

Submission to the Call for Evidence for the EU Civil Society Strategy

4. September 2025

The global crisis of democratic legitimacy and the regression of the rule of law are straining political systems worldwide, with particularly severe effects in fragile democracies. The COVID-19 pandemic, Russia's war against Ukraine, the influx of disinformation, and a broader authoritarian resurgence have all accelerated this deterioration, pushing civic space into a downward spiral. Enlargement countries, already constrained by weak institutions and geopolitical pressures, have proved especially vulnerable. These weaknesses leave civic actors more exposed to repression, co-optation, and marginalisation. Without a dedicated and context-sensitive approach to civil society in these countries, the EU risks weakening one of the few remaining sources of democratic resilience.

Today's civil society organizations in enlargement countries are tomorrow's European Union's civil society partners. Their early, continuous and structured engagement in policy-making cycle strengthens the knowledge pool of enlargement countries, increases legitimacy of policy-making process and fosters socialization, value alignment, and institutional readiness necessary for full democratic integration.

The upcoming EU Civil Society Strategy, therefore, should look beyond EU member states and include the role of civil society in enlargement countries¹. Failing to recognize and

¹ There is already a positive practice with the Guidelines for EU Support to Civil Society in the Enlargement Region, but this has not been reflected in some related EU-wide policies. In DG NEAR, DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021–2027 (European Commission, June 2022) <https://enlargement.ec.europa.eu/system/files/202210/EU-Guidelines-for-Support-to-Civil-Society-in-the-Enlargement-region-2021-2027.pdf> accessed 6 August 2025; 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 (OJ L 349, 20.12.2023, pp.3–11) <https://eur->

empower civil society in candidate and potential candidate countries would undermine the legitimacy of the enlargement policy and weaken the EU's role as a defender of democracy, human rights, and the rule of law in the enlargement region. We therefore propose a set of recommendations centered on the recognition of civil society in enlargement countries as a reform driver; its protection and the safeguarding of freedoms; the securing of sustainable, predictable, and transparent funding; the ensuring of meaningful participation in policy and accession processes; and its embedding in the monitoring of the Strategy.

Recognising civil society in enlargement countries as a reform driver

1. The Strategy should recognize civil society in enlargement countries as a systemic actor and a contributor to the legitimacy and sustainability of countries' political, societal and economic transformations, including their EU accession process. Civil society actors are drivers of democratic reform, watchdogs of political commitments, trusted voices in policy dialogue and equal partners with governments. They help ensure that reforms are rooted in societal needs and accountable to the public.
2. Supporting civil society in enlargement countries means investing in the next generation of European civic actors. Their early and continuous engagement fosters socialization, values alignment, and institutional readiness necessary for full democratic integration.² The Strategy

lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023H2836 accessed 6 August 2025.

² Monica Ciobanu, 'Impaling Dracula: How EU Accession Empowered Civil Society in Romania' (2010) 42 *Communist and Post-Communist Studies* 59; Petr Kopecký, Simona Piattoni and Eva K. Kubátová (eds), *At the Crossroads of Europeanization and Professionalization: A Cross-Country and Cross-Policy Analysis of Organized Interests in CEE in Exploring Organized Interests in Post-Communist Policy-Making* (Routledge 2015); Nieves Pérez-Solórzano Borragán, 'EU Accession and Interest Politics in Central and Eastern Europe' (2004) 5 *Perspectives on European Politics and Society* 441; Simona Kukovič and Tina Pavič, 'The Impact of the EU Accession

should commit to targeted, long-term support for civic actors, including efforts to strengthen ties between civil society in enlargement countries and EU-based networks and institutions, to foster a truly integrated democratic space.

Protecting civil society in enlargement countries and safeguarding freedoms

3. The Strategy must condemn all forms of hostility, attacks, intimidation, and delegitimization targeting civil society, explicitly including those in enlargement countries. In recent years, civic actors across the enlargement region have faced restrictive legislation³, smear campaigns, politically motivated inspections, criminal charges, SLAPPs⁴, surveillance⁵, funding restrictions, and sustained efforts to discredit their role in public life.⁶
4. The Strategy should openly call on enlargement governments to end such repressive practices and require the EU to apply strict conditionality in accession negotiations and financial assistance when these obligations are not met.

