Contribution ID: 17ad9421-659a-4280-bf1b-d504b0162de1

Date: 05/09/2025 15:42:15

# EU Civil Society Strategy - Open Public Consultation

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

\*I am giving my contribution as:

International level

Transnational level

Regional or interregional level

National level

EU level

	Individual
	Civil society organisation
•	Network/umbrella organisation for civil society organisations
	Academic or research institute
	Business association
	Company/business
	Consumer organisation, including passenger rights' organisations
	National human rights institution or equality body
	Network of national human rights institutions or equality bodies
	Public authority in EU Member State (municipal, local, regional or national level)
	Public authority (EU level)
	Public authority non-EU Member State
	International organisation
	Trade union
* At whi	ch level do you primarily work?

## The role of civil society organisations in the European Union

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	•	0	0	0	0
* Advocating for policy change and defending fundamental rights and other common values, such as democracy and the rule of law	•	0	0	0	0
* Delivering services and support to communities and individuals, including victim assistance and support	0	•	0	0	0

* Acting as watchdogs and promoting transparency, accountability, and good governance	•	0	0	0	0
* Strengthening social cohesion	0	0	•	0	0
* Strengthening societal resilience and crisis preparedness	0	•	0	0	0
* Strengthening democratic participation, and civic engagement	0	•	0	0	0
* Accompanying the implementation of EU policies	0	0	0	•	0
* Other	0	0	0	0	•

lf Other, please specif	lf	Other,	please	specify	V
-------------------------	----	--------	--------	---------	---

1500 character(s) maximum

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

1500 character(s) maximum

Civil society organizations in the EU play a vital role in making policies and services inclusive, governments and public institutions accountable, and social care services effective being grounded in real needs and provided with experts with lived experience. They represent diverse groups — including people who use drugs, migrants, Roma, LGBTQ+ individuals, and people living with HIV — whose life is criminalized and voices are often marginalised in public discourse. CSOs deliver essential services where governments fail, fill gaps in healthcare access, and support communities facing criminalisation or stigma. Organisations like EHRA and its partners conduct evidence-based advocacy, monitor state obligations, engage in cross-border initiatives, and promote rights-based approaches. At EU level regional networks linking national and grassroots organisations from across regions and countries to EU policy processes. Through platforms such as the Civil Society Forum on Drugs and direct engagement with the European Commission, EHRA channels community expertise into EU strategies, legislative debates, and funding frameworks, ensuring that marginalised populations are represented in decision-making. Civil society also acts as a democratic safeguard — exposing policy failures, resisting regression, and contributing to EU values such as human dignity, equality, and rule of law. Especially in times of political backlash, CSOs remain a buffer.

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

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.

	Very high	High	Neutral	Low	Very low	Do not know	
--	--------------	------	---------	-----	-------------	-------------------	--

* Restrictive legal framework/legal barriers (disproportionate legislative restrictions concerning the freedom of association, access to information, loss of charitable/public benefit status etc.)	•	0	0	0	0	•
* Legal action / strategic lawsuits against public participation (SLAPPs)	0	0	•	0	0	0
* Criminalisation of the work of civil society organisations	0	0	•	0	0	0
* Subjection to disproportionate or burdensome fines	0	0	•	0	0	0
* Administrative barriers (burdensome registration processes, excessive administrative requirements or controls)	0	0	•	0	0	0
* Suspected surveillance (e.g. by law enforcement)	0	•	0	0	0	0
* Verbal threats and attacks against civil society organisations offline and online (e.g. online threats or harassment, disinformation)	0	•	0	0	0	0
* Negative media reports/campaigns	•	0	0	0	0	0
* Physical threats and attackes (e.g. vandalism of premises or property, physical attacks against employees/volunteers)	0	•	0	0	0	0
* Limits on access to information	0	0	•	0	0	0
* Censorship (e.g. the suppression of public communication, other information by public authorities)	0	0	0	0	0	0
* Limited or inflexible funding, funding cuts	•	0	0	0	0	0
* Operational challenges (e.g. staffing, use of digital tools, cybersecurity, lack of specialised knowledge /training)	0	•	0	0	0	0
* Legal fragmentation within the EU and difficulties to operate in other EU Member States (e.g. due to lack of recognition, administrative burden, etc.)	•	0	0	0	0	0
* Other types of challenges (if aware, please provide examples below)	0	0	•	0	0	0

