, CY, CZ, DE, ES, FR, HU, IT, LV, MT, NL, PO, PT, RO, SI, and SE. It was coupled with a [Guidance note](#) for CSOs on how to engage with national authorities during the preparation of the plans.

The [second study](#) was developed in August-September 2021 and had three aims: a) to carry out a final assessment of consultation mechanisms for the preparation of NRRPs from the perspective of CSOs as compared to the official presentation; b) to highlight the involvement of CSOs in the mechanisms for oversight of implementation and monitoring the plans; and c) to provide recommendations on ways to improve engagement of CSOs in the implementation and monitoring of the plans. Country fiches were produced regarding 11 Member States: BE, DK, EL, ES, FR, HU, IT, LT, PL, PT and RO. Some information was collected concerning the other 13 MS: AT, BG, CZ, DE, EE, HR, LU, LV, MT, SK, SI and SE.

From a methodological point of view, both studies have some limitations, because they were conducted in a very short time frame and with limited resources. As not all the sectors of CSOs gave an input concerning the plans of the countries analysed, the analysis of the content of the plans and the findings of these reports are based on the views expressed by the respondents and the interviewees, and should not be considered exhaustive and comprehensive.

Key findings and lessons learned from CSE studies

This Annex is aimed at highlighting in a comparative way the key findings and lessons learned from CSE’s previous two studies.

The key findings and lessons learned arising from the two studies are presented in light of the principles enshrined in the partnership principle and in the European Code of Conduct on Partnership (ECCP): representativeness, transparency and accessibility, ongoing involvement, strengthening institutional capacity, review and assessment, and mutual exchange and learning. Although the partnership principle and the ECCP do not apply to RRF, nonetheless we consider it useful to use them as a reference framework for our analysis.

¹¹ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU Plan, COM (2022) 230, 18.05.2022

Furthermore, the findings and recommendations arising from CSE studies have been analysed against the conclusions and recommendations of the RRF [mid-term review](#) conducted in 2023 by the European Economic and Social Committee (EESC).¹² Overall, the EESC findings and recommendations are very much aligned to those contained in the 2020 and 2021 CSE studies. An important conclusion from the EESC evaluation of the consultation process is that it has not changed with the introduction of the REPowerEU mechanism.¹³

Representativeness (art. 5 of CPR; arts. 2-4 ECCP):

<p><i>What it means and how it should be implemented:</i></p> <ul style="list-style-type: none"> • Ensure greater diversity in partner selection with indicative list and clearer procedures for including different partners. • Give fuller consideration of relevance, timing and ‘fit’ of diverse inputs in different contexts and Programme phases. • Carry out partner selection based on most appropriate partners for particular themes and focus areas. 	
<p><i>Key findings from first study:</i></p> <ul style="list-style-type: none"> • <u>Poor quality consultations:</u> in general, there has been little proactive Government led consultation or engagement of CSOs in the preparation of the NRRPs (with the exception of PT and to some extent IT¹⁴), even in countries where traditionally CSOs are consulted on key EU Plans and Funds (e.g. Germany).¹⁵ • <u>Limited involvement of Ministries other than lead Ministries:</u> in most countries even indirect consultation through the Social Affairs Ministries or Environmental Ministries was not achieved. Respondents in the social 	<p><i>Key findings from second study:</i></p> <ul style="list-style-type: none"> • Not all CSO sectors were involved or were involved to the same extent: environmental NGOs were more involved, social NGOs managed to influence the plans in some countries, NGOs representing youth were little involved despite the calls of the European Commission, and cultural NGOs seem to be the ones which had the least influence. • Social partners were more and better consulted than CSOs. • All 11 NRRPs analysed have a section on consultations, except for IT, but very few give account of how CSO contributions were used.¹⁷

¹² EESC, Mid-term evaluation of the Recovery and Resilience Facility, ECO/607, and its technical annex.

