



Brussels, 10 December 2025
(OR. en)

16709/25

Interinstitutional File:
2025/0550 (COD)

CULT 154	COMPET 1332
AUDIO 139	PROCIV 186
FREMP 387	HYBRID 178
CODEC 2111	DISINFO 114
IA 229	JAI 1899
JEUN 253	SERVICES 87
EDUC 501	POLGEN 236
CULT HERIT 32	MI 1045
SOC 840	RELEX 1674
GENDER 215	INF 263
DIGIT 272	COPEN 417
DATAPROTECT 339	JUSTCIV 219
ANTIDISCRIM 129	DROIPEN 165
SAN 832	CADREFIN 387
IND 605	FIN 1548

COVER NOTE

From: European Economic and Social Committee
date of receipt: 9 December 2025
To: General Secretariat of the Council

Subject: Proposal for a Regulation of the European Parliament and of the Council establishing the 'AgoraEU' programme for the period 2028-2034, and repealing Regulations (EU) 2021/692 and (EU) 2021/818 [11771/25 - COM 2025 (550) final]
- *Opinion of the European Economic and Social Committee*

Delegations will find attached the opinion adopted by the European Economic and Social Committee on the above proposal.

Other language versions, if needed, will soon be available on the following website: [DM Search v5.5.0](#)



OPINION

European Economic and Social Committee

AgoraEU and Justice programmes

Proposal for a Regulation of the European Parliament and of the Council establishing the AgoraEU programme for the period 2028-2034, and repealing Regulations (EU) 2021/692 and (EU) 2021/818
(COM(2025) 550 final – 2025/0550 (COD))

Proposal for a Regulation of the European Parliament and of the Council establishing the Justice programme for the period 2028-2034 and repealing Regulation (EU) 2021/693
(COM(2025) 463 final – 2025/0255 (COD))

SOC/843

Rapporteur: **Ionuț SIBIAN**

www.eesc.europa.eu

EN

Advisor	Simona CONSTANTINESCU (Advisor to the rapporteur, Group III)
Legislative procedure	EU Law Tracker EU Law Tracker
Referral	Council letter, 1/10/2025 Council letter, 5/11/2025 European Commission, 25/11/2025 European Parliament, 6/11/2025
Legal basis	Article 19(2), 21(2), 24, 167(5), 168(5), 173(3) and 304 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2025) 550 final COM(2025) 463 final
Relevant Sustainable Development Goals (SDGs)	SDG 16
Section responsible	Employment, Social Affairs and Citizenship
Adopted in section	6/11/2025
Adopted at plenary session	4/12/2025
Plenary session No	601
Outcome of vote (for/against/abstentions)	198/2/0

1. RECOMMENDATIONS

- 1.1 The EESC welcomes the Commission's proposal for the AgoraEU and Justice programmes, which are closely in line with the priority of a free and democratic Europe set out in the 2024-2029 EU Strategic Agenda. The Committee expresses its support and invites the European Parliament and the Council to endorse the proposals in the forthcoming negotiations, while underlining that such support should not affect the financial envelope proposed by the Commission.
- 1.2 The EESC encourages the Commission to explicitly recognise in the AgoraEU regulation the role of advocacy as a key part of CSOs' work and the involvement of civil society in policymaking as integral elements of strengthening democratic participation and societal resilience, in line with the programme's general objective.
- 1.3 The EESC calls on the Commission to explicitly introduce operating grants across all strands of AgoraEU to reinforce the institutional resilience of civil society, which is indispensable for safeguarding EU values and fostering democratic participation across the Member States.
- 1.4 The EESC calls on the Commission to allow operating grants to support the programmes of non-profit bodies, networks or institutions pursuing an aim of general European interest in the areas covered by the proposed Justice programme.
- 1.5 The EESC welcomes the Commission's decision to maintain Financial Support to Third Parties (FSTP) through intermediary organisations, recognising it as an effective means of reaching smaller and grassroots organisations. The Committee underlines that ensuring the independence of intermediaries and the compliance of their governance and activities with the EU Charter of Fundamental Rights should be key eligibility criteria in their selection.
- 1.6 The EESC calls for clarity in the regulation on co-financing rates for intermediaries and final recipients. The EESC strongly recommends allowing up to 100% EU financing for civil society intermediary organisations that effectively implement a delegated activity as well as for the grant beneficiaries.
- 1.7 The EESC notes that the mandate of the current Creative Europe Desks has been designed primarily to serve the cultural and creative sectors. In the AgoraEU proposal, however, cross-sector cooperation and innovation are envisaged across the cultural, media and civic fields. The Committee stresses the need to clarify and, where appropriate, adapt the mandate, expertise and human resources of the Programme Desks to ensure that they are able to effectively support stakeholders in all fields covered by the programme.
- 1.8 The EESC calls on the Commission to consider introducing appropriate safeguards in the use of lump sums and multiannual grants – such as indexation, corrective mechanisms or additional flexibility in financial reporting – to ensure that project objectives can be fully achieved without placing undue financial strain on beneficiaries.