Process and EU Funding on the Professionalization of National Interest Groups: The Slovenian Case' (2021) 11 Interest Groups & Advocacy 154.

³ For example, the “foreign agents” style laws. In Human Rights Watch, ‘Foreign Agent Laws in the Authoritarian Playbook’ (19 September 2024) Human Rights Watch; Commissioner for Human Rights, ‘Bosnia and Herzegovina: The Authorities of Republika Srpska Should Repeal the Foreign Agent Law’ (28 February 2025) Council of Europe.

⁴ Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (‘Strategic lawsuits against public participation’) [2024] OJ L, 2024/1069.

⁵ For example, Amnesty International, Serbia: “A Digital Prison”: Surveillance and the Suppression of Civil Society in Serbia (Report, 16 December 2024) Index No. EUR 70/8813/2024.

⁶ BCSDN, Regional Report on the Enabling Environment for Civil Society Development 2024: Western Balkans and Türkiye (Monitoring Matrix Report, May 2025) <https://balkancsdn.net/novo/wp-content/uploads/2025/07/63-3-MM-Regional-Report-WBT-2024-FINAL.pdf> accessed 6 August 2025; BCSDN, ‘Key Insights from the 2025 Rule of Law Report’ (BCSDN Analysis, 17 July 2025) <https://balkancsdn.net/bcsdn-analysis-key-insights-from-the-2025-rule-of-law-report/> accessed 6 August 2025.

5. The Strategy should introduce additional or reinforce existing policies and tools, such as early warning systems, human rights defenders' mechanisms and emergency support⁷, in order to assist civil society when facing reputational or legal attacks and ensure that the freedoms of peaceful assembly, association and expression are effectively protected. It is critical that such mechanisms are explicitly extended to civil society actors in enlargement countries, so they can rely on the same safeguards as their counterparts in EU Member States when facing reputational or legal attacks, hence adjusting to the Union's practices.
6. The Strategy should explicitly recognise and mitigate the risks posed by government-organised non-governmental organizations (GONGOs) by defining "civil society" as independent from state or party control, committed to upholding the public interest and accountable to citizens⁸, and by ensuring that EU support is directed only to organisations that meet clear standards of independence and transparency.
7. We welcome the commitment to document regressions in enlargement countries through Progress Reports, as well as the Rule of Law and Fundamental Rights Reports. However, while the Rule of Law Report currently covers four accession countries⁹ and the Fundamental Rights Report only three¹⁰, both should be extended to include all enlargement countries. In parallel, support and recognition must be given to civil society-led independent monitoring from

⁷ European Civic Forum, European Civil Society Strategy Report 2022 (European Civic Forum, May 2022)

https://civic-forum.eu/wp-content/uploads/2022/05/European-civil-society-strategy-report-2022_European-Civic-Forum.pdf accessed 12 August 2025.

⁸ Reza Hasmath, Timothy Hildebrandt and Jennifer Y J Hsu, 'Conceptualizing Government-Organized Non-Governmental Organizations' (2019) *Journal of Civil Society* 15

⁹ European Commission, 2025 Rule of Law Report – Communication and Country Chapters (8 July 2025) https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters_en accessed 12 August 2025.

¹⁰ 2025 Fundamental Rights Report (European Union Agency for Fundamental Rights, 2025) <https://fra.europa.eu/en/publication/2025/fundamental-rights-report-2025#country-related> accessed 12 August 2025.

enlargement countries, as an indispensable complement to official reporting.

8. Civil society in enlargement countries should be explicitly recognized as a frontline actor in operationalizing the Democratic Shield. The Strategy should examine mechanisms to extend the benefits of the ECBA Directive¹¹ to candidate countries, or to establish a similar streamlined legal status for their cross-border associations, which would significantly enhance their ability to participate in the EU civic space. The Strategy should call upon the governments in enlargement countries to standardize the legal grounds and streamline the process of establishing a non-governmental organization while also ensuring a conducive environment for their further functioning.

