

Position paper on the EU Civil Society Strategy

EXECUTIVE SUMMARY

Civil society organisations (CSOs) are indispensable to Europe's democracy, social cohesion, and resilience. They connect citizens with institutions, safeguard rights, and strengthen trust in policymaking. Health CSOs in particular play a unique role: representing patients and professionals, delivering services to vulnerable groups, raising awareness, providing independent expertise, and holding decision-makers accountable for health equity, crisis preparedness, and the protection of the public good.

Yet, their ability to operate is increasingly undermined. Shrinking civic space, unstable funding, and barriers to meaningful participation in decision-making threaten both the vitality of civil society and the strength of public health. The forthcoming EU Civil Society Strategy is therefore a critical opportunity to secure the recognition, resources, and protection health CSOs need.

Key challenges include:

- **Unstable and inadequate funding**
Health CSOs face structural underfunding. EU4Health grants often cover only ~60% of costs, forcing organisations into precarious fundraising and short-term project cycles. The removal of operating grants in 2025, despite signed framework agreements, jeopardises sustainability and disproportionately harms smaller or grassroots organisations. Unlike commercial actors, CSOs rely on predictable EU support to remain independent and fulfil watchdog functions.
- **Barriers to meaningful participation in decision-making**
Despite commitments to participatory policymaking, health CSOs face resource barriers to meaningful involvement and are often asked to contribute through last-minute consultations. Transparency data shows that industry voices dominate high-level EU meetings, distorting policy outcomes and weakening evidence-based measures such as prevention, taxation, and regulation. Without equal footing, health CSOs cannot fully contribute their expertise to safeguard public health or advance the EU's priorities on equity and resilience.
- **Shrinking civic space**
Health CSOs advocating regulation of harmful products are frequent targets of smear campaigns, disinformation, and SLAPP lawsuits. New restrictions on the use of EU funds for advocacy and calls to defund NGOs further threaten pluralism and democratic engagement. While the Anti-SLAPP Directive is a milestone, its impact depends on swift, consistent implementation across Member States.

To restore balance and ensure health CSOs can fulfil their irreplaceable role, the Strategy should:

1. **Guarantee stable, transparent, and predictable funding**
 - Institutionalise multi-annual operating grants under EU4Health and future programmes.
 - Recognise advocacy and watchdog work as eligible for EU support.

- Simplify funding processes with timely calls, proportionate reporting, reduced co-funding rates, and mechanisms accessible to small and grassroots organisations.
- 2. Ensure meaningful access to decision-making**
 - Establish a binding interinstitutional agreement on civil dialogue under Article 11 TFEU.
 - Enforce standards for consultations, including minimum six-week response periods and transparent reporting on how feedback shapes policy.
 - Strengthen transparency registers, publish detailed meeting records, and balance stakeholder engagement.
- 3. Foster a safe and enabling environment for civil society, including protection from undue pressure or reputational harm**
 - Develop an EU-wide protection system offering legal, financial, psychosocial, and digital support.
 - Ensure timely, harmonised implementation of the Anti-SLAPP Directive with clear guidance, awareness-raising, judicial training, and practical assistance for CSOs under threat.

INTRODUCTION

Civil society organisations (CSOs) are vital to Europe's democracy, social cohesion, and resilience. They connect citizens with institutions, safeguard rights, and ensure that policymaking reflects lived experience. Their work strengthens trust in public institutions and legislation, and delivers concrete benefits to communities, particularly the most marginalised.

Within this broader landscape, **health CSOs** play a unique and irreplaceable role. They represent patients, professionals, and communities; deliver communications and services that reach vulnerable populations; mobilise public awareness; and bring independent expertise into policymaking. They also act as watchdogs, ensuring that decision-makers uphold commitments to health equity, crisis preparedness, and the protection of public goods against vested commercial interests.

Yet despite their contributions, health CSOs are increasingly constrained by a shrinking civic space, unstable funding, and limited access to decision-making. These pressures undermine their ability to operate effectively, weakening both public health and democracy.

The forthcoming **EU Civil Society Strategy** offers an important opportunity to address these challenges. An impactful Strategy must provide a coherent, well-resourced framework that guarantees health civil society the space, recognition, and resources it needs to continue its indispensable work.

CHALLENGES FACING HEALTH CIVIL SOCIETY

Unstable and inadequate funding

EU4Health grants have often funded only ~60% of costs, requiring CSOs to match the remaining 40% from their own budgets; this structural co-funding requirement has kept health organisations in a permanent fundraising loop and heightened cash-flow risk, further endangering the continuity and sustainability of their operations. Replacing these with short-term, project-based action grants undermines sustainability, forcing organisations to cut staff, suspend activities, and focus on short-term deliverables over long-term work for systemic change. More recently, the removal of operating grants from the **EU4Health 2025 Work programme** has pushed many health CSOs into survival mode. **This comes despite the fact that thirty organisations had already signed [Framework Partnership Agreements for Operating Grants](#) with the European Commission for 2025-2026, that outlined concrete deliverables to support EU priorities in public health and crisis preparedness.** Operating grants in 2024 accounted for approximately 1% of the total budget of the EU4Health Programme. While the reduction in EU4Health budget could be proportionately felt across the activities, the complete withdrawal of the operating grants disproportionately affects CSOs that depend on this core funding to sustain their essential work. This decision was communicated with significant delays, more than 6 months into the year where funding was expected, and serves as **a case study of political decision-making that undermines the very fabric of civil society engagement in EU health policy.**

This precarious environment is also particularly harmful for smaller or grassroots organisations that lack the administrative capacity to compete in complex calls and absorb payment delays. At national level, many health organisations solely rely on volunteers. Unlike commercial actors who can draw on large reserves or diversified revenue streams, CSOs depend heavily on predictable EU support to

remain independent. The lack of alternative funding sources deepens the asymmetry of resources and represents an existential threat for many health NGOs, preventing them from playing their role as independent watchdogs and advocates for the public good.

