

[Open Public Consultation on the EU Civil Society Strategy](#)

Civil Society Europe contribution

Deadline: September 5th

Fields marked with * are mandatory.

EU Civil Society Strategy - Open Public Consultation

Introduction

Civil society organisations, which are frequently referred to as non-State, not-for-profit, non-partisan and non-violent structures, through which people organise to pursue shared objectives and ideals[1], play diverse roles across our society and are active in several sectors, ranging from awareness-raising, education, providing support or services, policy monitoring and advocacy. The implementation of EU law and policies on the ground is often entrusted to these actors.

Civil society organisations strengthen social cohesion and preparedness, enhance policy effectiveness, and ensure that the voices of affected communities are heard. The engagement of such organisations is also a crucial element in the system of democratic checks and balances and the promotion and defence of EU values.

The Commission uses a comprehensive toolbox to support and involve civil society organisations. In addition to dialogues in a wide range of policy areas and the Better Regulation channels of consultation, there is regular involvement in a high number of our Commission expert groups, providing extensive tools and opportunities for all interested stakeholders to contribute throughout the policy-making cycle. The European Economic and Social Committee plays a key role in the engagement with civil society.

An enabling environment, which fosters meaningful engagement and participation and provides further support, is essential for all civil society organisations to carry out their work and contribute to EU policies. A safe and enabling environment for civil society organisations means a space where their fundamental rights and those of their members are protected. They should be able to pursue their activities without interference, and with sufficient and transparent access to financial resources, and steps at EU level should be taken to promote and protect the civic space and those active within it.

The need for stepping up engagement with and protection of civil society at EU level was stressed in the Commission President's Political Guidelines for 2024-2029, and reiterated in the mission letter to the Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection. The EU Civil Society Strategy builds on this political commitment and on Recommendation 2023/2836 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes, adopted as part of the Defence of Democracy Package.

Acknowledging the importance of the work done by civil society organisations for the success of EU policies, the EU Civil Society Strategy would establish a framework for action, both at EU and national level; its key objectives would be to foster dialogue with civil society actors and provide them with the necessary support and protection so that they can carry out their work.

The Commission would like to consult the general public and stakeholders on the key issues that the Strategy should address, structured around:

- The role of civil society organisations in the European Union;
- Challenges and risks faced by civil society organisations in the European Union;
- Measures currently in place at national and EU level to engage with, support and protect civil society organisations;
- Further steps to be taken at EU level to engage with civil society organisations and to support and protect them in their work.

Stakeholders likely to be interested in this initiative include:

- individual citizens
- Member States' national authorities
- EU institutions and bodies, including the European Parliament, the Council, the European Economic and Social Committee, the European Committee of the Regions, EU Agencies

- international organisations, such as the Council of Europe, OSCE-ODHIR, the OECD and the United Nations
- relevant EU-level networks
- civil society organisations (including youth organisations) and their networks/umbrella organisations
- national human rights institutions, equality bodies and their networks
- representatives of academia and researchers
- donors at national, EU and international level

[1] For the purpose of this public consultation, any reference to ‘civil society organisations’ should be understood as referring also to ‘human rights defenders’. See also the term used in Commission Recommendation (EU) 2023/2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes.

About you/your organisation

*** Question I am giving my contribution as:**

Answer

Individual

Answer

Civil society organisation

Answer

Network/umbrella organisation for civil society organisations

Answer

Academic or research institute

Answer

Business association

Answer

Company/business

Answer

Consumer organisation, including passenger rights' organisations

Answer

National human rights institution or equality body

Answer

Network of national human rights institutions or equality bodies

Answer

Public authority in EU Member State (municipal, local, regional or national level)

Answer

Public authority (EU level)

Answer

Public authority non-EU Member State

Answer

International organisation

Answer

Trade union

*** Question At which level do you primarily work?**

Answer

International level

Answer

EU level

Answer

Transnational level

Answer

National level

Answer

Regional or interregional
level

The role of civil society organisations in the European Union

Question In your view, what are the main areas in which civil society organisations contribute to society in the EU and at national level? (Please rank each option according to the importance, from **1-5**, **1 =most important**)

