

**Opinion of non-governmental organisations
on the documents included in the package
of proposals for the new Multiannual
Financial Framework (COM/2025/570 final,
COM/2025/571 final)**

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Introduction

This opinion was prepared in response to an invitation from the Economic Department of the European Union of the Ministry of Foreign Affairs addressed on 9 September this year to non-governmental organisations through the Council for Public Benefit Activities. **The opinion was prepared in cooperation with various non-governmental circles by nationwide federations and associations of organisations: the National Federation of Non-Governmental Organisations, the Working Community of Social Organisations and the Alliance of Associations Polish Green Network. An informal group of non-governmental and expert organisations, "MFF PL", moderated by the Polish Green Network, was involved in the work on the opinion.**

The opinion concerns the following consulted documents:

- Communication from the European Commission to the European Parliament, the European Council, the Council of the European Union, the European Economic and Social Committee and the Committee of the Regions entitled "A dynamic EU budget for the priorities of the future - Multiannual Financial Framework 2028-2034" (COM/2025/570 final) and
- the European Commission's proposal for a Council Regulation laying down the multiannual financial framework for the years 2028-2034 (COM/2025/571 final).

Due to their horizontal nature, some of our comments refer to more specific decisions announced in the communication and contained in the draft regulations on the monitoring framework or individual proposed funds.



Summary of the opinion

The concept of the new EU budget presented by the European Commission is an attempt to reconcile the various demands raised by EU institutions, Member States, regions, social and economic partners, non-governmental organisations and expert circles. The new architecture and greater flexibility, simplifications and investments in defence and competitiveness are intended to respond to the challenges facing the EU in the areas of defence, security, resilience and competitiveness.

We view many aspects of the EC's proposal positively: the search for new own resources for the Union, the new AgoraEU programme, the harmonisation of indicators and attempts to strengthen the DNSH principle and the partnership principle. At the same time, many of the proposed solutions are highly controversial: lower than recommended levels of climate spending, combined with environmental spending, the lack of funds for the nature protection and restoration, an inconsistent approach to horizontal principles, and the lack of guarantees for the regions' involvement in the preparation and negotiation of National and Regional Partnership Plans.

The increase in the size of the Multiannual Financial Framework is mainly due to inflation and the need to repay NGEU loans, and does not correspond to the real investment needs in the areas of climate, nature, industry and defence. We therefore recommend that Member States not only support the Commission's proposal in this regard, but also seek to increase the budget in order to effectively achieve the EU's objectives.

Our detailed comments are set out below in three sections:

1. Size, architecture and governance of the MFF, including horizontal principles,
2. Environment and climate area,
3. Social area (civil society, social dimension of the MFF)

Each section consists of three parts: issues assessed positively, issues assessed negatively and recommendations.



Size, architecture and governance of the MFF, including horizontal principles

Positive assessments:

- **Simplification and creation of synergies between programmes.** These can be effective mechanisms for increasing the efficiency of fund spending, provided that this does not involve abandoning objectives that are important for social development and cohesion, and does not mean a departure from management standards, which could, for example, undermine the fundamental rights of EU citizens, etc.
- An attempt **to link funds** more effectively than before **to strategies and plans**.
- Appropriate directions for seeking revenue for the EU budget through **new own resources**.
- **The partnership principle:**
 - Declared maintenance of the principle of partnership and multi-level governance for cohesion policy and its extension to the CAP by applying the principle of partnership to all National and Regional Partnership Plans.
 - Extension of the scope of the partnership principle by introducing the recommendations of the European Community of Practice on Partnership Practice (ECoPP) on the inclusion of new groups of partners (e.g. youth organisations), thereby enabling more effective identification of groups affected by European Fund interventions.
- **Implementation of the Charter of Fundamental Rights:**
 - Compliance with the Charter of Fundamental Rights and the strengthening of the conditionality of fund disbursement, making it dependent on compliance with the rule of law, including the proposal to allocate funds lost due to violations of the rule of law to activities related to the protection of democracy and the rule of law, combating corruption and strengthening civil society. If a Member State loses its funding, funds will still be available in programmes that contribute to supporting democracy, the fight against corruption, EU values and civil society.
- **National and Regional Partnership Plans are to take into account the link between the recommendations of the report on the rule of law and specific reforms and/or actions included in them.** This is in line with the demands repeatedly made by organisations (see: [Stefan Batory Foundation Report](#)).
- **Inclusion of respect for working and employment conditions** in horizontal principles. We welcome the provision in Article 6 of the Regulation establishing a framework for monitoring expenditure and implementation of the EU budget and horizontal principles (COM(2025) 545 final), which emphasises respect for working and employment conditions. It ensures that EU funding will support high labour standards rather than undermine them. The introduction of an obligation to monitor expenditure on social policies enhances the transparency and effectiveness of actions. As a



