

Warsaw, November 25, 2025

Stefan Batory Foundation's feedback to the European Commission's proposal on the EU's next long-term budget (MFF) for cross-border education, training and solidarity, young people, media, culture, and creative sectors, values, and civil society

Why we need to strengthen the stability of civil society organisations in Europe

Stefan Batory Foundation welcomes the European Commission's proposal for the AgoraEU programme as well as other initiatives falling in the scope of current consultations, related to cross-border education, training and solidarity, young people, media, culture, and creative sectors, values, and civil society. In our opinion they not only are in line with the *Political Guidelines for the Next European Commission 2024-2029* set by its President, but also with the priority of a free and democratic Europe set out in the 2024-2029 EU Strategic Agenda. In our feedback opinion we would like to especially focus on planned AgoraEU programme endorsing not only the scope of its work, which aims to support the pillars of a strong democracy, including culture, media and civil society. We are also pleased to note the positive developments regarding the value of proposed support, as the AgoraEU proposal provides for a total financial envelope of EUR 8.58 billion, exceeding the combined allocations of the current CERV and Creative Europe programmes and thereby enabling reinforced investment in culture, the media, democracy, rights and equality. We believe that the Commission's proposal will go a long way towards meeting the needs of European societies and recognises the role that civil society organisations (CSOs) play in meeting those needs.

Why the European Union needs strong and sustainable civil society organisations?

Through our work we observe that CSOs participate in solving the most important problems facing the European Union and its citizens. They reach millions of Europeans, responding to their daily needs, offering basic services and access to leisure activities. CSOs ensure that public administration places the expectations of individual communities and their members at the top of its agenda. In doing so, they foster understanding of the European project and its underlying principles, working to promote and protect fundamental rights, democracy, sustainable development and social inclusion. In this way, CSOs' work contributes also to a more firmly rooted democratic system.

Organisations are also involved in combating corruption, helping to ensure that EU budget funds are spent effectively and transparently. In the absence of state bodies responsible for countering disinformation, or where such bodies are ineffective, it is still up to organisations to identify false content and other forms of online manipulation. However, these organisations have proven themselves most effective during the various crises of recent years, when they were the first to take the lead in mitigating their effects and helping the most vulnerable members of our societies.

In current geopolitical circumstances, we should also remember about strengthening Europe's preparedness and readiness, as it has been articulated in Sauli Niinistö's report [Safer Together](#). It called for a need for a systemic the whole-of-society approach when it comes to security. It translates into engagement in the space between an individual citizen and the state via civil society understood as a wide range of actors including CSOs, professional associations, trade unions, political parties, community organizations, local/citizen media, informal groups. The more vital and vibrant such actors are, more resilient democracy is to the multitudes of internal and external threats. The Ukrainian experience, as documented in the Batory Foundation's report [Resilience and Solidarity – Ukrainian Civil Society in the Face of War](#), demonstrates that CSOs play also a decisive role at every level of resistance and resilience during the war effort. For this system to function effectively, it needs not only stable entities with access to appropriate resources, but also the glue that binds its individual elements together in the form of social and public trust.

Access to stable and significant amount of EU funding is needed to sort the challenges EU faces

None of the abovementioned goals would be possible without EU funding. The results achieved thanks to projects already financed by EU funds, including the CERV and Erasmus programmes, are incredible (e.g. see [HERE](#)). However, it is difficult not to notice that many initiatives have still not been implemented due to a lack of funds to finance even good projects (highly rated by evaluators). Many smaller organisations have not even attempted to apply, overwhelmed by the administrative burden. Furthermore, an analysis of the distribution of funds allocated from the CERV programmes, and even more so from Creative Europe and Just programmes, shows a disproportion in the scale of funds allocated to support entities located in Northern and Western Europe, compared to initiatives from Eastern and, to some extent, Southern Europe (e.g. see [HERE](#), p. 24). To some extent, this is also due to the greater professionalism and wealth of entities from Northern and Western Europe, which have the resources to write larger number of projects and the funds to make their own financial contribution to the projects they submit (due to the own financial contribution requirement).

For the new EU funding period, we need (1) solutions that will enable us to fully capitalise on the potential of the European civil society sector. (2) They should also promote greater access to EU funds for smaller organisations, including those operating at local level. (3) The shape of the future EU budget should also allow for the implementation of the provisions of bold policy documents recently adopted by the European Commission. These are, namely, the [European Civil Society Strategy](#) and the [European Democracy Shield](#).

Recommendations for the next EU funding period

First of all, we would like to welcome the proposals put forward by the European Commission on July 16. It seems to recognise the role played in the European Union by civil society organisations, cultural institutions and the media. It also proposes a generous pool of support for them. We urge that in further work on the shape of the EU budget, consideration be given to measures in three main areas that will allow the potential of the European civil sector to be fully utilised:

1. Ensuring adequate resources in the next MFF, manifesting itself in

- Confirming the €8.582 billion allocation for the AgoraEU Programme proposed by the Commission;
- Confirming the €3.596 billion allocation for the CERV+ strand, with a clear prioritisation of civil society participation and protection measures;
- Acknowledging that Europe's resilience, competitiveness, and democratic vitality depend on citizens equipped with civic, digital, and life skills – that are core to Erasmus+ and lifelong learning. However, in order to fully respond to current needs and increase the percentage of the EU population benefiting from the programme, rasmus+ must be reinforced not only in terms of resources, but also in terms of its mission: promoting active citizenship, intercultural understanding, solidarity, life competencies and future-oriented skills like STEM, sustainability, and entrepreneurship. On top of that, informal learning and lifelong education should be reaffirmed within the Programme.

