

EU Civil Society Strategy - Open Public Consultation

Fields marked with * are mandatory.

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Introduction

Civil society organisations, which are frequently referred to as non-State, not-for-profit, non-partisan and non-violent structures, through which people organise to pursue shared objectives and ideals[1], play diverse roles across our society and are active in several sectors, ranging from awareness-raising, education, providing support or services, policy monitoring and advocacy. The implementation of EU law and policies on the ground is often entrusted to these actors.

Civil society organisations strengthen social cohesion and preparedness, enhance policy effectiveness, and ensure that the voices of affected communities are heard. The engagement of such organisations is also a crucial element in the system of democratic checks and balances and the promotion and defence of EU values.

The Commission uses a comprehensive toolbox to support and involve civil society organisations. In addition to dialogues in a wide range of policy areas and the Better Regulation channels of consultation, there is regular involvement in a high number of our Commission expert groups, providing extensive tools and opportunities for all interested stakeholders to contribute throughout the policy-making cycle. The European Economic and Social Committee plays a key role in the engagement with civil society.

An enabling environment, which fosters meaningful engagement and participation and provides further support, is essential for all civil society organisations to carry out their work and contribute to EU policies. A safe and enabling environment for civil society organisations means a space where their fundamental rights and those of their members are protected. They should be able to pursue their activities without interference, and with sufficient and transparent access to financial resources, and steps at EU level should be taken to promote and protect the civic space and those active within it.

The need for stepping up engagement with and protection of civil society at EU level was stressed in the Commission President's Political Guidelines for 2024-2029, and reiterated in the mission letter to the Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection. The EU Civil Society Strategy builds on this

political commitment and on Recommendation 2023/2836 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes, adopted as part of the Defence of Democracy Package.

Acknowledging the importance of the work done by civil society organisations for the success of EU policies, the EU Civil Society Strategy would establish a framework for action, both at EU and national level; its key objectives would be to foster dialogue with civil society actors and provide them with the necessary support and protection so that they can carry out their work.

The Commission would like to consult the general public and stakeholders on the key issues that the Strategy should address, structured around:

- The role of civil society organisations in the European Union;
- Challenges and risks faced by civil society organisations in the European Union;
- Measures currently in place at national and EU level to engage with, support and protect civil society organisations;
- Further steps to be taken at EU level to engage with civil society organisations and to support and protect them in their work.

Stakeholders likely to be interested in this initiative include:

- individual citizens
- Member States' national authorities
- EU institutions and bodies, including the European Parliament, the Council, the European Economic and Social Committee, the European Committee of the Regions, EU Agencies
- international organisations, such as the Council of Europe, OSCE-ODHIR, the OECD and the United Nations
- relevant EU-level networks
- civil society organisations (including youth organisations) and their networks/umbrella organisations
- national human rights institutions, equality bodies and their networks
- representatives of academia and researchers
- donors at national, EU and international level

[1] For the purpose of this public consultation, any reference to 'civil society organisations' should be understood as referring also to 'human rights defenders'. See also the term used in Commission Recommendation (EU) 2023 /2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes.

About you/your organisation

* I am giving my contribution as:

- ☐ Individual
- ☒ Civil society organisation
- ☐ Network/umbrella organisation for civil society organisations
- ☐ Academic or research institute
- ☐ Business association
- ☐ Company/business
- ☐ Consumer organisation, including passenger rights' organisations
- ☐ National human rights institution or equality body
- ☐ Network of national human rights institutions or equality bodies
- ☐ Public authority in EU Member State (municipal, local, regional or national level)
- ☐ Public authority (EU level)
- ☐ Public authority non-EU Member State
- ☐ International organisation
- ☐ Trade union

* If a civil society organisation: Please indicate your **main** areas of activity. Please choose max. 3 that apply:

Maximum 3 selection(s)

- ☐ Academic freedom
- ☐ Access to justice, including victims' rights and support, legal aid
- ☐ Rights of older people, including discrimination against older people
- ☐ Youth, including discrimination against youth
- ☐ Anti-corruption and transparency
- ☐ Anti-Muslim hatred / anti-Muslim racism
- ☐ Antisemitism
- ☐ Anti-racism and non-discrimination
- ☐ Anti-torture
- ☐ Anti-trafficking/contemporary forms of slavery
- ☐ Civic space
- ☐ Protection of human rights defenders
- ☐ Children's rights and participation, violence against children
- ☐ Consumer rights
- ☐ Culture and artistic freedom
- ☐ Democracy and rule of law
- ☐ Digital rights, privacy, data protection
- ☐ Disabilities