- 1.9 The EESC invites the Commission to provide greater clarity on the envisaged synergies between the European Competitiveness Fund (ECF) and the Media+ strand of AgoraEU.
- 1.10 The Committee recommends that the Justice programme explicitly strengthen its focus on victims' rights and access to justice. This should include dedicated funding for victim support networks, training for judicial practitioners and projects enhancing cross-border access to justice and legal aid.
- 1.11 The EESC calls on the Commission to document and address the intra-EU funding imbalances – particularly the East-West divide for the Justice programme and all three AgoraEU strands, as currently mentioned in the case of professionals in the cultural and creative sectors¹.
- 1.12 The Committee calls on the Commission to ensure that recipients of grants working on similar topics are connected for the purpose of synergies, effectiveness and mutual learning. The EESC invites the Commission to develop a concrete plan of action to make the provisions on combined and cumulative funding in both proposed Regulations operational, thereby ensuring effective high-value synergies between the AgoraEU and Justice programmes. This plan should include the identification of paired topics for joint or back-to-back calls, formalisation of cooperation between the relevant Commission directorates-general for this purpose and regular reporting on shared performance indicators.
- 1.13 The EESC regrets that the legal provision in the current Citizens, Equality, Rights and Values (CERV) regulation establishing a formal Working Group on Civil Dialogue was not carried over into the AgoraEU proposal and urges the Commission to revise the Regulation in this regard.
- 1.14 The Committee stresses that the impact of the AgoraEU and Justice programmes depends on the existence of adequate national infrastructure and funding frameworks. It therefore asks linking access to EU shared management funds (such as the European Cohesion Fund and European Social Fund+) to the demonstrated commitment of Member States to complement and sustain the objectives of these directly managed programmes.

2. **EXPLANATORY NOTES**

- 2.1 In line with the free and democratic Europe priority set in the 2024-2029 EU Strategic Agenda, the European Commission announced the proposed AgoraEU programme, which aims to support the pillars of a strong democracy, including culture, media and civil society. The proposed regulation establishing the AgoraEU programme is within the scope of the Multiannual Financial Framework (MFF) 2028-2034 package and aims to replace the current Regulations (EU) 2021/692 (CERV) and (EU) 2021/818 (Creative Europe) on 1 January 2028.
- 2.2 The EESC noticed the Commission's strategic shift in EU funding policy: by uniting Creative Europe and CERV, the Commission aims to streamline funding mechanisms, enhance cross-sector synergies and respond more dynamically to pressing societal challenges. According to the Commission, AgoraEU is framed as 'building on the legacy of Creative Europe and Citizens,

¹ Mentioned in the explanatory memorandum in the proposed regulation.

Equality, Rights and Values (CERV)' to create a single integrated programme that not only streamlines access for applicants but also enhances cross-sector coordination.