	1	2	3	4	5
*Representing and giving voice to different communities and interest groups	X				
*Advocating for policy change and defending fundamental rights and other common values, such as democracy and the rule of law	X				
*Delivering services and support to communities and individuals, including victim assistance and support	X				
*Acting as watchdogs and promoting transparency, accountability, and good governance	X				
*Strengthening social cohesion		X			

	1	2	3	4	5
*Strengthening societal resilience and crisis preparedness		X			
*Strengthening democratic participation, and civic engagement	X				
*Accompanying the implementation of EU policies		X			
*Other					

Question

In your view, what role do civil society organisations play in your Member State?

1500 character(s) maximum

Civil society organisations (CSOs) play a vital role at the EU level by fostering democratic participation and civic engagement, promoting human rights, and ensuring diverse voices are heard in policymaking. They act as crucial intermediaries between citizens and institutions, helping to hold EU bodies accountable and increase transparency. CSOs contribute expertise, monitor the implementation of laws and policies, and advocate for inclusive, rights-based approaches across sectors.

Importantly, they bring the voices of underrepresented and marginalised groups to the policy table, ensuring these groups can participate in EU debates and decision-making. CSOs also help strengthen social cohesion, societal resilience and crisis preparedness by addressing emerging societal challenges and mobilising citizens around shared values like democracy, equality, and sustainability.

At the EU level, they help shape legislation, provide evidence-based input to policies, raise citizens' concerns and aspirations, and engage in dialogue that improves governance. Furthermore, CSOs often implement EU-funded projects, delivering services and fostering local empowerment. Their watchdog role is essential in safeguarding fundamental freedoms and countering democratic backsliding.

Overall, CSOs enrich the EU's democratic fabric by promoting participation, defending rights, and contributing to more effective and inclusive policymaking.

Challenges and risks faced by civil society organisations in the European Union

Question Please indicate your perception of the challenges and risks faced by civil society organisations in the European Union. You can provide examples in the field below.

	Ver y hig h	Hig h	Neutra l	Lo w	Ver y low	Do not kno w
*Restrictive legal framework/legal barriers (disproportionate legislative restrictions concerning the freedom of association, access to information, loss of charitable/public benefit status etc.)	X					
*Legal action / strategic lawsuits against public participation (SLAPPs)		X				
*Criminalisation of the work of civil society organisations	X					
*Subjection to disproportionate or burdensome fines		X				
*Administrative barriers (burdensome registration processes, excessive administrative requirements or controls)	X					

	Ver y hig h	Hig h	Neutra l	Lo w	Ver y low	Do not kno w
*Suspected surveillance (e.g. by law enforcement)		X				
*Verbal threats and attacks against civil society organisations offline and online (e.g. online threats or harassment, disinformation)	X					
*Negative media reports/campaigns	X					
*Physical threats and attacks (e.g. vandalism of premises or property, physical attacks against employees/volunteers)		X				
*Limits on access to information		X				
*Censorship (e.g. the suppression of public communication, other information by public authorities)		X				
*Limited or inflexible funding, funding cuts	X					
*Operational challenges (e.g. staffing, use of digital tools, cybersecurity, lack of specialised knowledge/training)	X					
*Legal fragmentation within the EU and difficulties to operate in other EU Member States (e.g. due to lack of recognition, administrative burden, etc.)	X					
*Other types of challenges (if aware, please provide examples below)		X				

Question If relevant, please provide an example in accordance with the above identified challenges

1500 character(s) maximum

The legal, regulatory, and administrative environment for civil society in the EU has become increasingly restrictive, especially for CSOs working on human and environmental rights, migration, LGBTQ+ issues, democracy, and advocacy. Many CSOs face smear campaigns, funding restrictions, burdensome procedures, and laws limiting their activities - particularly in countries targeting foreign funding or advocacy work.