- ☐ Economic and social rights, poverty eradication
- ☐ Education and civic rights education
- ☒ Environmental rights and protection / climate activism
- ☐ Freedom of speech/expression/assembly/association
- ☐ Hate speech and crime and intolerance
- ☐ Health
- ☐ Homeless persons
- ☐ Human rights – general
- ☐ Humanitarian response
- ☐ Migration, asylum, refugee support, return, and search and rescue at sea
- ☐ Integration and social inclusion of migrants
- ☐ International cooperation and development
- ☐ LGBTIQ+ rights
- ☐ Media freedom and protection of journalists
- ☐ Mental health
- ☐ Minority rights
- ☐ Non-profit management
- ☐ Partnerships and social economy platforms
- ☒ Passenger and traveller rights, including passengers with reduced mobility and disabilities
- ☐ Protection or assistance for victims of crime
- ☐ Religion / freedom of religion and beliefs
- ☐ Roma and Travellers, Antigypsyism
- ☐ Sexual and reproductive health and rights
- ☐ Sports
- ☐ Anti-terrorism
- ☐ Women's rights, gender equality and violence against women
- ☐ Prefer not to say
- ☐ Do not know
- ☐ Other

* At which level do you primarily work?

- ☐ International level
- ☒ EU level
- ☐ Transnational level
- ☐ National level
- ☐ Regional or interregional level

The role of civil society organisations in the European Union

In your view, what are the main areas in which civil society organisations contribute to society in the EU and at national level? (Please rank each option according to the importance, from 1-5, **1 =most important**)

	1	2	3	4	5
* Representing and giving voice to different communities and interest groups	☒	☐	☐	☐	☐
* Advocating for policy change and defending fundamental rights and other common values, such as democracy and the rule of law	☐	☒	☐	☐	☐
* Delivering services and support to communities and individuals, including victim assistance and support	☐	☒	☐	☐	☐
* Acting as watchdogs and promoting transparency, accountability, and good governance	☒	☐	☐	☐	☐
* Strengthening social cohesion	☐	☒	☐	☐	☐
* Strengthening societal resilience and crisis preparedness	☐	☒	☐	☐	☐
* Strengthening democratic participation, and civic engagement	☒	☐	☐	☐	☐
* Accompanying the implementation of EU policies	☐	☐	☐	☒	☐
* Other	☐	☐	☐	☐	☒

If Other, please specify

1500 character(s) maximum

In your view, what role do civil society organisations play in your Member State?

1500 character(s) maximum

EPF is a European umbrella organisation and therefore has an overall view on the situation. Passenger organisations emerged as grassroots initiatives in many countries since the late 1970s, often starting on regional level. They have since sought to influence transport planning and policy. The focus of our members varies, but two main objectives can be identified: a) Defending consumer interests: Public transport is most often heavily regulated and influenced by political decisions in all stages of service development. Competition in the market is often absent. Consumer protection has traditionally been lacking both in legal protection and customer care. Passenger organisations aim to offset this systematic imbalance of power as far as their resources permit. b) Promoting public transport as a sustainable means of travel: Many initiatives emerged due to concerns about environmental problems caused by private motorised transport and/or declining public transport (as environmentally friendly alternative to the car). Passenger organisations thus may be seen as sustainability campaigners before that term entered common language. Although the EU's Passenger Rights Directives have improved consumer protection over the last 20 years, there are still many topics where civil society organisations are necessary. There is evidence that PTOs and PTAs are more passenger friendly in those members states where civil societal organisations are part of the formal decision making process

Challenges and risks faced by civil society organisations in the European Union

Please indicate your perception of the challenges and risks faced by civil society organisations in the European Union. You can provide examples in the field below.