Securing sustainable, predictable and transparent funding for civil society in enlargement countries

9. Looking ahead to the next MFF, and in line with the gradual integration approach, the Strategy should advocate for the inclusion of civil society from enlargement countries in the new AgoraEU programme for culture, media, and civil society¹², while also ensuring continued access to other regular funding streams in education, research, and innovation¹³.
10. Given the expected restructuring of the enlargement funding under the Global Europe instrument in the next MFF¹⁴, the Strategy must

¹¹ European Parliament, 'Proposed Directive on European Cross-Border Associations' (June 2025) <https://www.europarl.europa.eu/legislative-train/theme-delivering-together-and-preparing-our-union-for-the-future/file-cross-border-activities-of-associations> accessed 22 August 2025

¹² European Commission, EU Budget 2028–2034: Commission Proposes New "AgoraEU" Programme for Culture, Media and Civil Society (17 July 2025) <https://culture.ec.europa.eu/news/eu-budget-2028-2034-new-agoraeu-programme> accessed 12 August 2025.

¹³ Such as Erasmus+, Horizon Europe, MSCA, EIC etc.

¹⁴ European Commission, The Road to the Next Multiannual Financial Framework 2028–2034 COM(/-) (Communication to European Parliament and Council) https://eur-lex.europa.eu/resource.html?uri=cellar:7e530836-6311-11f0-bf4e-01aa75ed71a1.0001.02/DOC_1&format=PDF accessed 12 August 2025.

ensure that enlargement funds continue to provide dedicated, accessible, and core financial support for independent civic actors. We strongly urge setting aside and clearly earmarking a specific portion of the enlargement budget exclusively for civil society legally established in the enlargement countries, rather than allowing these resources to be absorbed into broader or more general funding envelopes and with extended geographical eligibility criteria. Such dedicated funding will also help sustain grassroots actors and prevent the overconcentration of resources in larger civil society organisations.¹⁵

11. With global funding cuts widening the gap for civil society¹⁶, the EU must recognize this reality and guarantee dedicated support to organizations defending democratic values. The Strategy should consider enabling civil society organizations from enlargement countries to access funding under instruments other than the IPA, such as the Growth Plan, the EIP, and the WBIF¹⁷ (assuming

¹⁵ European Commission, DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region: 2024 Assessment, Regional Assessment Report 2024 (European Commission 2024).

¹⁶ Several major donor countries have recently announced or implemented significant cuts to their foreign aid budgets, signalling a broader retrenchment in international development financing. In the United States, the Senate approved an \$8 billion reduction in foreign aid as part of a sweeping package of federal spending cuts (<https://www.aljazeera.com/news/2025/7/17/us-senate-approves-cutting-billions-in-foreign-aid-as-trump-demands>). Similarly, the Netherlands has committed to structural spending cuts amounting to €2.4 billion in development aid starting in 2027, citing a renewed focus on Dutch national interests (<https://www.government.nl/latest/news/2025/02/20/minister-reinette-klever-dutch-interests-at-the-heart-of-development-policy>). The United Kingdom plans to reduce its aid allocation to 0.3% of gross national income from 2027, marking a further departure from its previous 0.7% commitment (<https://commonslibrary.parliament.uk/uk-to-reduce-aid-to-0-3-of-gross-national-income-from-2027/>). In Switzerland, the federal parliament approved reductions of CHF 110 million for the 2025 budget and CHF 321 million for the 2026–2028 financial plan, affecting both bilateral and multilateral cooperation (<https://www.news.admin.ch/en/nsb?id=103982>). France has also announced a significant cut, with a €700 million (US\$820 million) reduction (about 16%) in its official development assistance budget for 2026 (https://donortracker.org/policy_updates?policy=france-cuts-oda-by-us-820-million-in-2026-budget-2025). These national-level decisions are echoed in broader trends identified by the OECD, which projects a drop in global ODA of between 9% and 17% in 2025, following a 9% decline in 2024. The long-term outlook for development aid remains highly uncertain, raising serious concerns about the future of international solidarity and support for low- and middle-income countries (https://www.oecd.org/en/publications/2025/06/cuts-in-official-development-assistance_e161f0c5/full-report.html).