However, in order to operate effectively, civil society organisations need support that is not only adequate in amount, but also allocated on the basis of appropriate rules. This is addressed in the next section of our recommendations.

2. Increasing the accessibility of funds for smaller CSOs and making spending rules more flexible

- We acknowledge that in its communication on the AgoraEU programme, the Commission confirmed its willingness to continue and even expand the use of grant distribution by intermediaries (through so-called cascade grants or re-granting). This solution should be extended to all programmes and their individual strands, but its introduction should be accompanied by important additions:
 - The non-profits playing a role of intermediaries' independence need to be secured, so they are not tied to any government interests, or biased – in relations to the latter aspect organisations holding intermediaries' role compliance with the Charter of Fundamental Rights should be verified; both issues can be ensured as a fundamental eligibility criterion for access to funding;
 - Limiting OR removing co-financing requirement for non-profit organisations acting as intermediaries under cascading grants mechanism, as these entities actually implement a delegated activity (see below for further details).
- The Commission also expressed its desire to simplify procedures by settling expenses on the basis of lump sums and results achieved (rather than costs incurred and covered by detailed documentation), using multi-annual grants and measures aimed at grassroots initiatives. Current proposal mention also adjusting lump sums for inflation. These are all valuable solutions that civil society organisations have been seeking for years, suggesting that they will help to broaden access to EU funds. We would like to emphasise the need to maintain these solutions as they have been proposed by the Commission.

- To be able to plan strategically and carry out long-term activities, CSOs also need access to institutional (operating) grants, which are not currently explicitly guaranteed in all new programmes and their individual strands. This situation should be revised in line with currently valid Regulation (EU) 2021/692 establishing the Citizens, Equality, Rights and Values (CERV) Programme (2021–2027), Regulation (EU) 2021/818 establishing the Creative Europe Programme (2021–2027) and Regulation 2021/693 establishing the Justice Programme (2021–2027) – that explicitly include the possibility of awarding operating grants to cofinance the functioning of EU umbrella organisations and networks.
- Current documents also lack clear references to co-funding levels (which have been relatively too high to date), including within the re-granting system. In the case of such cascading grants, the entity becoming the grants operator for other organisations often has to raise large amounts of its own funds. And it happens while it makes little use of the administered amounts itself, as it usually transfers the vast majority of them to others, effectively carrying out tasks commissioned by the European Commission. It is difficult to find funding for such own contributions – donors usually prefer to support individual activities themselves, so that they can then attribute their effects solely to their own results. Thus, keeping such co-funding requirements may become a barrier to access EU funds for beneficiaries such as CSOs, local media outlets and smaller cultural and creative organisations, particularly in Member States where national or private funding is limited or politically constrained.
- It is worth introducing solutions that would prevent a situation where, as a result of immediate needs or political decisions, including in a selected Member States, civil society organisations are deprived of access to funds that can be flexibly transferred between the programmes. This can be achieved by establishing, in the regulations defining individual programmes and the rules for their implementation, a minimum level of funds that must be allocated to independent civil society organisations under each programme and its every strand.

3. Introducing mechanisms that will enable the implementation of EU policies on civil society

- Ensuring the quality of legislation, including EU legislation constitutes an important area of activity for many organisations. In doing so, CSOs draw on their experience and knowledge to ensure that the regulations developed by decision-makers better respond to the needs of individual communities. Unfortunately, the draft Commission proposal does not explicitly mention advocacy and the organised participation of civil society organisations in public policy-making among the activities to be supported. Thus, we would like to encourage the Commission to explicitly recognise in the AgoraEU regulation the role of advocacy as a key part of CSOs' work and the involvement of civil society in policymaking as integral elements of strengthening democratic participation and societal resilience, in line with the programme's general objective.

- We also regret that the legal provision in the current Citizens, Equality, Rights and Values (CERV) regulation establishing a formal Working Group on Civil Dialogue was not carried over into the AgoraEU proposal and urges the Commission to revise the Regulation in this regard. This already known solution should be maintained so that we can use the experience of a proven structure when creating a new system of civil dialogue, announced in the European Civil Society Strategy.
- Current proposal lack also any mechanism that would help coordinate support for similar objectives provided by various public and private entities in the European Union as well as identify and fill any potential gaps in available support. This could be fixed by adding a coordination mechanism to facilitate strategic dialogue and enable co-granting and strategic collaboration with EU programmes. The MFF proposals already promote co-investment over traditional public grants but lack adequate entry points for foundations. The latter entities and the philanthropic sector are ready to engage, bringing resources, expertise, and local reach - but need a structured interface and enabling frameworks to do so effectively. Responding to this willingness would also be facilitated by the implementation of the support for dialogue between various donors and philanthropic organisations announced in the European Civil Society Strategy.

These are just the most significant solutions that are worth implementing in the final version of the documents defining the structure and rules for implementing the future multiannual financial framework. We declare our commitment to further work on developing solutions that best meet the needs of civil society organisations and, through them, are more effective in solving the problems of our societies.

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The Stefan Batory Foundation is a Polish public benefit organisation supporting the development of democracy and civil society in Poland and the countries of Central and Eastern Europe.

The **Foundation** supports initiatives which serve to increase civic participation, protect human and civil rights and promote public scrutiny over functioning of public institutions. In its international activity, the Foundation engages in initiating debate on Poland's strategic interests on the international arena, Poland's place in Europe and in the world, as well as on Poland's and the EU's relations with the eastern neighbours. We place great value on exchanging experiences with and supporting Ukraine.

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