- 2.3 The AgoraEU proposal provides for a total financial envelope of EUR 8.58 billion, exceeding the combined allocations of the current CERV and Creative Europe programmes and thereby enabling reinforced investment in culture, the media, democracy, rights and equality. The Justice proposal provides for a total financial envelope of almost EUR 800 million to support the further development of the European Area of Justice. Both proposals align with the broader trend in the MFF proposals of strengthening rule-of-law, justice, security and competitiveness dimensions of EU policies.
- 2.4 The EESC welcomes the fact that the AgoraEU programme contains a doubling of funding for the 'Democracy, Citizens, Gender Equality, Rights and Values' strand (formerly the CERV + (Citizens, Equality, Rights and Values)) within the new Multiannual Financial Framework (MFF) 2028-2034. At the same time, the EESC notes that, in comparison with the EU's major economic and security programmes, the resources devoted to fundamental values, democratic participation and civil society engagement remain relatively modest.
- 2.5 EESC points out that in its opinion on the European Democracy Shield², the Committee called on the EU's budgetary authorities to considerably increase the budget for the support of civil society organisations within the EU and in the candidate countries under the next MFF. Spending priorities should be structural support for CSOs, capacity building for CSOs, emergency funds for the protection of and judicial support for CSOs and activists against foreign interference, Strategic Lawsuits Against Public Participation (SLAPP) and other forms of harassment, and projects in the areas of human rights, rule of law, democracy, anti-corruption, political participation, gender equality, LGBTQ+ rights, remembrance, the fight against political extremism, societal resilience, European values and media, digital and AI literacy.
- 2.6 The EESC also points out that the above-mentioned opinion also called on the EU's budgetary authorities to establish a funding programme to support quality journalism in the EU and candidate countries. Spending priorities should be support for journalism academies, projects on teaching European studies to journalists, projects on digital and AI literacy for journalists, support for the protection of and judicial support for journalists against foreign interference, SLAPP and other forms of harassment, with a special focus on freelancers, and budgetary support for high-quality media.
- 2.7 The proposed AgoraEU regulation underlines that the importance of an EU financial intervention in the programme areas lies in their ability to foster inclusive and participatory governance. Participatory governance refers to institutionalised mechanisms and practices that enable citizens and civil society to take an active role in policymaking and implementation, alongside public authorities. While the regulation acknowledges the watchdog function and the essential role of civil society organisations in contributing to policy implementation, it does not sufficiently reflect their advocacy and expert role, through which individuals and organisations articulate interests,

² EESC opinion on ['Enhancing the EU's ability to protect the European democracies'](#) (not yet published in the official journal).

defend rights and influence public policies and decision-making with a view to fostering genuine dialogue and co-creation.

- 2.8 Regulation (EU) 2021/692 establishing the Citizens, Equality, Rights and Values (CERV) Programme (2021–2027), Regulation (EU) 2021/818 establishing the Creative Europe Programme (2021–2027) and Regulation 2021/693 establishing the Justice Programme (2021–2027) explicitly include the possibility of awarding operating grants to co-finance the functioning of EU umbrella organisations and networks. These general provisions are no longer included in the Commission’s proposals for the AgoraEU and Justice programmes for 2028–2034.
- 2.9 The EESC endorses the Commission’s acknowledgement in the proposed regulation that the traditional role of civil society organisations in upholding the values enshrined in Article 2 of the Treaty on European Union is being challenged by a weakening of financial and political support and by attacks on and threats to civil society because of their work. By maintaining operating grants in CERV+ and introducing them into the media strand alongside project grants, the AgoraEU programme can create the necessary balance between financing innovative activities and ensuring the long-term capacity of civil society organisations.
- 2.10 The same *rationale* also applies to cultural networks supported under the Creative Europe – Culture strand and to umbrella organisations and networks that promote the rule of law and fundamental rights under the proposed Justice programme. The interim evaluation³ of the 2021–2027 Justice programme found that ‘some beneficiaries also expressed concern about their dependency on EU funding for the continuation of their initiatives’. That suggests the need for more stable or diverse funding (which operating grants could help with).
- 2.11 According to the proposed regulation, the use of FSTP, which has proven effective in making EU funding more accessible to small organisations, will also continue and could be extended where appropriate. The effectiveness of FSTP is contingent upon the independence of intermediary organisations, which must therefore be ensured as a fundamental eligibility criterion. If those intermediaries are not independent (e.g. tied to government interests, or biased), the distribution of funds risks being distorted, undermining fairness, inclusiveness and trust.
- 2.12 The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. The case law of the Court of Justice of the European Union (CJEU)⁴ confirms that any entity implementing Union actions must act in conformity with fundamental rights. Compliance with the values as enshrined in the TFEU and the Charter of Fundamental Rights as a condition for eligibility ensures that EU funding respects the Treaty obligation to protect fundamental rights and prevent the misuse of funds. Introducing a verification mechanism that goes beyond a declaration of honour would operationalise these values in practice.

³ [COM\(2025\) 267 final](#).

⁴ See Case C-619/18 (ECLI:EU:C:2019:531) and Case C-78/18 (ECLI:EU:C:2020:476).