result, EU investments gain a dimension of social responsibility, combining economic development with the protection of workers' rights and reducing precariousness and poverty.

Negative assessment:

- **The increase in the size of the Multiannual Financial Framework mainly reflects inflation and the need to repay NGEU loans.** The size of the Multiannual Financial Framework therefore does not adequately address the enormous investment needs in the areas of climate and nature, as well as various other political and social priorities, such as industrial policy, defence and crisis response, and building social resilience. For this reason, we recommend that Member States not only support the budget proposed by the Commission, but also propose an increase in order to achieve the objectives set. The EU budget announced by the European Commission amounts to EUR 1.98 trillion. However, this figure should be treated with caution, as it refers to current prices, which reflect expected price increases during the 2028-2034 MFF period. In constant 2025 prices, the proposed budget amounts to EUR 1.76 trillion. Converted to 2018 prices, it amounts to approximately €1.44 trillion. Deducting the repayment of NextGenerationEU (NGEU), which will start in 2027, means a reduction of €120 billion to €1.32 trillion (2018 prices). The current MFF amounts to EUR 1.07 trillion, so the actual increase in the EU budget is EUR 250 billion in 2018 prices or around EUR 310 billion in 2025 prices. In relation to the EU's gross national income, the EU budget would increase from 1.13% to 1.26%, or 1.15% after deducting NGEU repayments. However, the proposed budget increase is marginal in light of the end of the Recovery and Resilience Facility (RRF), which, if included in the total expenditure for the current accounting period, would mean a reduction in EU expenditure. Furthermore, the huge increase in spending on industrial policy and defence limits the budget for other priorities, in particular cohesion and agricultural policy.
- **A policy-based budget cannot ignore the territorial dimension of these policies (place-based).** Both elements must be properly balanced and linked to ensure that less developed regions are not left behind.
- We take a negative view **of the voluntary nature of Member States' regional chapters in the NRPPs** (Article 21(2) of the CPR Regulation).
- **Inconsistent approach to horizontal principles.** Inconsistency in the description of horizontal equality principles in the various chapters of the Commission Communication, compounded by additional conceptual confusion in this area in the draft regulation establishing the monitoring framework (sometimes referring only to "gender equality", sometimes to the application of the Charter of Fundamental Rights). We draw attention to the omission in the Commission Communication, but also in subsequent framework documents of 16 July 2025, of the issue of compliance with the United Nations Convention on the Rights of Persons with Disabilities ([including](#) Article 9 Accessibility, Article 19 Independent living and inclusion in society), which were an important part of the framework regulations for the MFF 2021-2027. There have been no changes in EU legislation that justify this omission. Poland has unique *capacity* and ability in this area to propose adequate provisions at the level of common procedures.



- **Horizontal principles:**
 - The partnership principle is limited to the first pillar of the MFF – the NRPPs – and does not cover programmes under direct management. There are also no provisions on financial and organisational support for capacity building of non-administrative partners, including NGOs.
 - The possibility of excluding the principle of partnership in the case of border management (Article 6(5) of the NRRP Regulation). This seems to be a very bad decision, given that reports by international organisations indicate that border management should be properly monitored and subject to public scrutiny. For example, [the Schengen Evaluation of Poland](#) prepared by the European Commission sets out specific recommendations on ensuring compliance with fundamental rights, such as the principle of *non-refoulement*. It is therefore necessary to ensure that the implementation of these recommendations is properly monitored by independent institutions or watchdog organisations (including, for example, the Fundamental Rights Agency).
- **A departure from the specific characteristics of the current Cohesion Fund**, which has so far been manifested in the absence of funding levels (EU contribution) linked to the degree of development of regions, which may hinder the implementation of energy or transport investments that are important for the decarbonisation process in the more affluent parts of Member States.