If relevant, please provide an example in accordance with the above identified challenges 1500 character(s) maximum Several EU and candidate countries have introduced or debated restrictive laws targeting civil society. In Hungary, the 2023 law gave authorities powers to assess whether NGOs act "in the public interest," chilling civic engagement despite no formal "foreign agent" label. Slovakia imposed disproportionate financial disclosure rules for foreign-funded NGOs in 2025, triggering concerns of indirect stigmatization. In Poland, anti-NGO rhetoric and "LGBT-free zones" undermine inclusive civic space. In Bulgaria, far-right parties repeatedly proposed "foreign agent" legislation, while in Montenegro and Serbia draft laws echoing Russia's model were introduced or politically promoted. Civil society groups in these countries report surveillance, exclusion from policy dialogue, and reputational attacks. These trends weaken health and rights-based services for vulnerable populations such as people who use drugs, migrants, and LGBTQ+ persons. https://ehra.s3.eu-central-1. amazonaws.com/78192342-cd12-4a69-801c-bf536871c343.pdf

#### If other types of challenges, please provide examples

1500 character(s) maximum

Access to sustainable funding remains severely limited for smaller or marginalised groups, while EU cross-border operations face fragmentation in legal recognition and financial rules. This disproportionately affects transnational work, such as harm reduction and HIV services for migrants or criminalised populations. Policy Brief: "Decriminalize! Drug use and possession for personal use" https://community-boost.eu/resources/policy-brief-decriminalize-drug-use-and-possession-for-personal-use/ Policy Brief: "Advancing Universal Health Coverage for People Who Use Drugs in Europe" https://community-boost.eu/resources/policy-brief-advancing-universal-health-coverage-for-people-who-use-drugs-in-europe/

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

1500 character(s) maximum

Civil society organisations (CSOs) are a cornerstone of democracy, pluralism, and accountability. They amplify the voices of marginalised groups, deliver vital services, and defend rights where governments fall short or actively repress. In the EU and candidate countries, CSOs are often the only actors reaching criminalised or stigmatised communities — such as people who use drugs, migrants, or LGBTQ+ individuals — with life-saving harm reduction, health, and legal support. Protecting CSOs means safeguarding the public's right to participate in policymaking, to access evidence-based information, and to challenge abuses of power. It is also essential for achieving EU strategic goals in public health, social inclusion, and democratic resilience. When civil society is under threat, the most vulnerable lose representation first. The EU must not only defend CSOs under attack, but actively enable their meaningful and sustained participation — especially for grassroots and community-led groups who are closest to affected populations. United for Change: Advocacy Strategy for Comprehensive Health and Harm Reduction Services for People Who Use Drugs in Europe https://community-boost.eu/resources/united-for-change-advocacy-strategy-for-comprehensive-health-and-harm-reduction-services-for-people-who-use-drugs-in-europe/

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

O No

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

Based on the work of EHRA, civil society organisations working specifically in harm reduction and drug policy advocacy face particular challenges and risks that set them apart from other CSOs. These organisations operate in a highly contested and often stigmatized field, where political and social opposition is common. They face restrictive laws and legal environments that criminalize or delegitimize their work, including accusations of being foreign agents or even accomplices to drug trafficking. This leads to increased legal harassment, smear campaigns, and challenges in securing funding, which is often cut or restricted, forcing many CSOs into survival mode. Furthermore, harm reduction CSOs encounter difficulties accessing decision-makers and influencing law and policy due to political resistance and bureaucratic complexity. Their work is deeply intertwined with marginalized populations, like people who use drugs, who face high stigma and social exclusion, increasing the risks to CSOs in providing services and advocacy. These risks include harassment, violence, and discrimination not only from authorities but also from societal backlash. The shrinking civic space and increasing criminalization of activism in this area put these organisations at greater risk than others. Joint Rise and Decriminalise Movement emphasize the need for legal protections, sustainable funding, and international solidarity to safeguard the space for these civil society in CEECA region.

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

- Significantly improved
- Somewhat improved
- Stayed the same
- Somewhat worse
- Much worse

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

1500 character(s) maximum

Over the past five years, civil society in several EU Member States has experienced increasing pressure through restrictive legal reforms, growing administrative burdens, and political stigmatization. Laws mimicking "foreign agent" regulations have been introduced or debated in some EU and neighboring countries, targeting organisations that receive international funding or work on rights-based issues. Community-led and advocacy-based organisations—particularly those working with people who use drugs—face growing exclusion from public funding mechanisms and policy consultations. As highlighted in the 2023 CSFD case study report, CSOs in Greece and Hungary report deteriorating relations with authorities and reduced opportunities to influence drug policy decisions. Moreover, shrinking access to EU and national funds due to co-funding requirements and short-term project cycles further weakens the stability of grassroots organisations, especially those operating transnationally. As EHRA report MAPPING REPRESSION: LEGAL TRENDS IMPACTING CIVIL SOCIETY IN CEECA stated "Foreign agent' laws inspired by Russia's 2012 model have proliferated across multiple countries in the CEECA region, imposing strict registration, reporting, and penalties on NGOs receiving foreign funding. Additionally, censorship of harm reduction efforts and crackdowns on LGBTQI+ visibility threaten public health, human rights, and social progress https://harmreductioneurasia.org/news/mapping-repressions)

