



# Enabling Civic Space: CONCORD's Recommendations for the new EU Civil Society Strategy

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**Civil society is essential to democracy, peace, well-being, and sustainable development.** The EU defines civil society organisations (CSOs) as non-State, not-for-profit, non-partisan, and non-violent structures through which people organise to pursue shared political, cultural, social, or economic objectives, at all levels from local to global.<sup>1</sup> Thanks to their diversity and multiple roles, CSOs are key partners in addressing global challenges and shaping inclusive and effective EU policies. They provide expertise and critical analysis to inform policy-making, deliver essential services, foster innovation, and give a voice to socially excluded and underrepresented groups.

Yet in recent years, restrictive laws, smear campaigns, dis- and misinformation against civil society, extreme discourses against human rights, gender equality and civic space, and challenges to democracy and the rule of law have intensified globally, including inside the EU. Civil society is increasingly facing attacks that seek to discredit its work and limit its access to funding.

Today, in the European context, we are facing what has been experienced by CSOs in other regions for some time. Shrinking civic space is a global challenge that requires a coherent internal and external response from the EU. This is best illustrated by the effects of the cuts from USAID that have been devastating for CSOs around the world, including inside the EU,<sup>2</sup> and which have particularly affected democracy, human rights and gender equality programmes and projects. Funding gaps have pushed organisations to stop their projects in countries and on priorities where they are needed the most. At EU level, several Member States are following the trend and cutting their Official Development Assistance (ODA). This affects a whole ecosystem of civil society in the sector of international cooperation, especially local CSOs in partner countries.

In this complex, interconnected context where civic space and democracy are at stake around the world, **CONCORD welcomes the European Commission's decision to include a Civil Society Strategy as part of its 2025 work programme. It is a crucial moment to protect civic space globally**, ensure funding for CSOs, build democratic resilience and promote an enabling environment for CSOs, as a strategic investment for peace, stability and well-being. There are several compelling reasons why **the new EU civil society strategy must address the global dimension of civic space:**

### *1. Legal obligation and policy coherence:*

The EU has a clear legal obligation to engage in dialogue with civil society, both internally and externally, as established in Article 11(2) of the Treaty on European Union. This provision creates a constitutional requirement for civil society engagement across all EU action. In external relations, this obligation is further reinforced by the EU's legal framework, including the NDICI Regulation (2021/947) and the recently adopted Samoa Agreement. These legal foundations are supported by key policy commitments, such as the OECD DAC Recommendation on Enabling Civil Society and the EU's 2012 Communication on the Roots of Democracy, which continue to be relevant and complementary to the new Civil Society Strategy, and outline the EU's approach to civil society in external action. To ensure legal consistency and policy coherence, the new strategy must fully reflect these obligations and commitments.

### *2. Global challenges require integrated solutions:*

The growing attacks on civil society follow strikingly similar patterns across regions and are part of a broader anti-rights agenda aimed at weakening democracy and human rights worldwide. The recent surge of anti-NGO narratives within Europe echoes tactics used in other parts of the world, underscoring the need for a unified, global strategy that addresses both internal and external dimensions rather than siloed strategies. In addition, recognising that the EU's actions internally have an impact externally, protecting civil society actors inside the EU helps to legitimise the role of civil society as key actors of democratic systems, and in doing so indirectly provides important support for civil society in EU partner countries.

### *3. A strategic opportunity for EU leadership:*

The funding gaps created by USAID and Member State cuts present a strategic opportunity for the EU to demonstrate global, political leadership in supporting civil society, democracy and the rule of law at a critical moment. It is an opportunity for the EU to invest in long-term change, and to promote its values and a vision of the world that is democratic, just, inclusive and sustainable. In addition, the credibility of the EU as a fair, reliable, consistent international partner aiming at mutual interest and aligning with a rules and rights-based multilateralism, lies in its capacity to demonstrate a strong support to the rule of law, human rights and open democratic and civic space inside the EU and at member states level. This is also true for the EU enlargement process that is based on incentivising reforms in candidate countries including in the areas of governance, rule of law and fundamental rights.

