

**EWL'S RECOMMENDATIONS TO THE EUROPEAN COMMISSION
ON THE EU CIVIL SOCIETY STRATEGY**

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Introduction

The European Women's Lobby (EWL), as the largest umbrella organisation of women's non-governmental organisations in the European Union (EU), welcomes the Commission's commitment to adopt a **European Civil Society Strategy**. This initiative marks a step toward meaningfully engaging with, protecting, and supporting civil society organisations (CSOs) within the EU and beyond.¹

We particularly welcome the Commission's recognition of the essential role that the civic space plays in upholding fundamental rights and the rule of law. A civic space that enables all citizens, including women and girls, human rights defenders, and marginalised communities, to connect with policy makers and participate in decisions that affect them. Independent civil society with a critical voice is crucial to well-functioning democracies.

This recognition comes at a pivotal moment. Across many EU Member States, CSOs are facing increasing criticism, stigmatisation and a surge in anti-civil society rhetoric, both online, in mainstream media and in (some) political circles. Organisations defending fundamental rights and civil society are being met with political hostility, funding insecurity, surveillance, and restrictive legislative or administrative measures that undermine freedoms of assembly, expression and association.

These pressures are not isolated incidents. The shrinking of civic space is part of a broader, coordinated backlash against women's rights and gender equality as well as human rights, often driven by populist, authoritarian, and anti-rights actors. Women's rights organisations and feminist activists are particularly vulnerable, increasingly targeted by campaigns aimed at silencing dissent and dismantling decades of progress. In several Member States, we are witnessing deliberate efforts to roll back advances in sexual and reproductive health and rights, protection against gender-based violence, and equality legislation. These regressive developments pose a direct threat to the integrity of democratic systems and human rights across the EU and to the values of the EU itself.

In this context, the need for a **robust, coordinated, and strategic EU-level response has never been more urgent**.

The EWL urges the European Commission to establish a long-term, coherent Civil Society Strategy at both EU and national levels. This strategy must be grounded in the European Union's core values: democracy, human rights, and the rule of law. Crucially, the Commission must move beyond declarations and demonstrate leadership through concrete action. This includes providing structured and sustained support for CSOs, safeguarding fundamental rights, and fostering inclusive civic participation across all Member States.

As a long-standing advocate for women's rights and gender equality in Europe, the EWL is committed to contributing to the development, implementation, and monitoring of this Strategy. Our objective is to ensure that it delivers meaningful, lasting support to civil society, particularly to women's rights organisations, which play an important role in defending democracy, producing positive changes in society, advancing equality, and amplifying the voices of women and girls across the EU. We view this

¹ [Communication](#) from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions for an initiative on EU Civil Society.

Strategy as an opportunity to build a resilient, sustainable, inclusive, and feminist democratic Union, one that actively defends civic space and ensures no one is left behind.

In light of the public consultation and the drafting of the upcoming EU Civil Society Strategy, we are proposing the following recommendations:

1. Pillar engagement

The EWL supports the European Commission's ambition to foster deeper, more meaningful engagement with civil society organisations working across a broad spectrum of EU policy areas. This includes strengthening an inclusive and resilient civic space at the European, national, local, and grassroots levels. To achieve these goals, we propose the following recommendations:

1.1. Centre civil society in EU governance:

Civil society organisations, particularly those working on women's rights and gender equality, continue to face barriers to participation at both the EU and national levels. Despite their vital contributions to democratic governance and social progress, many CSOs, especially smaller and grassroots organisations, operate with limited staff and resources, often on a project-by-project basis. The lack of access to core grants/operational grants results in periods of total lack of funding, forcing organisations to let go of specialised staff, lose valuable expertise, and contributing to widespread burnout and chronic stress across the sector. They are also excluded from availing of funding opportunities due to complex processes that are embedded in accessing EU funding, including requirements for financial stability. Applicant must have stable and sufficient resources to successfully implement the projects and contribute to their share.