	Very high	High	Neutral	Low	Very low	Do not know
* Restrictive legal framework/legal barriers (disproportionate legislative restrictions concerning the freedom of association, access to information, loss of charitable/public benefit status etc.)	☐	☐	☒	☐	☐	☐
* Legal action / strategic lawsuits against public participation (SLAPPs)	☐	☒	☐	☐	☐	☐
* Criminalisation of the work of civil society organisations	☐	☐	☐	☐	☐	☒
* Subjection to disproportionate or burdensome fines	☐	☐	☒	☐	☐	☐
* Administrative barriers (burdensome registration processes, excessive administrative requirements or controls)	☐	☐	☒	☐	☐	☐
* Suspected surveillance (e.g. by law enforcement)	☐	☐	☐	☐	☐	☒
* Verbal threats and attacks against civil society organisations offline and online (e.g. online threats or harassment, disinformation)	☐	☐	☒	☐	☐	☐
* Negative media reports/campaigns	☐	☐	☒	☐	☐	☐
* Physical threats and attacks (e.g. vandalism of premises or property, physical attacks against employees/volunteers)	☐	☐	☐	☒	☐	☐
* Limits on access to information	☐	☒	☐	☐	☐	☐
* Censorship (e.g. the suppression of public communication, other information by public authorities)	☐	☐	☒	☐	☐	☐
* Limited or inflexible funding, funding cuts	☐	☒	☐	☐	☐	☐
* Operational challenges (e.g. staffing, use of digital tools, cybersecurity, lack of specialised knowledge /training)	☐	☒	☐	☐	☐	☐
* Legal fragmentation within the EU and difficulties to operate in other EU Member States (e.g. due to lack of recognition, administrative burden, etc.)	☐	☒	☐	☐	☐	☐

* Other types of challenges (if aware, please provide examples below)



If relevant, please provide an example in accordance with the above identified challenges

1500 character(s) maximum

Passenger organisations' areas of activity are usually not that prominent and controversial that they have to face massively obstructive action against them. Instead, they often face structural limitations, which can nevertheless have an equally negative effect on their work: - lack of funding and other resources (as most organisations are grassroots-based and rely on donations, membership fees and the like) - collusion of influential stakeholders with opposing views, for example car industry, political and administrative leadership in transport administrations and publicly-owned providers - technical character of many issues and long timescale of many processes needed for change which makes it difficult for organisations to build up expertise, follow processes through and mobilise public attention.

If other types of challenges, please provide examples

1500 character(s) maximum

These limitations can be addressed in different ways: better, more stable funding and resources are essential to provide a more level playing field between passenger organisations and those representing competing interests. In addition, we believe that planning, decision making and monitoring in many places can be improved for better transparency and accountability, which would make it easier even for small organisations to express their views in a timely and effective manner.

Why do you think it is important to protect civil society organisations?

1500 character(s) maximum

As mentioned above, passenger and environmental transport organisations have been early campaigners for sustainable development in their area of activity. This is more necessary than ever. They have a role to play on all levels of policymaking, from local transport planning up to international agreements. By addressing issues close to people's everyday life (public transport planning and quality), they provide an easy access-point for citizens to get involved in politics, contribute to democratic debate and decision making. Public transport also has an important role to play in achieving socially sustainable transition of the mobility system. As highlighted in recent EU communications (Verordnung (EU) 2023/955, Empfehlung (EU) 2025/1021), combatting transport poverty has to be a key concern to uphold public acceptance of the necessary measures. This is a multi-faceted challenge going far beyond the issue of user costs and accessibility. The wide range of issues covered by passenger organisations will be valuable in addressing them effectively. At the EU level, particularly for civil society federations, the diversity of national and local member organizations is both a strength and a risk. This underscores the importance of organizations like EPF as a common umbrella and the need for a proper operational framework.

In your view, are some civil society organisation facing particular challenges/more at risk than other civil society organisations (e.g. working on different topics or providing different services)?

☒ Yes

☐ No

If YES, in which areas are these civil society organisations active? And which particular challenges / risks are they facing?

1500 character(s) maximum

see next question

What is your overall assessment of how these challenges for civil society organisations have evolved over the last 5 years?

- ☐ Significantly improved
- ☐ Somewhat improved
- ☐ Stayed the same
- ☒ Somewhat worse
- ☐ Much worse

(Optional follow-up): Please briefly describe how the situation has worsened/improved.

