CIVIL SOCIETY EUROPE

Q&A

Debunking Disinformation on EU Funding to NGOs

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Debunking Disinformation on EU Funding to NGOs

Starting from the European Parliament's Budgetary Control Committee (CONT) in 2017 and revived in 2024, some Members of the European Parliament (MEPs) from the centre-right and right-wing political groups have been questioning EU funds going to civil society organisations that engage in public interest advocacy. The narrative, which is being framed as a question of "transparency" is, in reality, part of a broad and EU-wide disinformation campaign to discredit civil society, in particular critical watchdogs, and organisations that advocate public interest positions. It has translated into very concrete impacts, such as the closure of EU funding programmes available to non-profit civil society organisations, or the exclusion of civil society watchdogs from consultation and multistakeholder processes where they have been able to represent non-profit interests for years or decades.

This campaign against NGOs contributes to a wider erosion of European democracy since the last EU elections, targeting not only civil society but also other independent voices, including independent media or scientists, and is intertwined with the political pushpack against progressive policies and legislation, for instance, on environmental protection, climate action, social protection and migration.

This Q&A seeks to debunk disinformation around the role of public interest advocacy for European democracy, and EU funding for civil society organisations.

1 Why does the European Union fund NGOs to participate in policy making?

Supporting civil society participation in policy making is key for democracy. For the EU to remain legitimate, citizens must have a voice alongside business, trade unions and other organised interests – especially in Brussels, where key decisions for citizens are made.

By empowering citizens to participate, civil society allows for their voices to be heard on EU matters, fostering ownership and accountability, contributing to building trust and collaboration between policymakers and the community. It ensures that legislation is based on evidence from the ground, reflects better equity in society, and encompasses the interests of many, not just a few.

This is grounded in the EU treaties: in particular Article 11 of the Treaty on European Union: *"The institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action. EU institutions maintain an open, transparent and regular dialogue with civil society and representative associations"* and it is reflected in the Charter of Fundamental Rights.

For this reason, since the 1990s, the European Parliament has called on the European Commission (EC) and Council to include funding for European civil society organisations in the EU budget throughout the different funding programmes such as Erasmus +, European Social Fund Plus, LIFE, CERV, EU4Health, and NDICI.

The need to support and strengthen civil society has been recognised by the European Commission, which adopted a Civil Society Strategy in 2025. This strategy is a necessary first step amidst attacks on civil society and its funding.

The Strategy highlights that: *Civil society plays an essential role in our societies contributing to policy making…Engagement with civil society is a cornerstone of EU policy making.. Sustainable and transparent financial support is .. essential for a thriving civil society and for ensuring that CSOs can operate independently".*

2. What is lobbying and what is advocacy?

According to the Council of Europe, lobbying means "promoting specific interests by communication with a public official as part of a structured and organised action aimed at influencing public decision making." Specific interest can be understood as a private interest linked to a for profit purpose.

Advocacy brings an additional dimension. Civil society organisations advocate non-profit interest, such as social justice, environmental protection or health. It also includes speaking up on behalf of someone else who is unable to speak for themselves and needs the support of another person or an organisation to channel their views and concerns to decision-makers. In addition, public interest advocacy is linked to challenging social injustice, human rights violations and environmental destruction, as well as protecting vulnerable people.

Advocacy is defined in EU law notably through programme regulations. For instance, the CERV programme includes advocacy activities to promote rights, thereby also strengthening the protection and promotion of Union values and respect for the rule of law, and contributing to democratic dialogue, transparency and good governance. The Justice Programme defines advocacy activities of civil society organisations as networking, litigation, campaigning, communication and other watchdog activities. Another example includes the Directive establishing minimum standards on the rights, support and protection of victims of crime, including advocacy among the support services for victims.

In the Directive on combatting corruption, adopted this year, the co-legislators have defined advocacy as an acknowledged form of interest or legal representation which can seek to legitimately influence public decision-making but does not entail an undue exchange of advantages and hence is not subject to become a gateway to corruption.