¹⁷ [Request from specialized Western Balkans Civil Society Organizations for their formal participation in the new Western Balkans Investment Framework's good governance mechanism](#). More on: WB6 CSO Open Letter to the EU Institutions (Cooperation & Development Institute, 15 September 2021)

these instruments remain under the new MFF), particularly in areas like human capital development, digital transformation, and the social dimensions of the green transition, while acknowledging that such access should be limited to interventions compatible with the nature of civil society work.

12. The Strategy should promote local ownership by ensuring that EU funding frameworks create fair opportunities for locally rooted civil society organizations. We have observed that EU support often reinforces a closed ecosystem dominated by large international agencies and consultancies, leaving local actors sidelined as passive recipients rather than genuine partners.
13. Enlargement funding mechanisms should be reformed to better address local needs through greater flexibility, less reliance on framework agreements, and more tailored, transparent, performance-based approaches. As candidate countries near membership, the EU should earmark CSO-specific budget lines in projects to directly link their expertise to policy outcomes and strengthen sectoral knowledge.
14. The Strategy should also encourage enlargement countries to develop models for sustainable and credible support for civil society, with substantial state funding based on merit and competition, shifting from a project-based to a programmatic approach.¹⁸ Such funding must be accompanied by robust safeguards to ensure empowerment rather than co-optation, including guarantees against political interference, transparent allocation procedures, diversified resources to avoid overreliance, and independent fund management. This recommendation complements the safeguards outlined in Recommendation 6 by ensuring that state funding models reinforce, rather than undermine, the independence of civil

<https://cdinstitute.eu/wp-content/uploads/2021/09/WB6-CSO-s-Open-Letter-to-the-EU-Institutions.pdf> accessed 6 August 2025.

¹⁸ Goran Forbici and Monika Kostanjevec, Comparative Analysis of Systems of Public Funding of Civil Society Organisations (Macedonian Center for International Cooperation, 2016)

<http://www.centaronline.org/userfiles/files/publikacije/comparative-study-civil-society-in-the-western-balkans.pdf> accessed 6 August 2025.

society and prevent the misuse of resources by GONGOs.

Ensuring meaningful civil society participation in policy and accession processes

15. The Strategy should promote the structured participation of civil society in sector policy, accession-related decision-making and monitoring processes. We welcome the growing opportunities for civil society inclusion at the EU level, such as through participation in frameworks like the EESC,¹⁹ or at the accession level, in the governance of IPA III²⁰. However, more systematic and consistent engagement is needed.
16. The Strategy should promote the structural inclusion of civil society in each country's accession process, encouraging respect for existing national models of participation and applying political pressure, principally on the governments, where formal mechanisms are absent or ineffective.²¹
17. Assuming these instruments remain under the new MFF, the Strategy should explore opportunities for greater civil society involvement in programming, monitoring and oversight across EU financing frameworks beyond IPA, such as the

¹⁹ E.g. Enlargement Candidate Members (ECMs) initiative is a landmark step to involve representatives of civil society organisations from EU candidate countries in its advisory work. More on: European Economic and Social Committee (EESC), Enlargement Candidate Members' Initiative (EESC website, September 2023) <https://www.eesc.europa.eu/en/initiatives/enlargement-candidate-members-initiative> accessed 22 August 2025.

²⁰ IPA III (and previously IPA II) provides a legal basis for CSO participation (Regulation (EU) 2021/2236, Arts 7 and 10), though practice varies across countries. In Commission Implementing Regulation (EU) 2021/2236 of 15 December 2021 laying down specific rules for implementing Regulation (EU) 2021/1529 of the European Parliament and of the Council establishing an Instrument for Pre-accession Assistance (IPA III) [2021] OJ L 450/7.

²¹ Civil Society in the Western Balkans: Involvement in the EU Accession Negotiation and EU Integration Processes (Comparative Study, Centre for Democracy Foundation, 2025) <http://www.centaronline.org/userfiles/files/publikacije/comparative-study-civil-society-in-the-western-balkans.pdf> accessed 6 August 2025.

