

Democracy Shield - Civil Society Priorities for Its Implementation

August 2026

1. Introduction

Civil Society Europe (CSE) is the coordination of European networks of civil society organisations: the variety of sectors in its membership is proof of the vital role civil society plays to support the democratic fabric of European societies, from the local to the EU level.

Democracy has always been at the core of CSE's work: from ensuring civil society participation in the [Conference on the Future of Europe](#), to contributing to the subsequent democracy initiatives of the Commission, from the European Democracy Action Plan, to the [Defence of Democracy Package](#), to the latest [Democracy Shield](#). While the narrative of the Commission's proposals have gradually tilted towards a more 'defensive' posture against external interference, civil society's position on the topic has remained consistent: democracy is an ecosystem made of functioning institutions, protected fundamental freedoms, respected civil society in the variety of its manifestations, and engaged citizenry, in a system of checks and balances that builds institutional trust in a system where a due policy making process delivers on the needs of the people. Democracy is an ecosystem whose parts need to be nurtured every day, and is exposed to risks that transcend national and EU-borders from FIMI to transnational repression, to national oligarchies and authoritarian practices. An integrated approach is therefore needed.

This paper aims at proposing pathways of implementation for the different initiatives under the Democracy Shield, in order to embrace the multifaceted nature of democracy protection and promotion and the role civil society can play in it.

2. The European Centre for Democratic Resilience - Turning a Title Into Reality

A flagship element of the Democracy Shield is the European Centre for Democratic Resilience, which is supposed to be a coordination point for institutions and Member States in sharing best practices, providing training and capacity building, and developing joint approaches, practices and methodologies. From the first months of the Centre's operations, it looks like a platform for Member States for peer learning of each other's practices to detect and combat foreign information manipulation and interference (FIMI) and disinformation. The European Parliament in its draft report proposes to establish it via a legal act to make it a permanent, autonomous EU structure, with a fully fledged operational capacity in detecting and acting against FIMI, especially in the context of elections, as well as to safeguard democratic processes at the EU level.

Civil Society Europe supports the goal of a strong European Centre for Democratic Resilience, which functions as a focal coordination point for the different aspects of the Democracy Shield: CSE underlines how democratic resilience cannot be based only on combatting FIMI, as information manipulation and interference attempts do not come only from outside of the EU, but can also be 'domestically sourced'. Disinformation and information manipulation, furthermore, is not limited to domestic politics of Member States, but it can also reach the EU level and influence the discussion around EU legislation and policies. Similarly, the resilience

of electoral processes rests on the consensus on the procedural fairness of the elections and in their results - disruption on such consensus can come both from foreign or domestic sources. Therefore, the Centre should develop an approach of countering disinformation, information manipulation and interference and disruption of electoral processes based on transparency, support of independent institutions, fact-checking, and institutional and civic electoral resilience.

In this context, the Stakeholder Platform will be crucial to ensure the added value of the Centre and its coordinating role for the different dimensions of the Shield: in order to do so, the Centre should take inspiration from the [Polish Council for Resilience](#) and integrate a variety of stakeholders in the platform, including organisations combatting disinformation, working on democratic resilience, monitoring civic space, and representing a variety of groups, including marginalised communities, in order to ensure a 'whole of society' approach to democratic resilience. The Stakeholder Platform should be structurally integrated in the decision making of the Centre. It should have a policy input role on the items that will be discussed during the Centre's meetings, an advisory role on the decisions of the Centre, and its representatives should participate in the meetings with the Member States, while respecting the regime of confidentiality of some of the information shared in that context.

3. Safeguarding the Integrity of the Information Space - The Complementary Role of Civil Society

The Commission's proposal for the Democracy Shield and the European Parliament draft report underline the importance of the implementation of the European Media Freedom Act (EMFA), the Digital Markets Act (DMA), the Digital Services Act (DSA), as well as the AI Act; they stress the importance of media pluralism, public service media, safety of journalists and of a European critical digital infrastructure, including digital sovereignty. Further measures include the establishment of a European Network of Fact-Checkers, common guidelines for national media regulators on how to protect the EU information space from rogue non-EU media services, and a common research support framework to strengthen monitoring of information manipulation and disinformation campaigns.

Civil Society Europe supports the thorough implementation and concrete application of the DSA, DMA, AI Act and EMFA, and warns against any attempts at deregulation via the omnibus legislation that would weaken the EU's safeguards against foreign digital dependencies and all forms of manipulation of democracy via digital platforms. CSE supports the efforts at reducing digital dependencies, such as the Tech Sovereignty package: it underlines that the development of EU-based technologies must reflect EU values, including a 'democracy-by-design' structural approach on governance and ownership, high standards of fairness, transparency, explainability, safety, and security of technology, as well as data privacy standards.

Furthermore, civil society can play an important role in safeguarding the integrity of the information space, as in many countries NGOs perform the function of media outlets and operators: it is crucial to support local media organisations, investigative journalism, strengthen anti-SLAPP policies and develop a protection scheme for journalists at risk.

4. The Institutional Aspect of Democracy - Protecting a Critical Infrastructure

The Democracy Shield recognises the electoral infrastructure as a critical element to protect against manipulation and interference. To this end, particular importance is given to the European cooperation network on elections (ECNE): the European Parliament proposes a further reinforcement of the network, and an involvement of the European Parliament and of the Authority for European Political Parties and European Political Foundations in all ECNE meetings.

Civil Society Europe supports the strengthening of ECNE, on a pathway towards its transformation into a fully-fledged EU agency, called European Electoral Authority. In the meantime, CSE supports a reinforced ECNE as a coordinating body for the implementation of the [Commission recommendation on inclusive and resilient electoral processes in the Union](#), and pilot cross-country missions of election observation missions for national elections within the Member States, in coordination with the ODIHR.