¹³ The EESC mid-term review points out that ‘Half of the respondents do not know if national public authorities improved the involvement of social partners and civil society organisations in the design of the additional REPowerEU chapter for the RRP compared to the initial process. The remainder are divided between believing that they improved it at least to some extent (28%) and believing that they did not improve it at all (24%).’ (p. 7).

¹⁴ The EESC mid-term review confirms this finding by saying that Italian stakeholders expressed a relatively positive view on how civil society involvement had developed, but some pointed out that, following the abolition of the Permanent Partnership Roundtable (*Tavolo permanente per il partenariato economico, sociale e territoriale*) by the new Italian government, the future was uncertain in this regard (p.7).

¹⁵ The EESC mid-term review reports that most of the participants from Germany, Latvia, Romania and Portugal voiced negative views and shared concerns over a perceived lack of genuine engagement and reluctance to incorporate stakeholder suggestions into the plans (p. 7).

¹⁷ The EESC mid-term review argues that ‘even when consultations were held, they were sometimes seen as a superficial process, with comments from civil society not taken into account and often with no feedback. The perceived impact of organisations on their country’s RRP varied, with German and Romanian respondents feeling a minimal impact’ (p. 7).

<p>sector from Spain, Lithuania, Poland argue that Employment and Social Affairs Ministries were invited to make contributions at a very late stage and struggled to meet deadlines.</p> <ul style="list-style-type: none"> • <u>Importance of regional & local levels:</u> the involvement of regional and local levels varied a lot across MS. In IT, the regional level played an important role, and in ES, only in the second stage. DE, which usually has a strong regional approach, developed the plan at federal level.¹⁶ • <u>Almost lacking consultation at EU level:</u> no one from the European Platforms or Networks of NGOs interviewed reported having been proactively consulted by the European Commission or other EU institutions in relation to the development of the RRF. 	<ul style="list-style-type: none"> • In some countries, sectoral consultations were organised by different Ministries (ES, HU, IT, LT, PL, and PT).
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Transparency and accessibility (arts. 5-9 ECCP):

<p><i>What it means and how it should be implemented:</i></p> <ul style="list-style-type: none"> • Provide documents in plain and understandable language. • Give guidance around timeframes (minimum 10 days), expectations and opportunities for partner input. • Demonstrate clear consideration of diverse views and why particular decision/s or action/s are taken or not. • Define rules on how partners participating in Monitoring Committees can work better together. 	
<p><i>Key findings from first study:</i></p> <ul style="list-style-type: none"> • Most respondents expressed the view that consultations were non-transparent and too limited. • <u>Uncertain procedures:</u> rules for consultation processes were very unclear, with no or very little or opaque information on consultation processes (which authority, if CSOs 	<p><i>Key findings from second study:</i></p> <ul style="list-style-type: none"> • Most CSOs that were involved in consultations were of the view that they were mainly a tick box exercise instead of meaningful consultations, with little information shared before the meetings or requests to provide inputs or comments on prepared

¹⁶ The EESC mid-term review reports the strong criticism by German Landers of their limited and late involvement in the preparation of the plans. The same report highlights that this situation seems to have been redressed in the implementation and monitoring phases, as the governance structure provides for regular coordination meetings between the Länder and the federal line ministries responsible for reforms and investments that directly influence the obligations of the Länder; at the request of the Länder. The Länder should also be closely involved, in a timely manner, in reporting on the progress of implementation.

<p>could participate, on links with ESIF, European Semester and REACT-EU).</p> <ul style="list-style-type: none"> • <u>Late stage consultations</u>: a number of countries indicated their intention to consult civil society at a later stage in the adoption process of plans, leaving little possibilities to influence substantial changes. 	<p>drafts and with little time at their disposal.¹⁸</p> <ul style="list-style-type: none"> • Practices & principles deriving from the ECCP¹⁹, such as early involvement, timely sharing of information, representativeness and transparency, were not reflected in consultations. • Only HU, LT, PL and PT plans provide information on the impact of the consultations on the development of the plans.
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Ongoing involvement of partners (arts. 10-16 ECCP):