Even in well-established democracies, CSOs report increasing obstacles to participation. Freedom of assembly is also under threat, with legal and policing tactics limiting protest rights. Some CSOs are affected by the use of political and legal actions aiming to treat their activities as illegitimate, illegal surveillance, and unfounded and abusive civil and criminal proceedings.

Cross-border operations remain difficult due to fragmented legal recognition. EU funding is also at risk, with political efforts to defund critical NGOs and restrictive interpretations of programmes funding legitimate advocacy activities. Some EU legislation, such as the Directive on interest representation, may further limit civic space by imposing vague, burdensome rules on organisations receiving non-EU funding. Overall, opportunities for CSOs to meaningfully engage with decision-makers remains limited throughout the policy-making process.

Question Why do you think it is important to protect civil society organisations?

1500 character(s) maximum

Civil society organisations are essential to a healthy democracy. They give voice to citizens, promote accountability, defend fundamental rights, and ensure that diverse perspectives are reflected in policymaking. CSOs often reach the most marginalised communities and advocate for key issues of public interest.

Protecting CSOs means safeguarding the freedoms of association, assembly, and expression that are core to the EU's democratic values. Without an enabling environment - free from intimidation, legal or financial harassment, or political interference - CSOs cannot operate independently or fulfil their role in holding power to account.

In times of democratic backsliding and shrinking civic space, protecting CSOs is not optional: it is essential to maintain trust in institutions, strengthen social cohesion,

and ensure citizen participation. The EU must lead by example and guarantee that civil society can thrive across all Member States and policy areas.

Question In your view, are some civil society organisation facing particular challenges/more at risk than other civil society organisations (e.g. working on different topics or providing different services)?

YES

NO

Question If YES, in which areas are these civil society organisations active? And which particular challenges / risks are they facing?

1500 character(s) maximum

Civil society organisations and human rights defenders working on certain topics face particular risks and heightened challenges compared to others. This particularly affects organisations active in areas such as migration and refugee rights, human and environmental rights, women's rights, sexual and reproductive health and rights, LGBTIQ+ rights, anti-racism, and the protection of underrepresented and vulnerable groups.

CSOs engaged in advocacy and watchdog activities are also particularly targeted, facing pressure for holding authorities and decision-makers accountable. They are often confronted with strategic lawsuits, public smear campaigns, and restrictions on participation in policy-making processes.

Overall, CSOs and human rights defenders are increasingly targeted through political and legal tactics aimed at delegitimising their work and restricting their activities. Common challenges include the misuse of legislation, unfounded civil and criminal proceedings, and public narratives framing their actions as illegitimate or illegal.

Data from the EU Fundamental Rights Agency confirms that the vast majority of CSOs surveyed in 2023 faced threats or attacks, with smaller and grassroots organisations being particularly vulnerable due to limited resources and capacity.

Question What is your overall assessment of how these challenges for civil society organisations have evolved over the last 5 years?

Answer

Significantly
improved

Answer

Somewhat improved

Answer

Stayed the same

Answer

Somewhat worse

Answer

Much worse

Question(Optional follow-up): Please briefly describe how the situation has worsened/improved.

1500 character(s) maximum

In several Member States, governments have introduced laws restricting access to foreign funding, increasing administrative burdens, or threatening CSOs with deregistration. Organisations working on migration, gender equality, human and environmental rights, or the rule of law have faced smear campaigns, police intimidation, and legal harassment.

Some recent EU legislation - such as the Directive on anti-money laundering and counter-terrorism or the Directive on interest representation - can also have undue and unintended consequences on CSOs. Vague or overly broad definitions and disproportionate compliance requirements may lead to excessive scrutiny, administrative burdens, or reputational damage, thus contributing to the further shrinking of civic space.

SLAPPs (Strategic Lawsuits Against Public Participation) have become more frequent, targeting activists and organisations with abusive litigation to silence criticism. Freedom of assembly has been curtailed through excessive policing and restrictive legislation.

Even at EU level, worrying trends have emerged: attempts to defund critical voices through political pressure in the European Parliament, and proposals to limit the use of EU funds for advocacy - such as within the LIFE programme - risk undermining CSOs' core mission and activities.