- 2.13 In the context of the recognised decline in financial support for the types of stakeholders targeted by the programme, co-financing requirements may become a barrier to access for beneficiaries such as civil society organisations, local media outlets and smaller cultural and creative organisations, particularly in Member States where national or private funding is limited or politically constrained. The same concern applies to non-profit organisations acting as intermediaries under FSTP schemes, which should not be required to provide co-funding.
- 2.14 The EESC notes that the mandate of the current Creative Europe Desks has been designed primarily to serve the cultural and creative sectors and the national CERV programme contact points to help applicants and beneficiaries related to the programme. In the AgoraEU proposal, however, cross-sector cooperation and innovation are envisaged across the cultural, media and civic fields.
- 2.15 In the AgoraEU proposal, no separate cross-sectoral strand is foreseen. Instead, the proposal introduces ‘cross-cutting and horizontal priorities and activities’. The current Creative Europe Desks and the existing national CERV contact points (to become Programme Desks under AgoraEU), which are tasked with promoting the programme, guiding applicants, supporting cooperation and disseminating results, are now placed under horizontal activities without a clearly defined budget allocation. It therefore remains unclear which strand, if any, will underpin their financing and how stable that financing will be.
- 2.16 The EESC notes that use of lump sums and multi-annual grants are welcome as measures to simplify implementation and reduce administrative burden for beneficiaries. However, they can create challenges for beneficiaries, particularly in the context of high inflation and multiannual projects, where the fixed amounts agreed in advance risk losing their real value over time. This situation is further exacerbated for beneficiaries in non-euro countries, who face exchange rate fluctuations that may significantly reduce the purchasing power of EU contributions in their local currency.
- 2.17 In the AgoraEU proposal, references to links with the European Competitiveness Fund are made exclusively in relation to the Media+ strand. However, the proposal does not specify which financing mechanisms under the ECF would contribute to Media+ priorities, nor does it indicate whether a dedicated budget is planned. Given the importance of predictable and coherent support for the media and audio-visual sector, the EESC considers it essential that the Commission clearly outline how these synergies will operate in practice and what level of resources may be expected.
- 2.18 Under the Victims’ Rights Directive (2012/29/EU), all Member States must ensure that victims are recognised, treated with respect and can access support and justice. The Justice programme 2021–2027 already includes some actions in this area but they are fragmented and under-resourced, and the new proposal only mentions victims indirectly. Ensuring that victims can effectively exercise their rights across the EU would not only give tangible effect to the Charter of Fundamental Rights but also reinforce mutual trust in the European Area of Justice.
- 2.19 In the explanatory memorandum of the AgoraEU proposed regulation, geographical imbalance is explicitly identified as a challenge for the cultural and creative sectors. Professionals in these fields often face structural obstacles that limit their ability to work across borders, build

sustainable partnerships and access new opportunities and markets. These difficulties are particularly acute in regions with fewer resources or weaker support structures, where limited access to funding, networks and mobility opportunities creates barriers to participation in EU programmes. As a result, geographical imbalances risk reinforcing existing inequalities within the EU's cultural and creative ecosystem.

- 2.20 The interim evaluation of the 2021-2027 Justice Programme found that the 'organisations based in some Member States applied and received funds more frequently than organisations based in other Member States'. In other words, funding is concentrated in Western and Northern Europe, with lower participation from central, eastern and some southern Member States.
- 2.21 Both AgoraEU and Justice are placed under Heading 2 - *A Free and Democratic Europe*, sharing the same strategic goal: strengthening democracy, the rule of law and fundamental rights. A structured approach to joint funding implements that shared mission. AgoraEU empowers civil society, media and citizens, while Justice strengthens institutions, courts and rule of law mechanisms. Joint actions can bridge the two – for instance, on access to justice, fundamental rights or judicial cooperation on equality issues. Implementing combined funding shows that the EU treats democracy, the rule of law and rights as interconnected – not separate policy silos.
- 2.22 The Committee considers that developing a concrete plan of action to implement combined and cumulative funding for the *AgoraEU* and *Justice* programmes would significantly enhance the coherence and impact of EU spending under Heading 2 – *A Free and Democratic Europe*. Such a plan would improve coordination between the relevant Commission directorates-general, optimise the use of resources through joint or back-to-back calls and reduce administrative burdens for beneficiaries. It would also strengthen the visibility and added value of EU action by linking support for civil society and media to the promotion of justice, the rule of law and fundamental rights.
- 2.23 The Committee considers that direct dialogue between the Commission and programme beneficiaries, including on the work programme and its implementation, was an innovative feature of CERV which contributed positively to transparency and responsiveness. Such dialogue mechanisms should be preserved and further reinforced across AgoraEU to ensure civil society remains meaningfully involved in decision-making and oversight. The need for a comprehensive strategy for civil dialogue resulting in an action plan has also been highlighted in the Committee's Opinion on Crises and crisis phenomena in modern Europe and civil society⁵.
- 2.24 EU programmes (AgoraEU and Justice, under direct management) depend on national investment and services financed through shared management instruments, notably the European Cohesion Fund (ECF) and ESF+, but Member States often fail to provide matching support. Their long-term impact depends on national systems and infrastructure (courts, legal aid, victim support services, cultural or civic centres, etc.) while the European Parliament, EESC and Court of

⁵ OJ C, C/2025/2957, 16.6.2025, ELI: <http://data.europa.eu/eli/C/2025/2957/oj>.