<p><i>What it means and how it should be implemented:</i></p> <ul style="list-style-type: none"> • Pursue more active forms of participation. • Give special attention to partner engagement during Programme implementation. • Make concerted efforts to integrate local voices in Programme cycles through place-based, bottom-up and participative approaches. 	
<p><i>Key findings from first study:</i></p> <ul style="list-style-type: none"> • <u>Disappointment or lack of knowledge of content of plans</u>: CSOs expressed concern that important insights and proposals for the content of the plans being developed, will be missed, due to too little involvement of CSOs. • <u>Uncertain status of CSO as partners and beneficiaries of funds</u>: The Commission's proposal for Regulation did not spell out which actors can be considered implementing beneficiaries of the funds during the implementation of the Plans. Concerns were expressed about the possibility for CSOs to receive part of the funds. • <u>Proactive CSO engagement</u>: Where CSOs have been proactive in seeking to engage with the NRRPs and have suggested reforms or projects that 	<p><i>Key findings from second study:</i></p> <ul style="list-style-type: none"> • In most Plans, CSO involvement in implementation is not specified or very vague. Exception is BE. • However, BE, EL, ES, FR and IT Plans foresee specific measures addressed to CSOs, but implementation mechanisms still have to be defined.²⁰ • CSO respondents from some countries see their proposals and input reflected in the Plans.

¹⁸ The EESC mid-term review stressed 'the lack of timely, consistent and transparent communication with the public authorities, and the lack of access to information on the current implementation of plans and ongoing projects that have not yet been fully implemented. There is inequality in access to information, depending on the capacity of the potential beneficiaries. This is also linked to a lack of administrative capacity on the part of stakeholders.' (p. 2).

¹⁹ The EESC mid-term review goes even further and calls for a revision of the 2014 EU Code of Conduct on Partnership (p. 10). The European Community of Practice on Partnership (ECoPP) established by DG REGIO also calls for a review of the ECCP.

²⁰ The EESC mid-term review confirms this finding by saying that over half of the respondents judged the level of CSOs participation in their plans, both planning and implementation, as inadequate (p. 10).

could be supported by them, this has had some positive impact in developing engagement with the Ministries responsible (e.g. Latvia and Poland).

Strengthening institutional capacity of partners (arts. 17 ECCP):

What it means and how it should be implemented:

- Dedicate time and resources to reinforcement of capacity building of partners.
- Use of Technical Assistance to both support partners unable to contribute effectively due to lack of resources, skills, confidence or adequate time, and to provide all stakeholders with training on how to work in partnership.

Key findings from first study:

- Failure to use existing consultation structures: in general, consultation structures in place for European Structural and Investment Funds and for the European Semester were not used to consult on NRRPs (except for BG and IT).

Key findings from second study:

- Civil dialogue channels developed around the EU Semester and ESIF were in general not used to consult CSOs on the preparation of the plans.²¹
- In BE, FR, EL, PL and PT CSOs were mainly consulted through existing consultative bodies.

Review and assessment (arts. 10-16 ECCP):

What it means and how it should be implemented:

- When formulating the rules of membership of the Monitoring Committee, Member States shall take into account the involvement of partners that have been involved in the preparation of the programmes and promote gender equality and diversity.
- Member States shall establish the rules of procedures of Monitoring Committees as specified in art. 11 ECCP.
- Member States shall take appropriate measures to avoid conflict of interest when involving partners in the preparation of calls for proposals or in their assessment.
- Member States shall involve relevant partners in the preparation of progress reports of Partnership Agreements, in the monitoring and evaluation of programmes.

Key findings from first study:

This topic was not covered in the first study.

Key findings from second study:

- Only FR, PL, PT and RO Plans explicitly foresee CSO representatives in Monitoring Committees.²²

Mutual exchange and learning (arts. 17 ECCP):

What it means and how it should be implemented:

²¹ The EESC mid-term review provides that 'There is a notable absence of a robust institutional framework for conducting consultations and involving civil society in NRRPs development and implementation' (p. 7).