RECOMMENDED ACTIONS:

- **Institutionalise civil dialogue:** Embed structured civil dialogue as a core element of EU and national policymaking. This must go beyond ad hoc consultations and ensure sustained, meaningful engagement.
- **A shift from consultation to partnership and co-creation:** Recognise CSOs not only as stakeholders, but as strategic partners in the design, implementation, and monitoring of policies. Their inclusion is vital to safeguarding democratic values and ensuring participatory governance.
 - **Inclusive law-making:** CSOs must be involved throughout all phases of policymaking, from agenda-setting and drafting to implementation and evaluation. This includes establishing mechanisms that guarantee access to key decision-makers (e.g. ministries, parliaments), and enable CSOs to influence legislative outcomes based on their expertise and field experience
 - **Protect evidence-based policymaking:** Safeguard policy processes from political interference. Prevent political agendas from overriding CSO input, particularly in areas such as violence against women and girls (VAWG), reproductive rights, sexual education, and anti-discrimination measures

- **Strengthen monitoring of civic space:** Integrate robust civic space indicators into the EU's Rule of Law and Charter of Fundamental Rights reporting frameworks, which should be guiding forces for engagement. The EU must monitor and report on the condition of civic space, making sure organisations are not being unfairly burdened or targeted.

1.2. Enforce legal and policy frameworks:

CSOs continue to face major obstacles to meaningful participation, such as short consultation timelines, limited access to information, and a lack of transparency. In many cases, participation processes serve merely symbolic purposes, with little demonstrable impact on final decisions. These issues are compounded by fragmented and inconsistent engagement practices across EU institutions. The absence of a coordinated framework and the presence of conflicting approaches across institutional bodies leave many CSOs uncertain about when and how to participate effectively.

RECOMMENDED ACTIONS:

- **Codify civil dialogue within EU governance structures:**
 - **Adopt a common EU-level definition of CSOs** to ensure uniform recognition and engagement across all institutions
 - **Conclude an inter-institutional agreement** between the European Commission, the European Parliament, and the Council of the EU to formalise and harmonise civil dialogue across all stages of the policy. Such an agreement should build on Article 11 TEU² and the Conference on the Future of Europe's recommendations³
 - Enhance institutional support by equipping the Commission, Parliament, Council and national offices with adequate staffing, training and funding to facilitate sustained CSO engagement.
 - Each institution should appoint a dedicated civil society liaison officer to streamline interactions, support cross-cutting issues, offer guidance, and build long-term, trust-based relationships.
 - Especially enhance vertical engagement between the Commission and CSOs by appointing a dedicated liaison officer in each Directorate-General (DGs) to maintain consistent interaction across policy areas.
 - Ensure that CSOs are an integral part of EU Advisory bodies, for example, the good practice of the Advisory Committee on equal opportunities between women and men.
 - **General Framework for effective participation of CSOs:**
 - Define clear stages for civil dialogue during each phase of the policy cycle to ensure that engagement is structured and not ad hoc.
 - Allow enough time to provide meaningful input. As democratic organisations, CSOs consult their base to ensure evidence-based, bottom-up input; these democratic processes require adequate time.
 - Develop an easy-to-access/user-friendly digital platform to integrate CSO voices into EU democratic processes in a structured and accessible way.

² Art 11 of the Treaty on European Union ([TEU](#))

³ [Conference on the Future of Europe: report on the final outcome](#), May 2022

- Guarantee transparency and open access to key documents and processes, including consultations, draft proposals, agendas, person in charge, and timelines for participation.
- Use inclusive language and provide accessible formats to reduce linguistic, digital, or administrative barriers to participation.
- Ensure inclusive participation, including those working in women's rights and gender equality organisations and by proactively engaging underrepresented and marginalised CSOs, such as disabilities, migrants, etc.
- Establish earmarked funding to support CSO participation, with transparent, user-friendly grant-making procedures and timely communication of results.
- **Implement a participatory monitoring and feedback mechanism:**
 - Enable CSOs to track how their input is reflected in policy decisions.
 - Require institutions to respond to civil society contributions, explain follow-up actions, and clarify when recommendations are not adopted.
 - Support ongoing evaluation of both the engagement process and the adoption of the recommendations to enhance its inclusivity and effectiveness.