Auditors have repeatedly called for better complementarity between shared and directly managed funds (e.g. CERV–ESF+, Erasmus–ECF)⁶.

2.25 Ensuring national co-investment is not a sanction mechanism but a partnership principle: it guarantees that EU programmes (AgoraEU and Justice) have sustainable local foundations, such as victim support centres, equality bodies or cultural spaces, which make European funding meaningful for citizens. Linking shared management funds (like ECF) to these objectives transforms EU spending into a cohesive ecosystem of support for democracy, the rule of law and justice across all Member States.

2.26 The Committee underlines the importance of people-to-people exchanges between citizens, including town twinning projects, networks of towns and activities that commemorate key moments in modern European history. It considers that these initiatives foster mutual understanding, societal resilience and a shared sense of belonging to the Union, thereby strengthening citizens’ engagement in society and their participation in the democratic life of the Union. The Committee calls on the Commission to ensure that such activities under the AgoraEU programme remain accessible, inclusive and geographically balanced, with particular attention to local authorities, small civil society organisations and communities with lower participation rates.

3. **PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION**

Amendment 1

linked to recommendation 1.13

Text proposed by the European Commission	EESC amendment
(23) Civil society organisations, and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, holding institutions accountable, and driving positive change. The Programme should help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively. To this end, Union funding should complement efforts at national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018, as well as Council conclusions of 10 March 2023 and 7 March 2025. Civil society also plays an important role in	(23) Civil society organisations, and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, holding institutions accountable, and driving positive change. The Programme should help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively. To this end, Union funding should complement efforts at national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018, as well as Council conclusions of 10 March 2023 and 7 March 2025. Civil society also plays an important role in

⁶ See [C\(2021\) 2583 final](#); [P10_TA\(2025\)0027](#); [The 2025 annual work programme for the implementation of Erasmus+](#); [COM\(2025\) 267 final](#); and [European Court of Auditors, review 04/2025: ‘The Future of EU Cohesion Policy – drawing lessons from the past’](#).

<p>ensuring an effective implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council by fostering a speak-up culture and a favourable environment for whistleblowers.</p>	<p>ensuring an effective implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council by fostering a speak-up culture and a favourable environment for whistleblowers. <i>The Citizens, Equality, Rights and Values (CERV) Programme established a framework for structured civil dialogue between the European Commission and civil society organisations, promoting participatory democracy, transparency and inclusive policymaking. In order to ensure continuity, coherence and complementarity between existing participatory instruments and the AgoraEU Platform, the structured civil dialogue under the CERV Programme should be explicitly integrated into the governance and operational framework of AgoraEU. Such integration will help maintain established channels of engagement, avoid duplication and strengthen the representativeness and legitimacy of citizen and civil society input into Union policies.</i></p>
--	---

Reason
<p>The Committee considers that direct dialogue between the Commission and programme beneficiaries, including on the work programme and its implementation, was an innovative feature of CERV which contributed positively to transparency and responsiveness. Such dialogue mechanisms should be preserved and further reinforced across AgoraEU to ensure civil society remains meaningfully involved in decision-making and oversight. The need for a comprehensive strategy for civil dialogue resulting in an action plan has also been highlighted in the Committee’s Opinion on Crises and crisis phenomena in modern Europe and civil society (SOC/812).</p>

Amendment 2

linked to recommendation 1.13

Text proposed by the European Commission	EESC amendment
	<p><i>Article 16 - Structured civil dialogue</i></p> <p><i>The Commission shall ensure the organisation of structured civil dialogue with representative civil society organisations, building upon and maintaining the mechanisms developed under the Citizens, Equality, Rights and Values (CERV) Programme. The structured civil dialogue shall serve as a permanent forum for</i></p>

	<i>regular exchanges between the Commission and civil society organisations at EU and national level, including organisations representing citizens, equality, fundamental rights and values.</i>
--	---

Reason
Same as AM 1.

Brussels, 4 December 2025.

The President of the European Economic and Social Committee
Séamus BOLAND
