

## Civil Society amendment position paper on AgoraEU

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Civil Society Europe has coordinated a broad coalition of civil society organisations and actors of the cultural and journalistic sectors for the following position paper on AgoraEU. This document has been prepared together with 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 Culture Action Europe, European Civic Forum, European Federation of Journalists, International Planned Parenthood Federation European Network, European Gender Budgeting Network, and ILGA-Europe.

### General remarks on the programme

We welcome the initial financial envelope proposed for AgoraEU as an important political indicator that culture, media freedom and democratic participation are recognised as core components of Europe's social and democratic infrastructure.

However, we observe that the needs across all three sectors continue to grow faster than available resources. Structural funding gaps have emerged across culture, independent media and civil society following the retrenchment of major international funders, including significant reductions in support by actors such as USAID and large philanthropic foundations, a trend further intensified by successive global crises. In parallel, authoritarian actors have substantially increased their investment in information influence and narrative control. Russia alone reportedly spent approximately €1.42 billion on media and information activities in 2021, and more than €1 billion on propaganda through media and culture in 2024. At the same time, China has moved rapidly to expand its footprint through strategic investments, influence operations and the systematic suppression of independent monitoring and scrutiny, in order to advance its geopolitical interests.

While the baseline funding proposed for AgoraEU is ambitious, it does not fully match the scale of the challenges the programme is expected to address. Moreover, private funding streams in key areas continue to face structural pressure. In journalism, commercial revenues and consumer contributions have weakened to an unprecedented level. In parts of the cultural and creative sectors, private revenues and sponsorship have recovered unevenly since the COVID-19 shock, with particularly slow and fragile recovery in live performance, community-based cultural organisations and smaller local operators, and with significant disparities across Member States and regions. In the civil society sector, private philanthropic funding remains uneven across the Union and cannot substitute for stable, predictable public funding. Taken together, these trends underline the increased need for robust EU-level support alongside national efforts.

Therefore, we support the different proposals by the European Parliament to increase the budget for AgoraEU, including the most ambitious proposal by the CULT Committee, which would raise it up to €12 billion in 2025 prices. In addition to the proposed financial envelope, we suggest that the AgoraEU programme also benefit from a programme-specific adjustment mechanism. We propose that revenues from fines imposed under the Digital Services Act, Digital Markets Act, and AI Act be made available as an additional allocation of commitment and payment appropriations to AgoraEU. This would follow the precedent of the programme-specific adjustment established under the 2021–2027 MFF. Such an approach would help address the significant risks and negative effects that digital market dominance poses to culture, media, democracy, and fundamental rights, including job losses, market distortion, and the spread of foreign information manipulation and interference.

We support the reallocation of funds into AgoraEU in cases of breaches of the rule of law or the Charter of Fundamental Rights under the horizontal conditionality mechanism. This would contribute to ensuring that civil society continues to be supported in difficult contexts.

The AgoraEU programme allows synergies between different sectors of culture, media and civil society. However, in terms of institutional capacity, there is a widely diversified environment across the sectors. That is why we strongly support the presence of clear earmarking for the different strands of the programme, as it ensures that sectors are not forced to compete with one another for the annual allocation of funding.

We regret the lack of clarity for what regards the cross-sectoral actions and their financing. In this sense, both single-strand and cross-strand actions must be adequately funded, and the focus of cross-sectoral actions should reflect the proportion of funding contributed by the respective strands. Furthermore, we support a clear and stable funding line for the AgoraEU national desks, which should build on the currently existing desks for Creative Europe and CERV while ensuring their independence from national governments.

We call for the reinstatement of the Civil Dialogue Group to design and evaluate the work programmes. Involving civil society and grantees in strategic reflection on the programmes is crucial for maximising their impact and implementing Article 11 TEU, which establishes the principle of a structured dialogue between institutions and civil society organisations.

We call for the integration of gender equality promotion into the programme objectives (Article 3). We also call for earmarking a minimum level of funding to support equality, gender equality and combat gender-based violence.