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

Very effectively
Somewhat effectively
Not very effectively
Not at all effectively
Do not know
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)
Legal protections for freedom of association, assembly and expression
Access to predictable, transparent and sustainable funding
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)
Protection from threats, harassment or attacks
Public recognition and awareness of civil society organisation's work
Impact assessments on the impact of laws on civil society organisations
National policies or strategies on civil society
Other

In your view, how effectively does your country support an enabling environment for civil society organisations

## Dialogue / Participation

to operate freely and independently?

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

Yes. there are multiple consultative bodies consist of non-governmental organizations supporting development of the governmental decisions.

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

Yes. Several mechanisms exist at EU level to engage civil society organisations, including the Civil Society Forum on Drugs (CSFD), and consultations organised through the European Commission's "Have Your Say" platform. CSFD, for instance, brings together national and regional organisations from across Europe to provide input into EU drug policy — though its influence on legislative and funding decisions remains limited. The European Economic and Social Committee (EESC) also serves as an institutional interface with organised civil society, although participation by grassroots and community-led organisations remains a challenge. Moreover, public consultations launched by the European Commission (e.g., on the EU Civil Society Strategy, Health Union, AMIF) enable CSOs to contribute, but often present barriers such as complex language, short deadlines, or lack of follow-up. Smaller CSOs and those representing marginalised populations (e.g., people who use drugs, migrants) are underrepresented and require targeted support to ensure equitable participation.

\* 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

Establishing dedicated participation frameworks that include feedback loops, clear influence on policy cycles, and co-creation processes — not just public comment periods. Creating thematic civil society panels (e.g. on health equity, migration, drug policy) with rotating representation and direct links to relevant Directorates-General (DGs). Funding participation, including travel and preparation costs for CSOs outside capital cities or from stigmatised populations.

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

1500 character(s) maximum

In all policies concirning lives of people and communitites, their health, security and wellbeing the civil society need to be involved in: Agenda setting: Civil society should be consulted as governments set their policy priorities, and should contribute transparently and constructively. Policy drafting: Civil society should be actively and genuinely involved in formulating policy drafts, engaging professionally and collaboratively, and ensuring that policies are grounded in health, human rights, care and support, instead of criminalisation and securitisation. This also includes the development of EU-level policies and strategies, particularly amidst concerns about the opaque nature of the process to develop the new EU Drug Strategy in 2025. Implementation: Civil society, in particular community organisations should take part in implementing drug policies, and be allocated sufficient and sustainable funding to do so, while remaining transparent and accountable in their operations. Monitoring and evaluation: Civil society should contribute to assessing policy impacts in a skilled and meaningful way, holding governments accountable whenever needed and supporting professional evaluation practices. Protection: Governments should repeal any laws that may violate freedom of association, expression and access to health information, and ensure that recourse mechanisms are in place for civil society and community organisations facing threats or attacks.

#### **Protection**

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

Existing measures of civil society protection are not enough. Unfortunatelly in CEECA region authoritarian and nationalist trends are driving a coordinated rollback of human rights and civic freedoms across the region. "Foreign agent" laws, modeled on Russia's framework, have now been adopted or proposed in over a dozen countries, stigmatizing and penalizing organizations receiving foreign funding. Meanwhile, at least seven countries have enacted or debated "drug propaganda" laws that criminalize the dissemination of factual, life-saving harm reduction information. In parallel, censorship targeting LGBTQI+ issues is spreading through both formal legislation and informal political pressure, undermining freedom of expression and visibility. While some countries — particularly in the European Union (EU) and Western Balkans — continue to uphold legal protections for civil society and vulnerable groups, the overall regional trajectory is deeply concerning. These developments not only erode democratic governance and access to public health, but also isolate local civil society from international support and cooperation.

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

While some measures exist at EU level to protect CSOs at risk, they remain fragmented, underfunded, or difficult to access. For example, the European Democracy Action Plan (EDAP) and the Rule of Law Mechanism include provisions to monitor threats to civic space, but they rarely result in concrete protection or rapid response for CSOs facing repression or attacks. The https://protectdefenders.eu/ initiative offers support to human rights defenders, including relocation and legal aid, but it is primarily geared toward individuals rather than organisations, and not well known in the health or drug policy sector. Some EU-funded programmes (e.g. via CERV, AMIF, EU4Health) include protective elements such as institutional funding, legal support, or networking platforms, but access is often limited by administrative burden or short-termism. There is currently no comprehensive EU-level protection system specifically tailored to CSOs operating in politically sensitive fields (e.g. drug policy, migration, or minority rights), despite clear demand and increasing threats across multiple Member States.