Meanwhile, meaningful access to decision-making remains limited and often tokenistic.

Existing measures to support and create an enabling environment for civil society organisations

Question In your view, how effectively does your country support an enabling environment for civil society organisations to operate freely and independently?

Answer

Very effectively

Answer

Somewhat effectively

Answer

Not very effectively

Answer

Not at all effectively

Answer

Do not know

Question Which of the following measures do you think are most important to ensure a safe and supportive environment for civil society organisations in your country?

Maximum 3 selection(s)

Answer

Legal protections for freedom of association, assembly and expression

Answer

Access to predictable, transparent and sustainable funding

Answer

Clear rules and transparent criteria for participation in policymaking and public consultations, and effective mechanisms to enable such participation (e.g. access to information, regular feedback cycles)

Answer

Protection from threats, harassment or attacks

Answer

Public recognition and awareness of civil society organisation's work

Answer

Impact assessments on the impact of laws on civil society organisations

Answer

National policies or strategies on civil society

Answer

Other

Dialogue / Participation

Question Are you aware of existing rules or structure in your country (EU Member State(s)) concerning how public authorities engage with civil society organisations, in particular to allow them to meaningfully participate in the decision-making process? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

While some EU Member States have formal mechanisms for civil society participation, these are often inconsistently or poorly implemented. In many cases, engagement remains limited in scope and lacks transparency, with consultation processes whose impact on decision-making remains unclear. Additionally, there is a clear lack of measures to ensure civil dialogue at national level on EU issues, and a lack of transparency on the position of national governments in preparatory works and on who is in charge of different files.

In some countries, civil dialogue structures exist - such as national councils for civil society or social and economic committees - but they often have limited access to legislative processes. Participation is rarely adequately resourced or inclusive, excluding smaller or marginalised CSOs.

Some good practices do exist. For example, in Finland the government works closely with civil society through the Advisory Board on Civil Society Policy (*KANE*), which includes both government and CSO representatives. In Denmark, the Council for Civil Society (*Frivilligrådet*) is also composed of representatives from civil society, municipalities, and public authorities. The Council acts as an advisory body to the government on policies affecting civil society, volunteering, and civic engagement. Open consultations on proposals of new policies or laws are often accompanied by feedback mechanisms.

Question Are you aware of existing measures at EU level to engage with civil society organisations, in particular to allow them to meaningfully participate in the decision-making process? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

While several EU-level measures exist to engage with civil society - such as public consultations, the Civil Society Forum in enlargement and neighbourhood policy, and structured dialogue in certain programmes - these often result in ad hoc, selective, or purely consultative “tick the box” exercises. Consultations are often not tailored to civil society organisations, and seem geared at confirming pre-identified policies options. The Better Regulation agenda includes stakeholder engagement, mostly in the form of consultations, but CSOs often face barriers such as short deadlines and lack of feedback on how their input is used.

The absence of an overarching binding framework for civil dialogue at EU level leads to unequal and ad hoc engagement across institutions. A formalised interinstitutional agreement on civil dialogue, grounded in Article 11 TEU, would be a significant step forward to ensure consistent, inclusive, and impactful participation of civil society at all stages of the policy making process.

*** Question What further measures could be considered by the EU to engage with civil society organisations to ensure they can meaningfully participate in the decision-making process at EU level?**

1500 character(s) maximum

Building on Article 11 TEU, the EU institutions should adopt a binding Interinstitutional Agreement on Civil Dialogue to ensure structured and transparent engagement across the entire policy cycle. The Agreement should set common standards and procedures and define clear responsibilities within each institution.

Specific provisions on civil dialogue should be included within the Better Regulation toolbox, and dedicated civil society focal points should be established in all EU institutions, with adequate staffing and resources. Mechanisms such as forums, advisory bodies and participatory processes should be mainstreamed, and feedback on CSO input improved.