Growth Plan²², the EIP, and the WBIF²³. If these instruments are restructured under the Global Europe framework, meaningful participation of civil society should be ensured in the design, implementation, and monitoring at the pillar, programme, and action levels. Recent experience shows that Reform Agendas in accession countries were rushed through emergency procedures with minimal civil society involvement. Without enforceable rules for participation, EU funds risk bypassing local accountability altogether.

18. The Strategy should recognize and encourage civil society involvement in EU policy consultations by committing to grant enlargement countries' civil society access to the anticipated Civil Society Platform²⁴, and by exploring the extension of eligibility for submitting petitions to the European Parliament and participating in the European Citizens' Initiative.

Embedding civil society from enlargement countries in Strategy monitoring

19. The Strategy itself should establish a clear and transparent monitoring mechanism to track its implementation and impact. Civil society organisations, including those from enlargement countries, must be integral to this process.

²² The Regulation provides a legal basis for civil society participation, but it remains to be seen how effectively this framework will be utilised in practice. In 1 Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 establishing the Reform and Growth Facility for the Western Balkans [2024] OJ L 1449/1.

²³ See n17.

²⁴ EESC, Opinion of the European Economic and Social Committee on EU Strategy to Support, Protect and Empower Civil Society (SOC/840-EESC-2025, adopted 17 July 2025, Bureau decision 28 April 2025) <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/eu-strategy-support-protect-and-empower-civil-society> accessed 15 August 2025.

On behalf of:

- Albanian Institute for International Studies (AIIS)
- Association of Companies for Professional Rehabilitation and Employment of Persons with Disabilities of the Republic of Serbia
- ASTRA – Anti Trafficking Action
- Asylum Protection Center
- Balkan Civil Society Development Network
- Balkans Group
- Belgrade Centre for Security Policy (BCSP)
- Belgrade Open School
- Bujanovac Committee for Human Rights
- Center for Policies and Reforms (CPR)
- Center for Promotion of Civil Society
- Center for Research, Transparency and Accountability (CRTA)
- Center Science and Innovation for Development (SCiDEV)
- Centre for European Security Studies (CESS)
- Centre of Policy and Legal Reform (CPLR)
- Coalition All for Fair Trials
- Committee for Human Rights Niš (CHRIN)
- Connecting Europe
- Cooperation and Development Institute (CDI)
- ESTIMA
- Europe Foundation
- European Network of Migrant Women
- European Policy Centre (CEP-Belgrade)
- European Policy Institute (EPI)
- Eurothink – Centre for European Strategies
- Foundation BFPE for a Responsible Society
- Georgian Institute of Politics (GIP)
- Georgia's Reforms Associates (GRASS)
- Group for Legal and Political Studies (GLPS)
- Human Rights Centre ZMINA
- Hungarian Helsinki Committee
- Institute Alternative
- Institute for Democracy "Societas Civilis"
- Institute for Democracy and Mediation (IDM)
- Institute for European Policies and Reforms (IPRE)
- Institute for Political Studies (IPS)
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- Institute of Communication Studies (ICS)
- Institut für Europäische Politik e.V.
- Istituto Affari Internazionali (IAI)
- Kosovar Centre for Security Studies (KCSS)
- Kosovar Civil Society Foundation (KCSF)

- Lawyers' Committee for Human Rights (YUCOM)
- Lobby in the Public Interest
- Macedonian Center for International Cooperation (MCIC)
- Macedonian Institute for Media (MIM)
- Metamorphosis Foundation for Internet and Society
- National Convention on the European Union (NCEU)
- Network of Progressive Initiatives
- Network of the Committees for Human Rights in Serbia (CHRIS)
- NGO World and Danube
- Organization BIOGEN
- Our Rule of Law (ORoL)
- Südosteuropa-Gesellschaft e.V.
- Turkey Human Rights Litigation Support Project
- UNECOOP
- University of Sarajevo's Faculty of Political Science
- Youth Initiative for Human Rights
- YUROM Center