#### *4. Moving forward the localisation agenda, for greater impact:*

This is a key moment for the EU to shift power and resources closer to local CSOs and communities, to strengthen resilience, relevance, and long-term impact of its external actions. It is an opportunity for the EU to be bold in the implementation of its commitments, invest in the knowledge, leadership and solutions of those closest to the challenges it seeks to address, and demonstrate its accountability particularly to populations in partner countries that are affected by its external policies. This requires recognising the complementary roles of European CSOs active in international cooperation and local organisations, and supporting civil society partnerships, networking and coalitions.

#### *5. Operational efficiency:*

Bridging the internal and external dimensions and designing integrated solutions allows the EU to avoid fragmentation and parallel systems, and to strengthen the effectiveness of civic space initiatives. This also supports Europe-based CSOs active in international cooperation to contribute to civic space, societal debates and activism in Europe while maintaining their international actions and achieving their long-term objectives, in line with their mandate.

**This paper seeks to complement CONCORD's previous paper "Standing strong in the storm: an EU strategy to safeguard civic space worldwide" <sup>3</sup>, by providing an overview of the context and key trends that affect CSOs today. It proposes a set of key actions per pillar of the strategy as proposed by the European Commission.**

# Protection Pillar

## The EU should:

- **Adopt the definition of CSOs of the EU's 2012 Communication** on the Roots of Democracy<sup>4</sup> (most recently used in the European Commission proposal for the new Global Europe instrument),<sup>5</sup> which not only ensures coherence and consistency between internal and external action, but also provides a broad and inclusive understanding of civil society actors.
- **Use its full toolbox<sup>6</sup> to counter the rise in restrictive legislation around the world**, such as foreign agent laws, anti-money laundering and surveillance legislation, among others, **and to support enabling legal frameworks for civil society**. This requires a coherent internal and external approach as threats are emerging within the EU, from Member States and the European institutions themselves.
- **Renew and fund the Human Rights and Democracy Action Plan** through a dedicated thematic programme in the next Global Europe Instrument, as a key tool to support an enabling environment for civil society and a rights-based agenda in EU external action.
- **Denounce human rights violations, including attacks to women's rights and bodily autonomy, and signs of shrinking civic space wherever they occur**, regardless of it being inside Member States or in any other part of the world. Protecting human rights, democracy and civic space must not be sidelined in the new geopolitical context through the prioritisation of economic interest; they are central to peace and stability. Civic space, an enabling environment for civil society, and the protection of human rights and democratic principles **must be integrated in political and policy dialogues with EU partner country governments, involving local CSOs**.
- **Explore strategies to counter mis- and disinformation and anti-democratic narratives targeting civil society** from different sectors, together with CSOs. This not only supports an enabling environment for civil society, but also gives visibility to the impact of the work that the European Union supports through civil society actors.
- **Strengthen the EU System for Enabling Environment** by giving a clear mandate to EU Delegations and relevant services at headquarters to react to early warnings by civil society using the full EU toolbox, and by linking it closely to an EU internal monitoring, alert and protection mechanism.
- **Systematically integrate civic space protection clauses in all international agreements** (trade, etc.), with verification mechanisms, complaint procedures accessible to CSOs, and clear consequences in case of non-compliance.

- **Ensure that the restructuring of EU Delegations does not worsen dialogue and access to funding for local CSOs.** It is essential to keep a decentralised approach to ensure context-specific actions, and to safeguard the position of CSO and human rights focal points and the CSO roadmaps which are crucial to take forward the EU's commitments to CSO engagement in external action. **In addition, the EU should explore how CSO roadmaps could be strengthened** through an intersectional lens, to support diverse civil society actors who may be affected differently by restrictions.
- **Continue efforts to ensure that EU protection mechanisms are adapted to the specific challenges faced by women human rights defenders (WHRDs)** and that they are accessible to them. The EU should, through these protection mechanisms, protect and support, including politically and financially, WHRDs.