The Civil Society Platform should be co-created with CSOs and serve as a permanent mechanism for systematic civil dialogue, addressing fundamental rights and democracy issues across all policy areas, as well as overarching policy issues. It should not be a stand-alone initiative but a foundational step toward a comprehensive civil dialogue framework. The Platform should include diverse voices and foresee regular high-level meetings and follow-up mechanisms.

Dedicated civil dialogue mechanisms should also be set up at the national level, involving EU institutions' representations, liaison offices, and national governments.

Ultimately, civil dialogue should be treated as distinct from, but complementary to, citizen engagement and social dialogue, with dedicated institutional support, transparency, and accountability.

Question In your view, in which policy areas should civil society participation be further strengthened?

1500 character(s) maximum

Civil society participation should be strengthened across all policy areas, with particular focus on enabling the inclusion of organisations composed of or advocating on behalf of marginalised or underrepresented groups. Priority areas are those where rights, equity, and democracy are most at stake, such as:

- Rule of law, democracy and fundamental rights, where civic actors safeguard democratic space and must reflect diverse voices.
- Migration and asylum, where CSOs supporting migrants and refugees are often excluded despite their frontline experience.
- Climate and environmental justice, where local and grassroots actors play a critical role in sustainability transitions.
- Social inclusion, anti-discrimination, and equality, especially regarding gender, race, disability, and LGBTIQ+ rights, which require strong, intersectional civil society engagement.
- Digital policy and AI governance, where civil society input is essential to ensure that technology respects human rights and democratic values.

- Fighting and preventing corruption

Protection

Question Are you aware of existing measures in your country to protect civil society organisations that are at risk? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

Question Are you aware of existing measures at EU level to protect civil society organisations that are at risk? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

Protection measures for civil society organisations and human rights defenders at risk within the EU remain fragmented, underfunded, and unevenly accessible. While there is significant expertise and resources, no institutional EU-wide mechanism exists to document attacks and ensure consistent access to support.

Current tools like ProtectDefenders.eu and the EU Guidelines focus exclusively on civil society actors based outside the EU, leaving those inside without access to structured support mechanisms, rapid response measures or urgent funding. As a result, EU-based HRDs and CSOs at risk are left without established support - particularly in emergencies - and can rely only on ad-hoc civil society-led mobilisation.

This fragmented landscape highlights the urgent need for a permanent, well-equipped protection system that can provide coordinated legal, financial, and psychosocial assistance to at-risk actors within the EU.

Question Please indicate which of the following measures, to be taken at EU level, would in your view be most important to protect civil society organisations in the EU (ranking from 1 to 5, 1=most important)

	1	2	3	4	5
*Gather, consolidate and report information on the situation of civil society organisations across the EU			X		

	1	2	3	4	5
*Introduce specific protection measures for civil society organisations facing threats and attacks at national level (e.g. hotlines, dedicated complaint mechanisms within police structures, psychological support, safe housing, relocation, etc.)	X				
*Strengthen the role of National Human Rights Institutions to protect civil society organisations		X			
*Specific protection measures for civil society organisations facing threats at EU level	X				
*Funding for civil society organisations promoting democracy and common values	X				
*Funding for civil society for protection measures, including legal, cyber, physical and psychological protection	X				
*Funding for capacity building and training of civil society organisations, including on holistic protection	X				
*Work with international organisations to strengthen the protection for civil society organisations		X			
*Reinforce regular dialogue with civil society organisations at national level		X			
*Support to EU Member States to put in place participation frameworks for civil society organisations		X			
*Reinforce regular dialogue with civil society organisations at EU level	X				
*Facilitate cross-border activities of civil society organisations in the EU	X				

Question What further measures could be considered by the EU to better protect civil society organisations that are at risk?

1500 character(s) maximum

The EU should create a sustainable, independent protection mechanism combining strengthened collection of alerts and resources from the national and local level, linking monitoring to action vis a vis Member States, and rapid response measures.

This mechanism must allow timely reporting of attacks and trigger prompt investigations and support, including emergency funding, legal aid, psychosocial help, and digital security, ideally within 2–3 days. It must be a long-term, independent structure based on human rights standards and non-discrimination.