1.3. Specific measures to support and encourage participation in policy-making:

There is no binding EU-level legal obligation that guarantees civil society space at the national level. This results in widely divergent practices across Member States, ranging from consistent engagement in some countries to complete exclusion in others. CSOs' input is too often ignored or only selectively considered, undermining trust and weakening democratic representation.

In many Member States, CSOs, especially those representing marginalised communities and advocating for democracy, the rule of law, and fundamental rights, are the only voices defending these principles. Yet, in the absence of a binding EU framework, engagement remains subject to the political will of national authorities, creating inconsistency and reinforcing structural inequalities.

RECOMMENDED ACTIONS:

- **The Commission should enforce recommendation (EU) 2023/2836⁴** to ensure meaningful and accountable participation of CSOs in national policymaking processes. This recommendation provides concrete measures and a common framework aimed at protecting, supporting and empowering CSOs across the EU.
- **Draw on existing good practices, expertise, and successful models** from across the EU to promote inclusive, innovative, and effective approaches to civil society participation.
- **Promote civic education and public awareness:** encourage Member States to invest in civic education and public campaigns that highlight the role of CSOs in democratic governance, fostering a culture of participation and respect.
- **Strengthen monitoring and accountability mechanisms:** develop EU-wide tools to monitor Member States' engagement with civil society.
- **Link civic space indicators to EU funding conditionality:** ensure that access to EU and national funding mechanisms is tied to respect for EU values, democracy, equality, human rights and the rule of law, including the protection and promotion of civic space, democratic participation, and fundamental rights.

⁴ [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.

2. Pillar protection

The EWL supports the European Commission's ambition to protect civil society organisations, including women's rights defenders, from political repression, legal harassment, shrinking civic space and on/off line harassment and abuse, which can lead to CSOs pulling out of these spaces. Protection must go beyond reactive measures, it must include proactive strategies to counter backlash, intimidation, and anti-rights narratives. To reinforce the resilience and safety of civil society actors, the EWL presents the following recommendations.

2.1. Reframing the narrative on Civil Society:

The EWL emphasises the urgent need to transform how civil society engagement is understood and communicated. Civil society organisations are too often portrayed as “administrative burdens”, financial liabilities, or reputational risks.⁵ Such characterisations distort public perception, undermine trust, and erode political will to support these essential democratic actors.

Restrictive legislation, including attempts to label CSOs as “foreign agents,” has emerged in several Member States, threatening the legitimacy and safety of human rights defenders. Such measures jeopardise pluralistic democracy and violate EU values.

RECOMMENDED ACTIONS:

- **Decision makers and institutions at the EU and national level must create an enabling environment for civil society.**
 - o The EU and its Member States hold both a mandate and a responsibility to act as **standard-setters and enforcers**, grounded in international and regional human rights frameworks. All restrictions to civic space and barriers to action must be removed, and freedom of association, assembly and expression must be guaranteed at any time in all civil matters in accordance with Articles 11 and 12 of the Charter of Fundamental Rights of the European Union⁶
 - o **Particular attention must be given to** organisations representing marginalised communities, including migrants and refugees, anti-racism organisations, and those defending women's rights and gender equality
 - o **Publicly and consistently speak out against** attacks, smear campaigns, and disinformation targeting civil society, particularly those defending democracy, human rights, and gender equality
- **Improve transparency and communication about the role of civil society:**
 - o **Clearly articulate how CSOs contribute to policymaking**, the expertise they offer, their funding structures, and their value in promoting inclusive, evidence-based decisions

⁵ Secretariat-General, Directorate-General for Budget Legal Service: [Guidance](#) on funding for activities related to the development, implementation, monitoring and enforcement of Union legislation and policy