²² The EESC mid-term review sets out that 'unlike other EU programmes, there is no obligation to create monitoring committees or similar bodies. Even where such committees have been established, they meet too infrequently, serve mainly to present information and have minimal decision-making influence' (p. 7).

- For ESIF, the European Commission shall set up a cooperation mechanism (the European Community of Practice on Partnership - ECoPP), to facilitate exchange of experience, capacity building and dissemination of good practices.

Although the ECoPP is not applicable to RRF, the principle of mutual exchange and learning is valid for any funding programme, and especially for RRF, which is a new one and with different features than cohesion policy funds.

Key findings from first study:

This topic was not covered in the first study.

Key findings from second study:

- CSO sectoral & cross-sectoral alliances were more successful in getting their voice heard than individual NGOs not belonging to any networks or alliances.

Annex II – Distinctive benefits of working in partnership

<i>Distinctive benefits of working in partnership</i>
<p>Multi-level governance: partnership is understood as a multi-level form of governance in which decision-making responsibilities are shared between the EU, Member States, and regional and local authorities, alongside stakeholders such as social partners, civil society actors and citizens themselves.</p>
<p>Stakeholder involvement: by associating stakeholders - including civil society organisations, social partners and citizens' groups - in decision-making processes, partnerships contribute to transparency, and promote democracy and policy coherence through alignment of objectives between different levels of governance.</p>
<p>Focus: by harnessing the perspectives and resources of different societal actors, the gaps, needs and priorities relating to EU development, and the challenges are more clearly identified, and approaches that better incorporate the perspectives of end users and target groups are created to address them.</p>
<p>Coordination: working in partnership can improve and synchronise policy coordination and the targeting and adaptation of programmes and projects to local conditions so that reach is improved and duplication avoided.</p>
<p>Access to resources: a range of diverse contributions can be obtained from different stakeholders to address particular problems and challenges, and to develop more creative and dynamic approaches to societal challenges.</p>
<p>Social capital: connections and relationships across different countries, regions, sectors and organisations can reinforce social networks while also promoting a deeper shared understanding of the value and importance of other sectors and their role in society.</p>
<p>Innovation: more creative, new and dynamic approaches to societal challenges are engendered by sharing diverse perspectives, ideas and resources.</p>
<p>Capacity building and institutional strengthening: working in partnership with different actors can also enhance the opportunities for building and improving strategic and operative capacity in order to overcome resource/size/skills limitations.</p>
<p>Empowerment: improved capacity and direct engagement with target groups should enable those who are disadvantaged or marginalised to have a stronger voice in the political arena and take a more proactive role in addressing issues that affect them.</p>
<p>Legitimacy: wider stakeholder mobilisation can give a more democratic policy mandate as the involvement and support of organisations that are 'trusted' by society can increase public acceptance of necessary reforms while encouraging more responsive policy approaches to problem-solving.</p>

Stability and social cohesion: the inclusion of civil society concerns in strategic planning exercises, stimulation of corporate involvement in local projects and greater satisfaction with public policy can contribute to a more integrated and cohesive society.

Sustainability: by promoting societal engagement, joint ownership and mutual benefit, working in collaboration can promote long-term, durable and positive change that addresses social and societal problems in an accountable way and integrates learning within, between and across different actors in society.

Knowledge exchange and learning processes: successful partnership is a constant learning process in which the parties walk a path together based on common interests and different perspectives, all on the basis of the values of diversity, collaboration and mutual trust.

Source: Own elaboration based on the following studies: European Commission (2019), Guidebook. How ESF Managing Authorities and Intermediate Bodies support partnership; European Commission (2018), Review of the European Code of Conduct on Partnership (ECCP), Technical dossier no. 7; Leda Stott and Mihael Topolovec (2019), Beyond the ESF: partnership in other EU funds and programmes, Thematic Network on Partnership.

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