Recommendations:

- **An evaluation of the RRF** should be carried out to identify the significant difficulties encountered in its implementation, in particular as to whether it is actually possible to achieve results more quickly and effectively in such a management model.
- **Link to strategies and plans:**
 - We recommend further strengthening the integration of the budget planning and programming process with existing strategies and plans at European, national and regional level by effectively linking MFF expenditure to national recommendations under the European Semester and actions planned in strategic documents (National Energy and Climate Plan, National Building Renovation Plan, National Nature Restoration Plan, etc.).
 - National and Regional Partnership Plans should also explicitly include housing strategies (e.g. national housing programmes, regeneration plans) as related documents. Otherwise, there is a risk that EU funds will not effectively respond to the growing housing crisis, and the opportunity to integrate climate policy (energy renovation of buildings) with social policy (combating energy poverty, ensuring affordable housing) will not be sufficiently exploited. A good solution would be to allocate dedicated housing allocations (5-10%) directly to cities and municipalities.
- **Horizontal principles:**
 - The Communication should take into account all the horizontal principles applied to date (in accordance with Article 9 of Regulation 2021/1060 of 24 June 2021), as their long-term implementation has already resulted in the development of certain standards and practices for their application, which



should not be wasted. At the same time, these principles should be defined and applied in a consistent manner in all documents applicable within the 2028-2034 perspective. This will also facilitate their consistent monitoring and evaluation, the creation of appropriate indicators, etc. (e.g. in the context of implementation). In order to properly assess the implementation of horizontal principles, in particular the principle of non-discrimination, it is necessary to expand the scope of data collection and analysis (e.g. in the area of integration of third-country nationals). Indicating that "horizontal priorities will be applied consistently across the EU budget, including in relation to climate and biodiversity, the 'do no significant harm' principle (DNSH principle), social policy and gender equality" is appropriate, but it is important that other horizontal principles are taken into account in a similar manner.

- **Implementation of the Charter of Fundamental Rights:**

- It is necessary to identify verification pathways and institutions to monitor whether the recommendations are being implemented adequately and effectively, and not to limit them solely to the adoption of laws or regulations, but to their actual implementation and enforcement.
- In this context, however, it is important to simultaneously strengthen monitoring systems and their independence (in particular monitoring committees and the principle of partnership).
- In order to ensure that the CFR is actually applied in accordance with the objectives set out in the Communication, it is necessary to develop technical implementation documents (e.g. guidelines, manuals, support materials, etc.) on the practical application of the Charter of Fundamental Rights at the project programming, implementation and evaluation stages. Such documents should be clear and understandable even to those without specialist legal knowledge. The materials currently available are far from sufficient and do not adequately ensure the application of the CFR in the implementation of projects and programmes. They should be developed at Commission level so that the implementation standards are uniform for all Member States. At the same time, it is necessary to secure adequate resources for training both officials and beneficiaries. A good knowledge of the Charter will have a direct impact on the quality of programmes and projects.
- The EC Communication should specify that: "National and regional partnerships will require compliance with the horizontal principles set out in Article 10 TFEU, taking into account the Charter of Fundamental Rights of the European Union. Member States should also comply with the obligations set out in the United Nations Convention on the Rights of the Child and the United Nations Convention on the Rights of Persons with Disabilities, and ensure accessibility in accordance with Article 9 thereof and with Union law harmonising accessibility requirements for products and services. In this context, the Funds should be implemented in a manner that promotes the transition from institutional care to family and community-based care. Member States and the Commission should strive to eliminate inequalities



and promote equality between women and men and to take into account the gender perspective, as well as to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation. The proposed provision (modelled on recital 6 of the Preamble to Regulation 2021/1060 of 24 June 2021) corrects the omission in the Commission Communication, but also in subsequent framework documents of 16 July 2025 on compliance with the United Nations Convention on the Rights of Persons with Disabilities (including Article 9 Accessibility and Article 19 Independent living and inclusion in society), which were an important part of the framework regulations for the MFF 2021-2027. There have been no changes in EU legislation that justify such an omission in relation to one of the most vulnerable groups in the European Union.