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	0	0	•	0	0
* 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.)	•	0	0	0	0
* Strengthen the role of National Human Rights Institutions to protect civil society organisations	0	•	0	0	0
* Specific protection measures for civil society organisations facing threats at EU level	0	•	0	0	0
* Funding for civil society organisations promoting democracy and common values	•	0	0	0	0

* Funding for civil society for protection measures, including legal, cyber, physical and psychological protection	•	0	0	0	0
* Funding for capacity building and training of civil society organisations, including on holistic protection	0	•	0	0	0
* Work with international organisations to strengthen the protection for civil society organisations	0	0	•	0	0
* Reinforce regular dialogue with civil society organisations at national level	0	0	•	0	0
* Support to EU Member States to put in place participation frameworks for civil society organisations	0	•	0	0	0
* Reinforce regular dialogue with civil society organisations at EU level	•	0	0	0	0
* Facilitate cross-border activities of civil society organisations in the EU	0	•	0	0	0

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 move beyond monitoring and adopt a more proactive protection framework for CSOs at risk. Recommended measures include: • Establishing an EU-wide rapid response mechanism for CSOs under attack — modelled after https://protectdefenders.eu/ but adapted to include organisations (not only individuals) and thematic fields such as drug policy, migration, or minority rights. • Creating a dedicated EU protection fund that can provide emergency legal support, digital and physical security upgrades, staff relocation support, and psychosocial services — with simplified access procedures for small or marginalised CSOs. • Strengthening transparency and enforcement mechanisms within EU funding instruments to ensure governments cannot discriminate against critical or rights-based CSOs in national-level fund distribution. • Mandating human rights and civic space impact assessments for all EU legislation and funding programmes, including feedback from CSOs most at risk. • Facilitating anonymous or protected reporting mechanisms where CSOs can confidentially raise concerns about harassment, defunding, or political repression, linked to the EU Rule of Law toolbox.

### **Funding**

•	*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.)

- Very important
- Important
- Moderately important
- Slightly important
- Not important
- Do not know / no opinion

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

- Yes, it is generally transparent and accessible
- It is somewhat transparent and accessible, but improvements are needed
- No, it lacks sufficient transparency and accessibility
- I am not aware of how funding is managed
- Do not know / No opinion

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

1500 character(s) maximum

Several structural and political barriers continue to prevent civil society organisations — especially those working with criminalised or marginalised communities — from fully benefiting from public funding. These barriers result in the systematic underfunding of exactly those CSOs most essential for equity, participation, and rights-based service delivery: • Lack of institutional/organisational funding and support to advocacy work for regional and national organisations representing populations in need • Co-funding requirements remain one of the largest obstacles for grassroots CSOs. Many EU programmes (e.g. AMIF, EU4Health) require 20–40% co-financing, which smaller organisations cannot secure. • Short-term and project-based funding cycles undermine sustainability and increase precarity for staff. Multi-annual core funding is extremely limited. • Excessive administrative burden, including complex reporting systems, digital platforms, and procurement rules, excludes smaller or community-based CSOs that lack professional grant-writing teams. • Political bias and non-transparent selection processes in some Member States lead to exclusion of CSOs that are critical of national. • Limited access to information and capacity-building about available funding opportunities, particularly among organisations led by people who use drugs. • Language barriers, especially for regional or grassroots organisations not operating in English or the official EU languages.

- \* 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)?
  - Yes
  - Improvements are needeed
  - No, there are barriers
  - Do not know / No opinion

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

1500 character(s) maximum

No — existing funding mechanisms, both at EU and national levels, largely fail to support smaller, grassroots or marginalised community-based CSOs. As a result, the voices of communities most affected by inequality, repression, and poor health outcomes remain structurally underfunded — despite their proven effectiveness and deep field expertise. These organisations face multiple systemic barriers: • Eligibility criteria and administrative capacity requirements exclude many community-based groups that lack legal registration, audited financial histories, or fluent English-speaking staff. • Short deadlines and complex application processes deter participation from under-resourced organisations, particularly those led by migrants, people who use drugs, Roma, or sex workers. • Even when funding is technically available (e.g. via CERV or

EU4Health), calls for proposals are often misaligned with the real needs of affected communities, or narrowly define "innovation" in ways that marginalise peer-led or harm reduction work. • National-level grant-making processes often prioritise politically aligned organisations and exclude critical or rights-based groups. • In many cases, grassroots CSOs rely entirely on shrinking international donor support, with no sustainable access to public funds.

#### **Contact**

**Contact Form**