The streamlining of the re-granting mechanism to the whole AgoraEU programme is an encouraging sign, as it would also allow grassroots organisations to benefit from the programme with established cultural and civil society organisations acting as intermediaries.

Finally, while we understand the need to have more flexibility in the programmes, funding stability and predictability are crucial for beneficiaries: we propose the addition of an annex with a non-exhaustive list of activities to be funded under the AgoraEU programme, which would provide political prioritisation, clarity and long-term predictability to the activities supported by the programme.

### **The Creative Europe - Culture strand**

The cultural sector reiterates the importance of a strong, earmarked financial allocation to the Creative Europe - Culture strand. This funding should complement funding opportunities for culture across other proposed funding programmes, including the European Competitiveness Fund, Horizon Europe, the Global Europe Instrument, National and Regional Partnership Plans, and the European Social Fund.

We affirm the importance of introducing a clear annex outlining concrete funding lines. This should explicitly preserve funding for cooperation projects, networks, platforms (cascading grants), artist mobility (Culture Moves Europe), the European Capitals of Culture, the European Heritage Label, EU cultural prizes, and European cultural entities. In addition, the annex should ensure a strong sectoral approach, building upon the foundations of the 2021-2027 Creative Europe programme. All major cultural sectors should be represented; alongside music, book publishing, architecture and heritage (as currently reflected in Creative Europe), we propose dedicated sector-specific actions for the visual arts, performing arts, design and crafts.

We are concerned by the split between the “cultural and creative sectors” and the “media industries” introduced in the Presidency compromise text on the AgoraEU Regulation (12 January 2026). This

drafting effectively removes the audiovisual sector (film, television, video games, etc.) from the cultural and creative sectors and reclassifies it only as “media industries”. This sets a risky precedent: it diminishes the audiovisual sector’s artistic and cultural character and frames it primarily through a commercial and democratic-media lens, which is difficult to reconcile with Europe’s cultural model. The definition of “media industries” also creates ambiguity by referring to “theatrical exhibition, television and radio broadcasting, print and online publishing”, which overlap with areas well-established under the cultural and creative sectors (performing arts, book and publishing). For these reasons, it is proposed to keep the audiovisual sector within the definition of the cultural and creative sectors, while making clear that it is supported through a dedicated objective under the MEDIA+ strand, in line with the approach of the current Creative Europe framework.

The cultural sector also calls for meaningful social conditionality for beneficiaries. Article 4 mentions the improvement of working conditions as a principle of funding, thus its beneficiaries should be required to commit to the upcoming EU Artists Charter and to comply with fair pay, fair labour relations, and fair social security principles. Moreover, establishing a dedicated funding scheme in AgoraEU to protect artistic freedom and support artists at risk, similar to the Media Freedom Rapid Response, would provide invaluable support for artists and creatives at risk.

Lastly, we stress the importance of retaining and building upon the identity and visibility of the Creative Europe brand. We propose that all Culture strand beneficiaries are required to use a dedicated strand logo in their communications and promotional materials.

### **The “MEDIA+” strand**

The MEDIA+ strand is a meaningful political and financial signal: for the first time, the EU’s previously fragmented support for news media, media pluralism and counter-disinformation is brought under a clearer “News” objective inside MEDIA+. That said, independent journalism remains structurally under-supported. Local and regional outlets are disproportionately affected, and European news organisations face a growing investment gap in digital infrastructure and innovation compared to global platforms. These developments directly affect democratic resilience and the Union’s capacity to counter FIMI and other hybrid threats.

EU action needs to go beyond short-term, project-by-project interventions towards sustainable support models, including core funding for local and independent outlets, and stronger capacity-building for journalists and their organisations.

While the Commission’s baseline is ambitious, it may still fall short of the scale of the challenges AgoraEU is expected to address. We support the European Parliament’s call for a reinforcement of the overall AgoraEU envelope and also call for closer cooperation with the European Competitiveness Fund to foster innovation for the media industry under the Digital Leadership window.