## Engagement Pillar

### The EU should:

- Build on and learn from existing frameworks and tools, such as the 2012 Communication on the roots of democracy and the CSO roadmaps in partner countries and **meaningfully<sup>7</sup> engage with CSOs at all levels, in Brussels and in partner countries; in particular by facilitating the engagement of local CSOs in partner countries.**
- **Standardise guidance and methodologies for inclusion of civil society and provision of information** throughout programming and project cycles, including Global Gateway, to ensure quality, inclusive engagement with CSOs and promote positive outcomes and/or prevent negative impacts on populations affected by the EU's external policies and investments. This requires, inter alia: (i) improving public access to information on Global Gateway and TEIs via a standardised and user-friendly public portal that includes for each project: all actors involved (including who is responsible for oversight), the funding source/financing tools and amounts mobilised, stage of implementation, key milestones, as well as a contact point; and (ii) publishing methodology and evaluation to explain choices for project selection and finance allocation, in particular allocation of EFSD+ (European Fund for Sustainable Development Plus) guarantees.

- **Proactively engage with representatives of marginalised groups**, reaching out beyond the “usual suspects” to include local CSOs, women’s rights organisations and feminist movements, CSOs outside of capitals, organisations representing indigenous people and people experiencing intersectional discrimination. This requires a comprehensive mapping of organisations and their expertise across sectors, as well as proper financial resources.<sup>8</sup>
- **Create support programmes for Southern CSO participation** in global fora including financing their participation, capacity strengthening components, and special attention to marginalised groups and CSOs from countries with closed or threatened civic space.
- **Institutionalise meaningful, safe and inclusive civil society engagement mechanisms in bi-regional agreements**, following up on the work started with civil society in the context of the EU-CELAC and AU-EU partnerships, including by supporting CSO-led, independent and permanent spaces of exchange and joint prioritisation between CSOs across continents.

## Support Pillar

### The EU should:

- Unequivocally support the role of civil society actors worldwide as watchdogs and critical voices that contribute to informed, effective, and inclusive policy-making and should **explicitly include advocacy activities as a legitimate use of EU funding** in the relevant internal and external programmes of the MFF 2028-2034. Public funding is key to support civil society’s independence and to ensure inclusive engagement spaces and mechanisms especially for minorities and groups suffering from discrimination and marginalisation. **Access to funding is a precondition** for the EU to meet international and regional standards on freedom of Association and Peaceful Assembly, and to fulfill its Treaty obligation to engage with civil society.<sup>9</sup>
- Take actions to **fill strategic gaps** left by budget cuts by USAID and EU Member States, both in terms of support to civil society and to the areas most affected (human rights and democracy, gender equality).<sup>10</sup>
- In line with the most recent guidance of the OECD DAC,<sup>11</sup> **strengthen coordination with multiple actors on civic space** such as partner countries, multilateral actors, EU member states and civil society at partner country, regional levels and global or multilateral levels, based on consultations with CSOs.

- **Fund CSOs' ability to build alliances at various levels**, collectively strategise, build capacity and strengthen their responses to regional, national and local level restrictions.
- Acknowledge and support through funding the essential **role of national NGO platforms, regional coalitions, and international networks** in providing coordination, representation, and resilience within civil society ecosystems, particularly where civic space is under pressure.
- Support a stronger integration of global citizenship education (GCE) into formal and informal education systems to foster critical thinking and a culture of engagement and international solidarity. **GCE should continue to be funded** as a powerful tool in efforts to counter antidemocratic trends and other global challenges.<sup>12</sup>
- **Adopt flexible funding mechanisms and risk management approaches** to ensure resources reach CSOs in challenging contexts.<sup>13</sup>
- Develop integrated funding mechanisms that **allow CSOs to work simultaneously on internal and external dimensions of civic space**.
- **Include a standalone civic space chapter** with country-specific recommendations and follow-up mechanisms **in the annual Rule of Law report**, making it an effective accountability and prevention tool.
- Establish **mandatory civic space impact assessments** for all major EU internal and external policies in order to systematically address spillover effects where EU policies affect civic space in the EU or in partner countries.
- **Maintain and expand funding programmes and modalities in the 2028-2034 MFF** that support a diverse, independent and resilient civil society ecosystem. This includes promoting solidarity in these difficult times through direct and flexible core funding and/or program-based support, and sub-granting. At the same time, ease the eligibility criteria and grant requirements to facilitate the engagement of local and smaller CSOs.<sup>14</sup>
- **Guarantee CSO access to funding under indirect management modality and Global Gateway initiatives** by mandating CSO involvement, sub-grants and partnerships with pillar assessed entities.<sup>15</sup>
- **Reinstate clear spending targets in the next MFF**, as they are essential to prevent the dilution of cooperation objectives, ensure predictable and accountable funding, and safeguard priority areas such as climate and biodiversity, gender equality and human development, ensuring that support goes where it is most needed.