- **Partnership principle:**

- We recommend extending the partnership framework set out in the European Partnership Code to the entire MFF – in the programming and implementation of all (content-related) pillars of the EU budget – both those implemented under shared management and those implemented under direct management (in particular: the NRRPs, the European Competitiveness Fund together with Horizon Europe, Connecting Europe Facility, AgoraEU, Erasmus+ and Global Europe), inter alia by indicating the partnership principle as a horizontal principle in the regulation establishing the framework for monitoring EU expenditure and budget implementation and horizontal principles (COM(2025) 545 final).
- We recommend that the recommendations of the ECoPP be fully taken into account, including, in particular, ensuring high-quality participation of non-administrative partners (NGOs, social and economic partners, academia).
- The partnership principle should include financial and organisational support for the development of the capacity of partners outside the administration, including NGOs. For its effective implementation, it is necessary to allocate appropriate resources (a specific percentage of the EU budget) to building the capacity of partners to participate in programming, implementation and monitoring of budget execution.
- Chapter 5 of the Communication (Rule of Law, Fundamental Rights and Protection of the Union's Financial Interests) should take into account the role of Monitoring Committees and partners in ensuring compliance with horizontal principles and monitoring activities.

- **Role of regions:**

- Although the National and Regional Partnership Plans provide for the involvement of regions in the management of a given chapter, they should also be able to negotiate the chapter independently so that regions are not marginalised when key decisions are taken (and thus, *de facto*, the Plans are centralised).
- We recommend strengthening the autonomy of regions by specifying in Article 21(2) of the CPR Regulation that regional chapters are mandatory in those countries where regional programmes were in place for the 2021-2027 period. And in those countries where just transition regions were established,



territorial chapters (or subchapters) covering these regions should be created.

- *Territorial Impact Assessments*, including DNSH and social impact assessments of interventions, should be carried out on the basis of statistical and socio-economic data relating to NUTS3 sub-regions, which will help to better respond to local needs through European Fund interventions.
- In the context of **new own resources**, in view of the obligation to allocate 100% of ETS revenues to green transition measures, we recommend that these revenues be allocated exclusively to climate and environmental measures under the new own resources.

Environment and climate

Positive assessment:

- **Horizontal application of the DNSH principle based on more understandable, uniform guidelines.** In the context of DNSH, the draft implementing regulation (COM(2025) 545 final) implements the proposal of the DNSH Team of the Task Force on Horizontal Principles operating in 2024 under the Polish Partnership Agreement Committee for 2021-2027 (including: *streamlining, shortening and harmonising technical guidelines, Inclusion of the operationalisation of the DNSH principle in the negotiations on the MFF 2028-2034 legislative package*) and partially implements the recommendations of NGO experts (it provides for the creation of coherent, uniform guidelines, but does not specify details on specific sectoral annexes, such as those created for the SCF).
- **Indication of the role of the Natural Resources Restoration Law (NRL)** and National Nature Restoration Plans in fund programming.

Negatively assessed:

- **Combining climate and environmental expenditure into a common 35% pool:**
 - In order to avoid marginalising environmental investments, climate and biodiversity earmarking should be separated.
 - The rather vague description of the possibility of derogation from the climate and environmental targets for the NRPPs (NRPP Regulation, Article 22(2)(r)), according to which the EC may indicate to a Member State a lower or higher percentage than the 43% provided for in the Regulation establishing the framework for monitoring expenditure and implementation of the EU budget and horizontal principles (COM(2025) 545 final) for the NRPPs.
 - The 0-40-100% marker system used in the MFF proposal remains overly simplistic and leads to an overestimation of the positive impact of investments. In particular, the 40% category is imprecise and encourages overstatement of effects. Furthermore, if joint climate and environmental earmarking is maintained (which we do not recommend), it is necessary to at least move away from the approach proposed by the EC, whereby different climate and environmental markers are taken into account at a higher level – it would be more realistic for the impact assessment to take the average



value of the above markers. At the programming stage, the environmental impact assessment of investments should also be extended beyond the marker system alone. It is also necessary to supplement the markers with result and impact indicators that measure the real impact (e.g. area of restored ecosystems, increase in species numbers, reduction in pollution). The monitoring system should be linked to the Natural Resources Recovery Regulation (NRL) and EU strategies (Biodiversity 2030, European Green Deal).