A further distinction should be drawn in the case of civil society organisations when promoting public benefit objectives, and voicing the concerns of citizens. This should include the ability to present those interests before institutions and engaging in the decision-making process to make known and protect those interests. This is what the Council of Europe calls civil participation, defined as "the engagement of individuals, NGOs and civil

[1] Recommendation CM/Rec (2017)2 on legal regulation of lobbying activities in the context of public decision making, adopted by the CoE Committee of Ministers on 22 March 2017, and explanatory memorandum

society at large in decision-making processes by public authorities" and "Civil participation in political decision-making is distinct from political activities in terms of direct engagement with political parties and from lobbying in relation to business interests."[2] According to Principle 6 of the Venice Commission OSCE ODIHR Guidelines on Freedom of Association, "associations shall have the right to freedom of expression and opinion through their objectives and activities (...) They shall have the right to participate in matters of political and public debate, regardless of whether the position taken is in accord with government policy or advocates a change in the law."

The OECD, in its lobbying principles, underlines the importance of increasing equity in stakeholder participation, by building or strengthening a coherent, comprehensive, effective and enforceable transparency and integrity system in public decision-making processes and recommends measures to protect those that scrutinise and report violations. The COE Venice Commission has also underlined that "Lobbying as a professional remunerated activity should be clearly defined in the legislation and be clearly distinguished from ordinary advocacy activities of civil society organisations, which should be carried out unhindered". This has been echoed by the EU Fundamental Rights Agency that has drawn caution as "lobbying laws can serve a legitimate purpose, but can also risk restricting CSOs' ability to inform the public on matters of general interest or carry out advocacy, if drafted or applied in a disproportionate manner."

Lobbying is regulated at EU level through the EU Transparency Register, which is a database listing 'interest representatives' (companies, associations, groups, and self-employed individuals) who carry out activities to influence EU policy and decision-making processes. Interest representation is legitimate as long as it complies with ethical and behavioural principles that are defined in code of conduct annexed to the Interinstitutional Agreement. These include for instance, in addition to full transparent information requirements, the prohibition to obtain or try to obtain information or decisions dishonestly or by use of undue pressure, improper behaviour or offensive language or using the registration for commercial gain or distorting or misrepresenting it. The interinstitutional agreement on the Transparency Register is founded on Article 11 TEU recognising the importance to "maintain an open, transparent and regular dialogue with representative associations and civil society". It also stresses that "dialogue enables stakeholders to present their views on decisions that may affect them and hence to contribute effectively to the evidence base on which policy proposals are made. Engaging with stakeholders enhances the quality of decision-making by providing channels for external views and expertise to be given". It is important to note that the EU Transparency Register excludes from its scope of activities "making submissions in response to direct and specific requests from any of the Union institutions, their representatives or staff, for factual information, data or expertise". However, while social dialogue and religious/philosophical dialogue are explicitly excluded from the scope of the agreement on the Transparency Register, civil dialogue is not.

[2] Recommendation of the Council on OECD Legal Instruments Transparency and Integrity in Lobbying and Influence.

3. Who has the most access to the European Commission and the European Parliament?

According to Transparency International's Integrity Watch, from January 2026 to November 2026, there are 8 companies and trade & business associations and only 2 NGOs amongst the top 10 lobby organisations who have had the most high level meetings with European Commission officials. Moreover, considering the total number of meetings with the Commission, 82% of the meetings were with organisations who promote their own interests or advance the interests of their clients, while only 17% of the meetings were with organisations who do not represent commercial interests. Please note that this data comes from the EU's Transparency Register, where organisations self declare which type of interest they represent.

In the case of the European Parliament, from January 2026 to October 2026, there were 15 companies and trade & business associations and only 5 NGOs in the top 20 lobbying organisations who held the most meetings with MEPs. The imbalance is even more pronounced among the political groups behind the Scrutiny Working Group report: the European Conservative and Reformists (ECR) and the European People's Party (EPP). In 2026, the ECR's top 15 most frequent lobbying contacts consisted exclusively of companies and trade and business associations. For the EPP, companies and trade and business associations account for 13 of the top 15 organisations meeting most frequently with its MEPs, leaving only two NGO representatives.

[3] MEPs can register meetings using either the organisation's EU Transparency Register name or via free text. The ranking here reflects the most common name that appears in the dataset. However, it is possible that an organisation had more meetings if those meetings were logged under a different name using free text.

