

**To:**

Ursula von der Leyen, President of the European Commission  
Olíver Várhelyi, Commissioner for Health and Animal Welfare  
Francesco Serafin, Commissioner for Budget, Anti-Fraud and Public Administration  
Michael McGrath, Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection

Brussels, September 2, 2025

**Subject: Formal Complaint under Art. 228 TFEU & Decision 94/262 - 2025 EU4Health Operating-Grant Procedure**

Dear President Von der Leyen,  
Dear Commissioner Várhelyi, Commissioner Serafin, Commissioner McGrath,

We, the undersigned civil-society organisations holding Framework Partnership Agreements (FPAs) under the EU4Health 2025-2026 Programme, together with the EU4Health Civil Society Alliance, a broad coalition of other health and patient-advocacy CSOs, underscore the indispensable role that health NGOs play in safeguarding public health across Europe, and write to you with deep concern about the continued withholding of operating grants for 2025 and the existential threat this poses to Europe's health-NGO community.

Civil-society organisations have played a central role in promoting health, preventing disease and ensuring that EU health policy reaches citizens on the ground. As agreed in our FPAs, we have delivered outputs, convened experts, mobilised patient networks, and amplified the voices of those at highest risk, all in good faith and on the implicit understanding that our operating grants would follow.

Yet:

- Despite signing valid FPAs in late 2024, no call for 2025 operating grants has been published.
- On 24 April 2025, HaDEA circulated informal "reputational-risk" guidance (Ref. Ares(2025)3314742) requiring repeated work-plan amendments, amendments which we submitted, and which were formally approved and closed on 14 July 2025.
- On 23 July 2025, the Commission finally published its EU4Health 2025 Work Programme, omitting any call or budgetary allocation for operating grants.

This procedural withholding and institutional silence have:

1. **Shattered legitimate expectations** built up by the amendment process itself.
2. **Violated the duty of good administration** (CFR Art. 41, TFEU Art. 296).
3. **Breached transparency obligations** (TFEU Art. 15) and the Financial Regulation's timing rules (Art. 195(4), 188(2)).
4. **Forced NGOs to cover six and counting months of costs unpaid**, with drastic staff layoffs and office closures already under way.

As you are aware, Members of the European Parliament (MEPs) and Members of the Council have expressed their support to civil society, and demanded immediate action. This is not simply a budgetary delay, it is a question of democratic integrity. Civil-society and patient organisations entered into agreements "as openly as possible," planned activities accordingly, and now find themselves stripped of the resources on which they rely.

**These grants, which represented just 1% of the 2024 EU4Health budget, enabled 30 health NGOs to maintain their structural capacity and served for cross-border knowledge exchange, network coordination, public communication, and policy dialogue.** This 1% that the 2025 work programme no longer funds represents the foundations of European public health cooperation. Furthermore, funding NGOs is not only funding the paid team; it is enabling the mobilisation and coordination of thousands of volunteers. **This represents enormous added value that cannot be replicated elsewhere.**

We therefore urge you to:

1. **Immediately publish** the 2025 EU4Health operating-grant call (or, if you intend an alternative route, a fully reasoned, legally grounded decision) so that planning and delivery can resume without further delay.
2. **Restore and guarantee** the provision of operating grants for all FPA holders, acknowledging our essential role in defending public health, and set a clear disbursement calendar no later than 30 September 2025.
3. **Engage a discussion with us** on the vital importance of civil society and patient voices as cornerstones of a resilient, participatory European democracy, to build procedural safeguards in future EU4Health cycles that prevent administrative silence and uphold transparency, participation and good administration.

Withholding funds, especially without explanation, not only undermines trust but risks breaching legal obligations and weakening the very fabric of European cooperation in health policy.

We count on your leadership to rectify this situation immediately and safeguard civil society's vital contribution to European health policy.

Yours sincerely,

Dr Milka Sokolović

Director General of the European Public Health Alliance (EPHA)

Co-Coordinator of the EU4Health Civil Society Alliance

**On behalf of the co-signatory organisations:**

- AIDS Action Europe
- Association of Schools of Public Health in the European Region (ASPHER)
- Association of European Cancer Leagues (ECL)
- Childhood Cancer International - Europe
- Correlation - European Harm Reduction Network (C-EHRN)
- Digestive Cancers Europe - DiCE
- European AIDS Treatment Group (EATG)
- European Alcohol Policy Alliance (Eurocare)
- European Association for Palliative Care
- European Health Management Association (EHMA)
- European Heart Network (EHN)
- European Liver Patients' Association (ELPA)
- European Network for Smoking and Tobacco Prevention (ENSP)
- European Patients' Forum (EPF)
- European Public Health Association (EUPHA)
- European Public Health Alliance (EPHA)
- EURORDIS - Rare Diseases Europe
- Fertility Europe
- Health Action International
- Infectious Disease Alliance
- International Sport and Culture Association (ISCA)
- Lungs Europe
- Psychedelic Access and Research European Alliance (PAREA)
- TB Europe Coalition
- Smoke Free Partnership (SFP)