- **The discontinuation of the Just Transition Fund for coal regions**, which threatens to halt or undermine the transition process, reduces the social cohesion of the EU and the competitiveness of coal region economies.
- **The discontinuation of the LIFE programme** could seriously jeopardise the achievement of the EU's nature and climate protection goals. LIFE is the only EU programme dedicated exclusively to the environment, nature and climate, and in many Member States it is the only source of public funding for such projects. Its continuation – in its current form or through a dedicated budget line under future MFFs – is essential to ensure stable and long-term support for environmental investments. In Poland, over 100 projects have been financed under the LIFE programme. Poland is a net beneficiary of LIFE funds. Funds from this programme support issues related to the safety of Polish citizens, among other things, by reducing the risk of climate change consequences such as droughts, floods, fires or heat waves, based on effective and cost-efficient *nature-based* solutions. The European Commission proposes to incorporate the activities of the current LIFE programme into broader financial instruments, which threatens to marginalise it. Part of the programme is to be transferred to the European Competitiveness Fund (limited to clean transition and industrial decarbonisation projects), and the remaining activities to the EU Instrument, a tool supporting transnational projects and responding to crises. Although the EU Instrument provides for the financing of LIFE activities, it does not provide them with a dedicated budget line, which means that they will have to compete for funds with other priorities. The lack of separate funding for LIFE threatens its accessibility and effectiveness. Under the EU Instrument, LIFE has to share a small pool of EUR 11 billion with other Union actions, with no guarantee of allocation.

Recommendations:

- **Introduction of an explicit ban on financing technologies and installations using fossil fuels into the package of regulations.** Funds for the 2021-2027 period (especially after 2025) were to be free from financing fossil fuels and harmful technologies, but there are still loopholes for their actual financing (e.g. the admissibility of gas sources where there is no "economic or technical" possibility of using renewable energy sources). Therefore, the regulations on the implementation framework (COM(2025) 545 final), the NRPPs (COM(2025) 565 final) and the Competitiveness Fund (COM(2025) 555 final) should explicitly state: "No investments or technologies that use or lead to an increase or continuation of the use of fossil fuels shall be eligible for support." This is particularly important in the context of recent political statements by senior EC officials (including Director-General for



Energy Ditte Juul Jorgensen in September 2025) on the important role of fossil gas in the European energy system "for decades to come".

- **Climate and environmental earmarking; implementation of the NRL:**
 - We recommend separating climate and biodiversity (nature) earmarking. This solution will avoid the risk that large infrastructure projects will "consume" a significant part of the allocation, leaving a gap in the financing of nature conservation measures, which has existed for years. This would also make it difficult to achieve the objectives of the Nature Restoration Law (NRL).
 - Expenditure on biodiversity protection should depend on the estimated costs of implementing the NRL (currently being developed by the EC) and should not be less than 10% of the budget. The proposed provisions on the implementation of the Nature Restoration Law should be strengthened by guaranteeing sufficient funds for its implementation.
- **We recommend that the development of citizen and distributed energy be identified as an EU priority**, both in the context of decarbonisation and energy transition, and in terms of building local resilience and energy security (distributed model). The EC communication and regulations should include a direct reference to this model. Citizen and distributed energy should not be treated as one of many types of investment in the energy sector, but as a holistic approach to implementing the EU's strategic priorities for green transition, security and resilience.
- **Maintaining funding for coal regions that will not complete their transition within the current programming period.** It is crucial that the future financial perspective includes a separate envelope at NUTS3 level dedicated to coal regions. It is also very important not to leave behind regions that have not received this support under the current Just Transition Fund (i.e., in Poland, the Turow region and the Lublin Coal Basin with the Bogdanka mine). In these regions, mining will decline dramatically in the coming years, which will lead to job losses. In order for the just transition to continue and for public support for it to be seen not as temporary but as enabling the completion of the process of building a decarbonised economy and creating new jobs, special funding must be maintained.
- **Continuation of the LIFE programme.** In order to ensure the sustainability of the programme and its contribution to the EU's environmental objectives, it is necessary to establish a dedicated budget line in the MFF 2028-2034, supporting not only crisis measures but also long-term investments in climate and nature. We propose that such a budget line be included in the EU Instrument. The LIFE programme should also continue to support activities, including expert activities, carried out by non-governmental organisations.
- **DNSH principle:**
 - Ensuring the participation of independent experts (representing scientific, expert and non-governmental organisations) in the development of guidelines for the DNSH principle
 - Supplementing the DNSH guidelines with detailed sectoral annexes, as currently accompanying the SFK guidelines.
 - Investments in defence and security should not be excluded from the DNSH compliance requirement. Exemptions from the application of DNSH for specific types of investments in the area of crisis response, security and