Furthermore, ECNE should also be tasked with supporting Member States in removing barriers to democratic participation in elections. To this end, ECNE should develop a report on equality, inclusiveness, representativity and transparency of elections, covering accessibility of elections and political campaigns and debates for all marginalised groups, transparency of the financing of political parties and campaigns, as well as issuing guidelines for elections in emergency contexts such as pandemics. A further report on the obstacles to political participation for mobile citizens and residents should be envisaged, proposing measures to facilitate the political and civic participation of mobile EU citizens and third-country nationals, including access to democratic processes, including as volunteers, at local and European levels.

Finally, an important role for election integrity can also be played by civil society: to this end, funding for independent civil society organisations performing independent election observation should be envisaged.

5. Boosting Societal Resilience - A Vibrant Civil Society

The Commission's proposal on the Democracy Shield proposes four main axes to boost societal resilience: citizenship education and media literacy beyond education; engagement of individual citizens in democratic processes and initiatives, also via the development of civic tech; support of local democracy and involvement of the private sector in democracy enhancement initiatives; promotion of evidence-based decision making through, inter alia, a recommendation on supporting scientific evidence and its use in public policymaking, a European Research Area Act that reaffirms freedom of scientific research, and the possible establishment of a European Centre of Expertise on Research Security.

While these initiatives are welcome, they overlook the role that organised civil society and active citizen engagement, including volunteering, beyond elections and policy dialogue, plays in securing societal resilience such as in the area of civil protection, combatting and responding to climate change and its impact, as well as building trust between citizens and shared actions to prevent and respond to a wide range of other societal challenges.

In the area of education, associations and civil society organisations are among the main organisers of non-formal and informal education and lifelong learning initiatives, including volunteering, which are crucial to ensure that all citizens are equipped with the relevant citizenship skills (beyond media literacy) in a fast changing environment. Civil society organisations play a crucial role in watchdog activities and in exposing corruption. [Civil society has also a role to play in participatory methodologies to enrich scientific research and in evidence-informed policymaking processes.](#)

While the Commission's proposal on the Democracy Shield was proposed in parallel with the [EU Strategy for Civil Society](#), no synergies have been formally developed so far between the Shield and the Strategy. The importance of such synergies is recognised in the draft European Parliament's report on the Democracy Shield, together with the need for a strengthened action to protect civil society as a key actor in democracies, including from transnational repression, and to enhance civil dialogue practices by the European Commission.

Civil Society Europe supports an integrated approach between the Democracy Shield and the EU Strategy for Civil Society, especially in the recognition of civil society's role at the national and EU levels. In particular, CSE underlines the complementarity between the 10 guiding principles for dialogue with civil society promoted at the EU level by the EU Strategy for Civil Society, and the "Specific measures to support and protect civic space to enable the effective participation of civil society organisations" included in the [Commission recommendation on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes](#), part of the Defence of Democracy Package. While the implementation of the 10 guiding principles at the EU level is part of the Civil Society Strategy, the Democracy Shield should monitor the implementation of the Commission recommendation on promoting engagement and effective participation, in synergy with the mandate given by the Strategy to the Commission to organise national capacity-building and exchanges among Member States on the recommendation, in cooperation with relevant actors. Furthermore, it should also ensure the complementary implementation of the 10 guiding principles at the national level.

6. Funding Democratic Resilience - The Role of the Next Multiannual Financial Framework

As the Commission's proposal and the draft European Parliament report on the Democracy Shield recognise, the next Multiannual Financial Framework (MFF) will be crucial to ensure that democratic resilience is funded in the next period. The priorities of the Democracy Shield are mainly funded by the AgoraEU programme (mainly via the CERV+ strand and the News+ substrand): a strong AgoraEU programme is therefore crucial to support the objectives of the Democracy Shield. Yet, in the [draft negotiating box proposed by the Cypriot Council Presidency in June 2026](#), AgoraEU suffered more than proportional cuts to its budget.

Investing in democracy is a European public good, with positive spillover for all the Member States: that is why Civil Society Europe supports the European Parliament's proposal to allocate €10.72 billions (current prices) to AgoraEU. In particular, the CERV+ strand shall be adequately funded (the initial Commission's proposal assigned around 42% of the total AgoraEU budget to it), and it should include a [rapid response mechanism to protect human rights defenders in the EU](#), as well as flexible operating grants that allow civil society

organisations to perform their watchdog and advocacy activities and to encourage and promote active citizen engagement through volunteering on resilience measures.

CSE also supports the inclusion of fundamental rights and rule of law as horizontal conditions for accessing the funds of the National and Regional Partnership Plans (NRRPs), as well as the recommitment of decommitted funds for violation of such conditions towards AgoraEU, to support civil society of the country affected by the decommitment.

Furthermore, as the role of digital platforms in democratic resilience has been widely acknowledged by the Democracy Shield, CSE supports the proposal that revenues from fines against digital platforms under the Digital Services Act, Digital Markets Act, and AI Act shall be made available as an additional allocation of commitment and payment appropriations to AgoraEU.

7. Conclusions

The Democracy Shield represents an opportunity to strengthen democratic resilience of the EU and its Member States: in order to succeed, it needs to be the coordinating point of a 'whole society approach' to democratic resilience, mainstreamed throughout the different EU policies and adequately funded via the Multiannual Financial Framework. The Irish Presidency, via its focus on promoting values and security and its role in the MFF negotiations, has a special role to play in ensuring that the Democracy Shield is correctly implemented and funded, and it represents a real added value to support European democratic societies.



Co-funded by
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