4 What is the Scrutiny Working Group and how does it function?

The Scrutiny Working Group (SWG) on NGO financing is a temporary body established in mid-2025 by a majority in the Conference of Presidents, comprising the EPP, ECR and the Patriots. The SWG is under the Committee on Budgetary Control (CONT) of the European Parliament, and the CONT Coordinators endorsed the Conference of Presidents' decision with a majority of the EPP and far right political groups. The purpose of the working group is to scrutinise in particular EU funding granted to NGOs and civil society.

The SWG is composed of 13 members, chaired by the CONT Committee Chair (Andreas Schwab, EPP), who does not count among the thirteen. Up to now, only the EPP, ECR and the Patriots political groups have nominated representatives. S&D, Renew Europe and the Green/EFA have decided to boycott it, notably because of the undemocratic process governing the preparation and adoption of the report. It was initially set to work for 6 months but was extended. It has the power to request grant agreements and summon representatives from the Commission, other EU institutions, and/or beneficiaries for exchanges of views and an envisioned hearing. The SWG will produce a working document (co-rapporteurs: Dirk Gotink EPP, and Carlo Fidanza, ECR), which will be adopted by a simple majority in the SWG, and be transmitted to the CONT Coordinators for endorsement. This report will be presented on November 18th, and voted on November 24th without possibility for amendments. It will then be transmitted to the Conference of Presidents. On the basis of the working document, the CONT Coordinators may decide to seek an own-initiative procedure (INI report) and/or appoint a standing rapporteur to pursue follow-up actions.

The SWG was established after a campaign by the EPP against NGO funding, by using the discharge procedure of the 2023 EU budget. The SWG was approved by a right-wing majority of the EPP and the three far-right groups, both at the level of Conference of Presidents and in the CONT Committee. The group has met on four occasions - November 26th 2025, January 21st 2026, February 11th 2026, and March 11th 2026. They have also held hearings of Commission officials, as well as EC funding agencies. Meetings have been webstreamed.

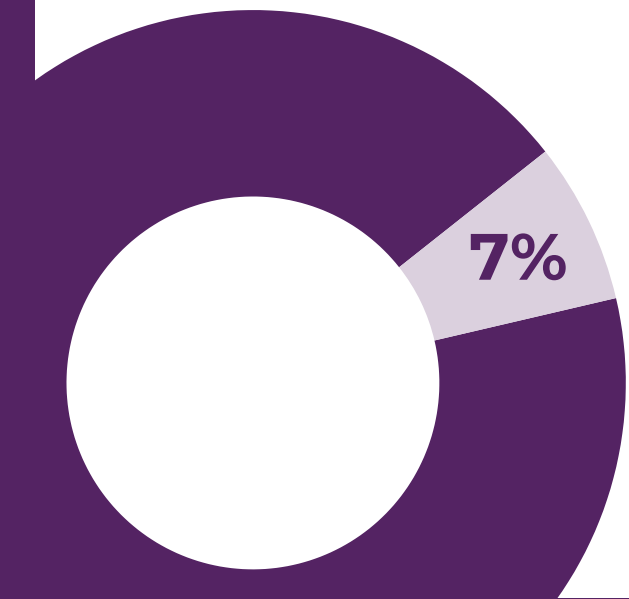
5. How much does the EU fund NGOs?

The adopted EU annual budget, in commitment appropriations, was €199.44 billion in 2025.This figure includes direct, indirect and shared management.

Only a fraction of this funding (€193.3 million or 0.1%) was allocated to operating grants, given to organisations whose work and mission contribute and help advance EU policies. However, please note that not all recipients of operating grants are NGOs, as there are also higher education institutions, public sector bodies and private sector actors in receipt.