defence should be described and justified in the DNSH guidelines to be developed by the EC. The priority should be to use 'clean' alternatives and a clearly formulated list of DNSH-incompatible activities that are not eligible for funding.

- **The principle of "energy efficiency first"** is an overarching principle that should be taken into account in all sectors and must be explicitly mentioned in the key Communication, in which it is currently omitted.
- **We recommend including blue-green infrastructure – adaptation and renaturation investments, dual-use NBS investments in investments dedicated to defence and security** in the NRPPs and the European Competitiveness Fund, also as part of support for border regions. Therefore, we recommend removing the derogation from Article 4 of the draft implementing regulation and including defence expenditure in the calculation basis for climate and environmental expenditure. Then, investments in nature-based solutions could count towards defence investments (e.g. re-irrigation) and, at the same time, climate/environmental expenditure. This would allow for the promotion of NBS solutions in investments related to security and defence. At the same time, including expenditure in this area in the calculation basis will force more ambitious and greener investments in other sectors.
- It is also important **to take into account the impact of the housing sector on the achievement of climate goals**. Buildings account for approximately 40% of energy consumption in the EU. Therefore, climate and structural funds should not only support a wave of housing renovations, but also the implementation of low-carbon standards in new housing investments. It seems that the EC is currently placing too much emphasis on the development of new construction as a solution to the housing crisis. Meanwhile, greater emphasis should be placed on renovating existing housing stock. In addition, in the opinion of DNSH, the carbon footprint in construction should be explicitly addressed, covering both operational and material emissions. Furthermore, we point to the need to strengthen mechanisms to combat energy poverty, including through the use of a *gender budgeting* approach, in order to reach the most vulnerable households more effectively.
- **We recommend emphasising the role of green skills, education and combating disinformation**. Supporting skills helps to build competitiveness while supporting the green transition (*clean skills/green skills*) – a direct reference to these types of skills should be included in the EC Communication and regulations and given greater emphasis. Skills should be supported in the so-called "hard" technical and technological dimension and in the so-called *soft skills* (social) dimension. Synergy between the two dimensions is essential. The skills support component should be present in every programme. Skills building must be closely linked to environmental education and education and activities to combat climate misinformation – the educational component should be included horizontally in all activities.



Social area (civil society, social dimension of the MFF)

Positive assessment:

- **Increasing the budget for the CERV and Creative Europe programmes under the new AgoraEU programme, as well as the Erasmus+ programme, with the inclusion of civic education as a priority.**
- **The AgoraEU programme responds appropriately to the challenges** facing contemporary Europe, including the crisis of democracy resulting, among other things, from declining trust in public institutions, expert knowledge and growing divisions and social polarisation. It is necessary to invest both in measures to counteract these trends carried out by civil society organisations and in strengthening these organisations, which are the guarantors of a healthy democracy and the quality of the information space.

Negatively assessed:

- **The abolition of the LIFE programme.** The LIFE programme is an important source of funding for activities, including expert activities in the field of green transition, carried out by NGOs.