A strong model could include a central EU coordination hub made up of leading civil society groups to manage emergency resources and build capacity through training and knowledge-sharing. This hub would work closely with national protection hubs -independent coalitions providing direct support and legal aid. Cooperation with National Human Rights Institutions and equality bodies should also be encouraged.

This two-tiered system would ensure accessible, effective protection at both EU and national levels, strengthening resilience and safeguarding civil society's vital role in democracy.

Moreover, the European Commission should prioritise consistent and timely transposition of the Anti-SLAPP Directive (EU 2024/1069) across Member States by the 2026 deadline, providing clear implementation guidance and supporting awareness-raising, capacity-building, and judicial training.

Funding

*** Question How important do you think it is to provide public funding at EU and national level for civil society organisations' activities to support them in the various roles they play in society (e.g. advocacy, support services, watchdog function, awareness raising, etc.)**

Answer

Very important

Answer

Important

Answer

Moderately important

Answer

Slightly important

Answer

Not important

Answer

Do not know / no
opinion

Question Do you think that public funding provided in your country for the work of civil society organisations is sufficiently accessible and transparent?

Answer

Yes, it is generally transparent and accessible

Answer

It is somewhat transparent and accessible, but improvements are needed

Answer

No, it lacks sufficient transparency and accessibility

Answer

I am not aware of how funding is managed

Answer

Do not know / No opinion

Question What are the main obstacles preventing civil society organisations from fully benefiting from public funds at national or EU level?

1500 character(s) maximum

CSOs face persistent structural obstacles in accessing public funds at both national and EU levels. Funding remains insufficient overall, with most support limited to short-term and project-based grants, offering little or no core, flexible funding for operational costs - undermining long-term planning and independence. Burdensome application and reporting procedures further disadvantage smaller and grassroots

organisations, especially those working with marginalised groups. Obstacles to cross border donations and philanthropy remain, despite ECJ rulings.

In some MS, political hostility and restrictive laws (e.g: foreign agent laws) severely limit access to EU or foreign funding, threatening CSO autonomy. Restrictions on using public funds for legitimate advocacy activities are also growing. Recent attempts at EU level to limit such use - e.g: within the LIFE programme - reflect this worrying trend.

Shrinking civic space and public smear campaigns also weaken CSOs' capacity to raise funds. Reliance on a few donors makes CSOs vulnerable to political shifts, while private and philanthropic funding remains underdeveloped in many EU countries.

While EU programmes like CERV play a key role, they are underfunded. More predictable, core, and inclusive funding is needed - particularly a standalone programme, directly managed by the European Commission, to support civil society, strengthen civic space, and uphold democracy, equality, the rule of law and EU values.

*** Question Do you think that the current legal frameworks in the EU sufficiently allow for cross-border funding (e.g. donations made from a donor in one Member State to a civil society organisation based in another Member State)?**

Answer

Yes

Answer

Improvements are needed

Answer

No, there are barriers

Answer

Do not know / No opinion

Question Are smaller, grassroots or marginalised community-based civil society organisations adequately supported by existing funding mechanisms?

1500 character(s) maximum

Smaller, grassroots, and marginalised community-based CSOs often struggle to access existing funding mechanisms, both at national and EU level. Although

programmes like CERV have made efforts to support a wide range of actors, structural barriers persist. Funding procedures are often highly complex and resource-intensive, putting smaller or less formalised organisations at a disadvantage. Application and reporting requirements can be overly technical and designed with larger organisations in mind.

Organisations representing underrepresented or marginalised groups face added challenges due to limited administrative capacity, lack of visibility, and systemic inequalities. Support for advocacy work is also insufficient, and limitations and attacks at both the national and the EU level risk further restricting access to funds for organisations working to advance equality and rights.

More tailored, accessible, and inclusive funding streams are needed to match the needs of smaller and grassroots actors – who are often closest to affected communities. Regranting mechanisms are a positive measure to address these challenges and must therefore be reinforced and improved. In addition, direct management is critical to ensure national civil society organisations can access funding on areas related to fundamental rights and values.