EU funding for non-profits in 2024 represented 7% of the total budget allocation managed directly and indirectly by the European Commission (therefore excluding the EU budget managed with the Member States such as cohesion funding, or agriculture which represents 75% of the EU expenditures under the MFF). **However, not all non-profits are NGOs. According to the financial regulation, an NGO means a voluntary, independent from government, non-profit organisation, which is not a political party or a trade union. Therefore, NGOs received less than the 7% allocated to the non-profit sector in 2024, which also encompasses political parties, trade unions and others.**

In 2024, NGO funding as a whole represented 20% of the total funding available for private entities under both direct and indirect management. 80% was available to companies, academia, and international organisations. Since the Financial Transparency System is being updated at the moment, we cannot calculate these figures for 2025.



EU funding for non-profits represented **7%** of the total budget

6. Is the funding awarded to NGOs transparent? Is there a difference with other beneficiaries?

All beneficiaries of EU funding, including NGOs, must abide by the same financial rules. These rules have been amended and adopted by the European Parliament and the Member States.

All beneficiaries of EU funding can be searched through the Financial Transparency System. There you can find the amount of funding they have received and for which programmes. Under the EU Funding and Tenders Portal, you can find a description and summary of the project results that were funded and the different activities for which they received funding. Taken together, citizens can access **up to 123 data points for any given grant**. This includes management data, summaries of project, project results, public deliverables, other sources of funding and, where applicable, advocacy objectives. This applies both for project funding and operating grants to which also a system of deliverables applies to their work programme. It is important to note that as operating grants support the activities of the organisation, the work programme presented corresponds to the work programme adopted by their governing bodies. **To the best of our knowledge, the EU system, although imperfect, is the most transparent in the world.**

Nonetheless some improvements can be made:

- Interlink different platforms (Financial Transparency System, the EU Funding & Tenders Portal, and other Portals (such as for external funding or funding managed by national agencies under Erasmus +) to unlock the full potential of the data as a transparency and accountability mechanism.
- Ensure that funding managed through shared management with the Member States is available on the FTS (planned for 2028 by the Commission)
- Better distinguish between categories to equip policymakers with empirical information on budgetary allocations. Categories reflecting the EU Transparency register should be introduced (which lists 13 categories, including professional consultancies, law firms, companies & groups, trade & business associations, think tanks and research institutions, academic institutions, associations and networks of public authorities, and so on).
- Require the same level of transparency of procurement contracts as compared to grant agreements.

7. What does the ECA say?

The European Court of Auditors has found no misuse of funds in its special report on Transparency of EU funding granted to NGOs. It only made suggestions on how the European Commission's Financial Transparency System (FTS) can provide more timely and clearer information on EU funding to NGOs grantees, and guide non-profits to apply the definition of 'NGOs'. It is important to note that the ECA did not assess information available on the Funding and Tenders Portal, which includes description and summary of content of all projects, results and deliverables, in addition to financial information. Although the ECA report is focused on funding to NGOs, **similar conclusions could have been drawn if the report had also covered all types of beneficiaries** (profit, non-profit, public). A more precise definition of beneficiaries such as NGOs could provide policymakers with better information on the impact of budgetary allocations on specific types of beneficiaries, in addition to the fulfillment of policy objectives of several funding programmes or types of funding. We understand that the Commission is reviewing the self declarations of NGOs and non profits on the basis of an interpretative note integrating ECA recommendations such as distinguishing non-profits with for profit members from NGOs, and once this process is completed, will presumably reintegrate these among the searchable beneficiaries in the FTS. However, this would make sense if **other categories of beneficiaries among profit and non-profit could also be searchable** i.e.: companies & groups, consultancies, academic institutions, trade & business associations...if we refer to the categories in the EU Transparency Register. We believe that the Parliament should call on the Commission to further develop the FTS accordingly.

8. Does the Commission use EU funding to exert pressure on co-legislators?

Operating grants to NGOs are awarded under competitive calls for proposals, which are based on broad policy objectives defined by the EP and Member States in specific regulations. When applying, NGOs submit an application that includes a work programme for the year of activities. The application is submitted to an external evaluation procedure, but if selected, no changes in content can be requested by the EC. Therefore NGOs present activities that they plan to do and how they intend to deliver them (e.g. through studies, events, training, etc), but there are no instructions from the Commissions on activities that should be carried out.