Recommendations:

- **We recommend extending the Social Climate Fund until the end of the 2028-2034 perspective.** Due to the high level of energy and transport poverty and their social severity, SCF support should be continued for as long as possible. Extending the SCF will allow for more effective measures to support the decarbonisation of the buildings and transport sectors, while providing long-term support mechanisms for citizens and micro-enterprises in difficult situations who will be affected by the implementation of the ETS 2 system.
- In view of the new challenges facing the EU, as set out in the strategies (e.g. *Preparedness Strategy, Democracy Shield*), including the need to build democratic resilience, prepare societies for crises and civil defence, **the proposed budget for the AgoraEU programme should be maintained and a specific level of earmarking for the CERV pathway should be guaranteed within it, not subject to reductions under the flexibility principle, for beneficiaries representing civil society organisations (CSOs),** paying particular attention to the mechanisms for allocating funds.
- Consideration should be given **to including a separate funding pathway for building democratic resilience, linked to the Democracy Shield,** aimed at supporting civic education, countering disinformation and protecting rights in the digital sphere (a separate Democracy Resilience Fund or a dedicated pathway in AgoraEU).
- **It is very important that crisis response activities do not drain the resources of non-governmental organisations,** as has happened many times in the past. EU documents point to civil society as a resource in responding to emerging threats and crises. However, the needs of organisations supporting Member State institutions in responding to crisis situations, both during and after the intervention, must be properly taken into account. Unfortunately, in the past, despite the fact that



organisations drew attention to these issues, they were not sufficiently taken into account (e.g. in the National Recovery and Resilience Plans).

- It is necessary **to maintain operating grants for civil society entities**, multi-annual grants, organisations intermediating in the distribution of funds to local organisations, and to introduce further simplifications and facilitations for these entities.
- We recommend **moving away from the requirement for own contributions** in EU-funded projects implemented by NGOs.
- It is necessary **to link the MFF in terms of supporting democracy and civil society with the EU strategic documents currently being prepared, including, above all, the EU Civil Society Strategy**, which is **currently being consulted** and should consist of four pillars/areas: *ENGAGE* (structured, systemic dialogue with civil society organisations and their involvement in policy design, implementation and monitoring), *PROTECT* (protection of organisations against attacks, harassment and restrictions), *SUPPORT* (financial and non-financial support for their activities and facilitating the acquisition of funds for their activities), *ENABLE* (creating and promoting the creation of favourable conditions for the functioning of civil society organisations – legal solutions, standards, practice) and the Strategy for Building Social Resilience and Crisis Preparedness and *Democracy Shield*.
- We also recommend introducing (especially into the NRRP Regulation) **rules for granting funding from national envelopes to enable NGOs and other forms of civic activity to actively use European funds**, including enabling regranting (from larger organisations to smaller NGOs and groups). The priority of financing grassroots citizen activities should be explicitly included in the regulation.
- **We propose increasing the level of expenditure on social objectives in national and regional partnership plans from 14% to 20%.** Given the current scale of crises and challenges related to green, digital and demographic transformation, as well as the need to build societal resilience in the context of war and migration, the proposed limit of 14% is far too low. An increase in social spending under the 2028-2034 multiannual financial framework from 14% to 20% is necessary to effectively respond to growing inequalities and social challenges in Europe. The crises of recent years have shown that investment in social cohesion, education and health is crucial for stability and development. Increasing the social spending limit will strengthen the role of civil society and increase citizens' trust in EU institutions. It is an investment in the resilience and solidarity of the entire European Union.
- **We recommend including funds for capacity building of civil society organisations in the European Social Fund.** The inclusion of funding for capacity building of non-governmental organisations in the European Social Fund under the MFF 2028-2034 is crucial for the effective implementation of the Union's social, education and health policies. Stronger and better prepared organisations can respond more effectively to the needs of local communities, support people at risk of exclusion and implement innovative social solutions. NGOs also act as providers of public services that are essential for building the resilience and cohesion of societies. Such support promotes the professionalisation of the sector, increases its impact and strengthens civil dialogue, which is the foundation of participatory democracy.



- **We recommend increasing the level of technical assistance in programmes from 3% to 6% and including funds for capacity building for non-administrative entities sitting on monitoring committees** in the amount of at least 0.5% in order to ensure the effective functioning of these bodies. This will allow for more effective implementation and monitoring of activities and will ensure high-quality substantive input from partners outside the administration.