# Coordination, monitoring and evaluation

## The EU should:

- Create or strengthen existing internal coordination mechanisms between the European Commission services, such as joint annual strategic meetings between DGs responsible for internal affairs and external relations and the appointment of civic space focal points in all DGs with a coordination platform, with the aim to monitor the implementation of the civil society strategy.
- The implementation of the key actions presented in the strategy should be monitored regularly. A report looking at the quantitative and qualitative results should be published at the mid-term point and at the end of the strategy period as a political stocktaking of the strategy's progress.



# Footnotes:

1. COM/2012/0492 final: [“The roots of democracy and sustainable development: Europe’s engagement with Civil Society in external relations”](#)
2. For more on this issue, see Accountability Lab and Humentum’s [Global Aid Freeze Tracker](#)
3. CONCORD [“Standing Strong in the Storm: an EU strategy to safeguard civic space worldwide”](#), 2023
4. COM/2012/0492 final: [“The roots of democracy and sustainable development: Europe’s engagement with Civil Society in external relations”](#)
5. COM/2025/551 final: [“Proposal for a regulation of the European Parliament and of the Council establishing Global Europe”](#) (Article 2 (8)-Page 20)
6. Such as political, funding and diplomatic levers including public and private diplomacy (statements, demarches, human rights dialogues and civil society seminars, hosting CSOs for meetings, CSO roadmaps, human rights country strategies, flexible and targeted funding to support civil society at national and regional level, among others).
7. What do we mean by meaningful? See CONCORD’s paper [“7 practices for civil society participation in EU decision-making”](#), 2021; see also OECD working paper [“Towards meaningful civil society participation at the international level: Success factors, opportunities and challenge”](#), 2025
8. CONCORD [“Implementing the EU Gender Action Plan III: Turning Ambition into Impact”](#), 2023
9. “Treaty obligation” refers to Article 11(2) of the Treaty on European Union (TEU); “international and regional standards” refers to article 12 of the [Charter of Fundamental Rights of the European Union](#), the 2021 [OECD DAC Recommendation on Enabling Civil Society in Development Co-operation and Humanitarian Assistance](#), the 2024 [report on civil society space](#) by the United Nations High Commissioner for Human Rights, among others.
10. EU SEE [“The Impact of the US Funding Freeze on Civil Society”](#), 2025
11. OECD DAC Toolkit [“Co-ordinating Action for Civic Space”](#), 2025
12. CONCORD [“Global Citizenship Education In Europe: How much do we care?”](#), 2018; CONCORD [“Do we care enough about citizen engagement? A qualitative look at global citizenship education funding in Europe”](#), 2024
13. For more details, see section “Support for CSOs in limited and endangered civic spaces”, p. 20 of CONCORD’s report [“Who holds the lion’s share? A closer look at Global Europe Funds for CSOs”](#), 2023
14. CONCORD [“Stepping up EU international cooperation through the next Multiannual Financial Framework”](#), 2025
15. CONCORD [“Stepping up EU international cooperation through the next Multiannual Financial Framework”](#), 2025



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