⁶ Art. 11 and Art. 12 of the Charter of Fundamental Rights of the European Union ([CFR](#))

- **Launch EU-wide public awareness campaigns** to counter harmful narratives that portray CSOs as self-interested or financially motivated
- **Foster a collaborative environment** involving civil society, academia, independent and public media, and other democratic actors to amplify the voices of CSOs
- **Address funding-related mistrust and negative perceptions:**
 - **Increase transparency**, predictability, and accessibility in EU funding mechanisms
 - **Provide more core and long-term funding**, reducing over-reliance on short-term, project-based grants
 - **Encourage capacity building** and cooperation among CSOs

2.2. Strengthening protection mechanisms for CSO:

Across the EU, civil society organisations, particularly those working on human rights, democracy, the rule of law, and marginalised communities, face increasing challenges that threaten their ability to operate safely and independently. These include restrictive laws, smear campaigns, on/off line harassment and abuse and the criminalisation of humanitarian work. EU-level coordination is weak, emergency support is often inaccessible, especially for smaller organisations, and confidential reporting mechanisms are inadequate or non-existent. Furthermore, there is a lack of follow-up on monitoring Member States' compliance with the Charter of Fundamental Rights, especially when CSOs are excluded and/or labelled as "foreign agents".

RECOMMENDED ACTIONS:

- **Establish a dedicated EU mechanism to monitor the shrinking of civic space:**
 - This mechanism should function through the systematic collection and analysis of alerts, reports, and data from grassroots civil society organisations, independent institutions, and relevant stakeholders. This bottom-up approach ensures the early detection of patterns of concern and provides a nuanced understanding of civic space developments across member states
 - The monitoring mechanism should be operated by EU institutions, ensuring timely responses and enforcement measures against systemic violations
- **Create an EU Framework to safeguard civil society's role in Member States:**
 - Actively encourage Member States to align their national legislation with the Charter of Fundamental Rights and international human rights standards
 - Review and reverse repressive laws and practices that undermine fundamental freedoms, including the freedoms of expression, association, and peaceful assembly
 - Unequivocally condemn the criminalisation of solidarity work by CSOs, and individuals engaged in humanitarian and human rights action, investigate and prosecute
- **Expand EU rapid response mechanisms to address urgent threats:**
 - Introduce confidential reporting channels to report threats and attacks, and document and analyse the environment in which CSOs work
 - Ensure prompt mobilisation of resources, including:
 - Legal assistance
 - Coverage of medical expenses
 - Physical and digital protection measures
 - Psychological support
 - Emergency relocation services
 - A 24/7 emergency hotline to provide immediate assistance

- **Create emergency funding mechanisms** that can be rapidly deployed to CSOs responding to urgent needs.

3. Pillar support

The EWL supports the European Commission's commitment to ensuring sustainable, transparent, and inclusive funding for civil society organisations, particularly those advancing human rights, gender equality, and women's rights. Adequate and accessible funding is not only the foundation of a resilient and sustainable civic space, it is vital to supporting the individuals who drive these organisations and to enabling their continued impact. To reinforce civil society at national, local, and grassroots levels, the EWL puts forward the following recommendations:

3.1. Addressing Funding Gaps and Political Threats to Financial Support:

Civil society organisations, especially grassroots activists and marginalised communities, face growing financial insecurity and political repression, as authoritarian-leaning governments deploy intimidation tactics, restrict access to funding, and suppress collective mobilisation and advocacy efforts. This situation is further aggravated by recent attempts to limit or defund EU support, often justified under the guise of mitigating "reputational risk" or responding to political pressure within the European Parliament.

Such measures threaten the independence and sustainability of civil society and undermine democratic participation by weakening organisations that hold power to account. Many CSOs operate under chronic underfunding and understaffing, forcing them to scale back or shut down. These outcomes disproportionately benefit anti-rights actors and erode the civic infrastructure vital to a healthy democracy.