We recommend creating multi-year funding windows including 3–5 year core grants for independent non-profit, investigative, local and community journalism, and support for freelancers and underserved audiences.

In order to ensure that funding is predictable and traceable, we also call for the AgoraEU programme to require a published annual allocation breakdown (methodology, geography, impact indicators) to make internal balances trackable by Parliament and civil society. As stated above, we call for relevant stakeholders to design and evaluate the work programmes.

Article 10 of the Commission’s proposal explicitly positions cross-cutting actions to support cross-sectoral cooperation, responsible use of AI and skills, and development, implementation and monitoring of relevant EU legislation and policy in the culture, media and civic fields. Funding must

help make EMFA, DSA, DMA, AI Act and anti-SLAPP safeguards through capacity-building, legal training, monitoring, and support mechanisms.

### **The “CERV+” strand**

EU support for civil society under the current CERV programme has enabled important progress in promoting and protecting fundamental rights, equality, citizen participation and the safeguarding of the rule of law, combating gender-based violence and all forms of discrimination. However, CERV calls are systematically oversubscribed, with a large share of eligible, high-quality proposals left unfunded due to budgetary constraints. In a 2024 survey by the European Union Fundamental Rights Agency, 85% of civil society organisations working on fundamental rights declared fearing that funding shortages threaten their work, a 10 point increase compared to the previous year. This shows a trend that we expect to continue and be exacerbated in the coming years. At the same time, civil society actors are increasingly called upon to contribute to core EU objectives and policies. In a context of shrinking civic space, civil society actors are increasingly stepping up to safeguard the rule of law, implementing fundamental rights, enabling citizens’ participation, and promoting equality and non-discrimination. The proposed CERV+ strand represents a meaningful reinforcement of EU commitment in this area, yet demand trends indicate that additional resources will be required to ensure broad territorial reach, accessibility for smaller organisations and sustained impact on the ground, as well as the implementation of the Strategy for Civil Society.

For this reason, we strongly support the Commission’s proposal for the AgoraEU programme and budget earmarked for CERV+ strand as minimum baseline. Additionally, we call to introduce a 85% earmarking for civil society in the strand.

We support the idea that the CERV+ strand cover all the activities of the current CERV programme, as well as new actions under the Civil Society Strategy. We therefore support the clear reintroduction of all the activities under the current CERV programme in the text of the regulation.

CERV+ shall continue to award operating grants to civil society organisations, and those operating grants must be specifically mentioned in the Regulation. Unrestricted core, sustainable, long-term funding is rare but essential to the functioning of civil society organisations, allowing them to work strategically, independently, with greater flexibility and adaptability, and to maximise their impact.

It is crucial for democracy that CERV+ continues to support CSOs’ advocacy watchdog activities, policy engagement, participation in EU policymaking and campaigning as eligible activities, in line with the Civil Society Strategy.

Additionally, to ensure an ambitious implementation of the Civil Society Strategy, CERV+ should support the creation of a protection ecosystem to support civil society and human rights defenders under attack, also by enabling strategic litigation, legal advice and support. The Regulation should also mention the creation of an EU mechanism for human rights defenders and civil society actors at risk capable of rapidly disbursing funding to access protection services.

CERV+ should continue to be managed under direct management, which is essential to guarantee that EU resources are distributed transparently and without political interference. It allows grassroots and smaller organisations, often excluded at the national level, to access funding on equal terms and to remain independent in their defence of rights and democracy. Crucially, direct management shields the Programme from shifts caused by national political changes, ensuring continuity of support for those protecting Union values on the ground.

CERV+ should continue the regranting scheme (“financial support to third parties”), which facilitates access to EU funding for organisations at the national and local levels through EU-level intermediaries.



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The scheme therefore enables the EU to reach and support smaller organisations at the national and local level, which is critical, given the increasingly difficult contexts in which they operate.