The different legal texts establishing the different funding programmes support advocacy activities. For instance, the LIFE programme: the improvement of governance on environmental, climate change and related energy transition matters requires the involvement of civil society by raising public awareness, including through a communication strategy that takes into account new media and social networks, consumer engagement, and the broadening of stakeholder involvement, including non-governmental organisations (NGOs), in consultations on and implementation of related policies at all levels. It(...) support(s) a broad range of NGOs as well as networks of non-profit-making entities that pursue an aim which is of general Union interest, and that are primarily active in the area of the environment or climate action, by awarding, in a competitive and transparent manner, operating grants, in order to help such NGOs, networks and entities, to make effective contributions to Union policy, and to build and strengthen their capacity to become more efficient partners. For CERV: The general objective of the Programme is to protect and promote rights and values as enshrined in the Treaties, the Charter and the applicable international human rights conventions, in particular by supporting civil society organisations and other stakeholders active at local, regional, national and transnational level, and by encouraging civic and democratic participation, in order to sustain and further develop open, rights-based, democratic, equal and inclusive societies which are based on the rule of law, or Erasmus+: Strengthening European identity and fostering the active participation of individuals and civil society in democratic processes is crucial for the future of Europe and democratic societies (...)

The fact that the Commission does not use grants to interfere with other EU institutions was also confirmed by the Commission in an answer to a Parliamentary question that NGOs were not instructed to lobby and that they

are free to implement their activities, including advocacy activities. The European Court of Auditors also found that beneficiaries have never been mandated by the Commission to carry out specific lobbying activities.

Some media had access to and examined several grant agreements, and found no evidence that the Commission made EU funding conditional on promoting the Green Deal.

9. What is the Guidance Note?

The “Guidance on funding for activities related to the development, implementation, monitoring and enforcement of Union legislation and policy”, also known as the “Guidance Note” is a European Commission document dated 07 May 2024 that was publicly released in November 2024 during the budgetary control discussions on the discharge of the European Commission spending at the European Parliament. A revised version is currently available on the Funding and Tender Portal with no date. The Note is clearly aimed at funding for civil society, under the statement that “*while support for policy development activities including enhancing the involvement of civil society organisations remains an important and legitimate funding objective that should not be subject to unnecessary constraints, careful consideration should be given to the type of activities that the Union should not finance to advance these objectives*”.

The guidance note does not preclude advocacy or lobbying activities from being included in work plans under grant agreements. The only explicit requisite provided by the Guidance Note is that EU institutions should not require beneficiaries to engage in lobbying activities as a condition for receiving funding: “*This note aims at providing guidance on the type of activities the Union does not require as condition for funding as part of policy and legislation development, policy implementation, monitoring and enforcement in line with the objectives of the relevant basic acts*”.
The Guidance Note further says that “*presenting specific positions to an EU institution or some of its members, including examining and explaining the impact of a given policy or policy proposal, should be entirely the choice of the entity concerned but not mandated as a requirement or condition for Union financing*”. This confirms that these activities are permitted under EU grants, and are the sole responsibility of the beneficiaries and that their inclusion in grant agreements does not indicate that they are requested by the European Commission to beneficiaries.

In particular, the Guidance Note introduces the concept of “reputational risk” (not further specified in its definition), stating that “*funding agreements requiring beneficiaries to undertake specifically detailed activities directed at EU institutions and some of their representatives may entail a reputational risk for the Union.* Moreover, the guidance note expects grant applicants to avoid creating a reputational risk for the EU in their applications, when this concept is not transparent and clear for all parties involved: “*Work plans should be carefully drafted by applicants and assessed by the responsible authorising*

officers to avoid creating such reputational risk if incorporated into a grant agreement".

To our knowledge, the European Commission never mandated specific advocacy or lobbying activities. NGOs set their own priorities and work programmes in agreement with their members as part of their governance process.

There are serious doubts about the legality of this note and its compliance with the financial rules, the programme regulations and primary law, including the Charter of Fundamental Rights.

The note also seems to have been written to protect the reputation of the European Commission, shifting the compliance on the way the activities proposed by the NGOs are presented, rather than addressing any possible interference on the side of the Commission.To do so, the Guidance should have focused on the calls issued by the Commission and of the application process to ensure that the implementing agencies would not require NGOs to do certain activities.