In recent years, we have also observed a tendency to provide large funding programmes (for example, the Daphne programme) which encourage bigger CSOs to engage in re-granting mechanisms (to their members). The requirements for re-granting can be burdensome, as they necessitate additional resources to manage and meet co-funding requirements, among other things. Subsequently, the core work of CSOs (defending rights) could be jeopardised. Therefore, a co-created, simplified, easy-to-access funding mechanism should be developed.

RECOMMENDED ACTIONS:

- **Establish clear principles for civil society funding:**
 - **Collaborative design:** Funding programmes should be co-created with CSOs to ensure that priorities and mechanisms reflect their expertise and lived experience.
 - **Streamlined procedures:** User-friendly, simplify application, reporting, and monitoring processes to reduce administrative burdens, with a focus on:
 - Ensuring the accessibility of funding for small and medium-sized CSOs, particularly those operating at the grassroots level or with marginalised communities, often facing structural barriers in accessing support.

- Reviewing and adapting eligibility criteria that may unintentionally exclude or disadvantage grassroots organisations, provided they uphold EU fundamental values.
- **Flexible and sustainable models:** Prioritise core, long-term operational funding to support the independence and resilience of civil society actors.
- EU and national policies should **remove regulatory and fiscal obstacles to access funding and donations**, including across borders, and facilitate cross-border philanthropy.
- **Monitoring and Accountability Mechanisms:**
 - Establish independent monitoring bodies to oversee the implementation of funding programmes.
 - Include transparent evaluation criteria and public reporting on funding allocations and outcomes.
 - Create feedback loops with CSOs to assess programme effectiveness and adapt accordingly.
- **Ensure adequate financing in the new Multiannual Financial Framework (MFF):**
 - **Increasing Operating Grant (OG) funding:**
 - Move beyond project-based and result-oriented models by increasing flexibility in OG management.
 - Recognise advocacy as an eligible activity across all OG programmes.
 - Harmonise and reduce co-funding requirements to ensure broader accessibility.
 - Strengthen capacity-building and learning components, particularly for grassroots and gender-focused CSOs.
 - Introduce re-granting mechanisms across all OG programmes, but lighten the administrative burden to further expand models such as the Citizens, Equality, Rights and Values (CERV) and the Daphne programme.
- **Provide targeted and sustainable support for women's rights organisations**
 - Substantially **increase funding for women's organisations** to counterbalance the backlash on women's rights, services, advocacy, grassroots initiatives, evidence-based research, and feminist activism
 - **Guarantee meaningful participation of civil society and women's organisations in National Reform Programmes**, with accessible funding for inclusive and participatory engagement at all stages.
 - Strengthen financial support for **women's rights within the EU's external actions**, ensuring consistent commitment beyond EU borders
 - Enforce **European values and fundamental rights as a funding condition**, withholding funds from countries that refer to civil society organisations as '*foreign agents*'⁷

Conclusions

A strong, inclusive, resilient and sustainable civil society where all actors, regardless of size or sector, can operate freely, safely, and effectively is essential to the democratic fabric of the European Union.

⁷ See: <https://www.parlament.hu/irom42/11923/11923.pdf>, proposed legislation in Hungary under the auspices of the 'Sovereignty Protection Office', on the funding of NGOs (non-governmental organisations) and (some) media.

Achieving this vision requires clear political will, strategic leadership, and sustained commitment at all levels of governance.

The forthcoming EU Civil Society Strategy presents a crucial opportunity to translate the Union's commitment to civic space and participatory democracy into concrete action. To meet the scale of the challenges facing civil society today, the Strategy must set out ambitious and actionable measures to guarantee a safe, enabling, and sustainable environment for civic actors across the EU, and to restore trust between institutions and citizens through meaningful and inclusive dialogue.

An open, diverse, and vibrant civic space is not a given, it is a public good that must be actively protected, promoted, and renewed. The European Women's Lobby stands ready to contribute to and support the implementation of a transformative Civil Society Strategy.