Barriers to meaningful participation in decision-making

Despite the EU's commitment to participatory policymaking, **civil society continues to face structural barriers to participate in decision-making processes**. Health CSOs are no exception: **lack of human and financial resources** limits health CSOs' ability to participate in working groups that require substantial technical input and frequent meetings. **Formal contribution to policymaking is too often limited to short consultations with tight deadlines**, sometimes launched during summer or end-of-year holiday periods, with no indication of how consultations' input is translated in real uptake throughout legislative and non-legislative initiatives. Moreover, there remains a significant imbalance between civil society and actors representing commercial interests. **Transparency data shows that industry representatives dominate meetings held by Commissioners, senior officials, and MEPs, overshadowing civil society**. This imbalance distorts the policy environment, with evidence-based measures such as taxation, advertising restrictions, or labelling rules delayed or diluted under industry pressure. Without equal footing and meaningful support, health CSOs cannot fully contribute their expertise to safeguard public health and advance the EU's own priorities on prevention, equity, and resilience.

Shrinking civic space

Across Europe, CSOs face growing hostility. Increasingly, CSOs active across have become frequent targets of **smear campaigns, disinformation, and lobbying efforts designed to discredit their legitimacy** different domains. Moreover, they are increasingly exposed to **SLAPPs** (strategic lawsuits against public participation), with concerning impacts on their work.¹ There is a real risk that such abusive tactics will increasingly be deployed against health CSOs, threatening their ability to hold decision-makers and industry to account. The recent adoption of the Anti-SLAPP Directive (EU 2024/1069) was therefore a crucial step forward, but its success will depend on swift and consistent implementation across Member States, with practical protections that CSOs can rely on.

In addition, recent guidance restricting the use of EU funds for advocacy, coupled with calls driven by some policymakers to defund NGOs, pose a major threat to pluralism, transparency, and democratic engagement. This undermines civil society's *raison d'être*, its capacity to represent citizens, to engage in policy-making processes that are relevant to their communities and to amplify people's voices in matters of public interest, especially when it comes to vulnerable or underrepresented groups.

WHAT AN EU CIVIL SOCIETY STRATEGY MUST DELIVER – EU4Health CSA RECOMMENDATIONS

Stable, transparent, and predictable funding

¹ [The Use of SLAPPs to Silence Journalists, NGOs and Civil Society; Open SLAPP Cases in 2022 and 2023](#)

- **Institutionalise multi-annual operating grants under EU4Health and future MFF programmes**, ensuring that health CSOs can rely on flexible, independent core funding that sustains long-term advocacy and systemic change rather than short-term deliverables.
- **Recognise advocacy and watchdog work** as legitimate activities eligible for EU support, ensuring that CSOs can defend the public interest independently and convey the voice of their communities into policies and initiatives that directly affect them.
- **Guarantee timely, transparent and simplified funding processes**, including predictable and timely publication of work programmes and calls, proportionate reporting requirements, reduction or removal of co-funding rates, and mechanisms to ensure accessibility for smaller and grassroots organisations.

Meaningful access to decision-making

- **Adopt a binding interinstitutional agreement on civil dialogue**, grounded in Article 11 of the Treaty of Functioning of the European Union, to formalise structured and meaningful engagement with civil society across the policy cycle and policy areas.
- **Set enforceable standards for participation to decision-making**. Consultations must never fall entirely within predictable holiday periods, minimum response periods of six weeks must be guaranteed, and feedback reports should transparently show not just the feedback received, but also how different stakeholder inputs were taken into account.
- **Improve transparency** by strengthening transparency registers, publishing detailed notes of meetings, and applying a principle of balance to engagement across different types of stakeholders.

Safe and enabling environment for civil society

- **Create a robust EU-wide protection system for CSOs under threat**, with rapid access to legal aid, financial and psychosocial support, and digital security assistance to counter harassment and smear campaigns.
- **Ensure strong implementation of the Anti-SLAPP Directive (EU2024/1069)**. The Directive is a key step in protecting civic space and public participation: to make these protections meaningful for CSOs, the European Commission must prioritise consistent and timely transposition by the 2026 deadline. This requires issuing clear guidance for Member States, supporting awareness-raising and judicial training, and providing practical assistance such as legal aid and dedicated support mechanisms for organisations under attack.

By adopting these measures, the Strategy can ensure that health CSOs, together with their counterparts across civil society, are empowered to fulfil their role as defenders of public health, rights, and the public good.