1500 character(s) maximum

Considering the importance of the sustainability transition, it would appear that the case for good public transport is more easily made. But as there is no general agreement on this topic and which specific measures should follow from it, this is not guaranteed. We do not have any direct evidence that our members have been negatively affected so far, because transport policy is usually less prominent and openly controversial. Potential risk factors that might change this and affect our work could be a) a more widespread hostility in society towards fighting climate change and b) negative personal impacts of the transformation towards green industry, e.g. job losses in car or car component producing companies.

Existing measures to support and create an enabling environment for civil society organisations

In your view, how effectively does your country support an enabling environment for civil society organisations to operate freely and independently?

- ☐ Very effectively
- ☐ Somewhat effectively
- ☐ Not very effectively
- ☐ Not at all effectively
- ☒ Do not know

Which of the following measures do you think are most important to ensure a safe and supportive environment for civil society organisations in your country?

Maximum 3 selection(s)

- ☒ Legal protections for freedom of association, assembly and expression
- ☒ Access to predictable, transparent and sustainable funding
- ☐ Clear rules and transparent criteria for participation in policymaking and public consultations, and effective mechanisms to enable such participation (e.g. access to information, regular feedback cycles)
- ☐

Protection from threats, harassment or attacks

- ☒ Public recognition and awareness of civil society organisation's work
- ☐ Impact assessments on the impact of laws on civil society organisations
- ☐ National policies or strategies on civil society
- ☐ Other

Dialogue / Participation

Are you aware of existing rules or structure in **your country** (EU Member State(s)) concerning how public authorities engage with civil society organisations, in particular to allow them to meaningfully participate in the decision-making process? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

There are good examples for passenger representations in different countries for various stages of policymaking, service planning and implementation. Due to space limitations, we mention them just briefly here:

- formalised representation of passenger organisations in planning/tendering and operations in the Netherlands
- "passenger watchdog" organisations in the UK - service charter documents with customer-related standards in Italy and UK - formalised discussion/debating formats in France and sometimes Germany - consultations on timetable design in Switzerland and parts of Germany - "travel guarantee" schemes for areas not covered by Passenger Rights Regulations in Sweden

The problem is that these measures are far from universally available (see below), and that they usually allow engagement of CSOs only for specific stages or topics.

Are you aware of existing measures **at EU level** to engage with civil society organisations, in particular to allow them to meaningfully participate in the decision-making process? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

As a European organisation, we have built up expertise about policymaking processes among our staff and members. However, we hear from our member organisations that it is not always easy for them to participate. This has to do with information not reaching them in time and in the formats they use, but also with the long timescales of EU policymaking and the way in which issues are communicated, which can be perceived as abstract and not relevant for them.

* What further measures could be considered by the EU to engage with civil society organisations to ensure they can meaningfully participate in the decision-making process at EU level?

1500 character(s) maximum

Interaction with passenger/environmental transport CSOs is complicated by the small scale, topical heterogeneity and limited resources of most associations. They are often focused on their home region and lack the structures to follow political processes on EU level and hence the ability to contribute at the right time and according to requirements. To bridge the gap and to facilitate interaction between EU-level policy makers and end-users, EPF proposes to set up a 'passenger observatory', which would collect input from the grassroots level or civil society to feed into the policy process, but also vice versa, communicate and disseminate EU policy to civil society and end-users. This could cover several aspects of participation:

- Monitoring compliance with and enforcement of existing EU regulations
- Monitoring progress of sector initiatives
- Benchmarking performance and collecting best practices
- Raising awareness and increasing acceptance of EU policy

Alternatively (and in addition to) such an observatory, EU institutions could improve their efforts in consulting

with CSOs on national/regional/local level through more and better targeted communication about their activities and relevant consultations.

In your view, in which policy areas should civil society participation be further strengthened?

1500 character(s) maximum

Regarding the possibilities for passenger organisations to impact developments, we would highlight two cross-cutting factors: - While there are good examples of citizens' participation and user protection, their use across Europe varies greatly. Problems arise mainly in regions where such instruments are not in use and/or their results are not taken seriously by political and administrative stakeholders. - The role of informal dialogue and lobbying is not to be underestimated even in places where formalised processes for participation exist. Here, user organisations' possibilities depend largely on their communicative skills and resources. Participation can therefore be improved by strengthening user organisations and promote a wider adoption of good practices where these are not already applied.

Protection

Are you aware of existing measures **in your country** to protect civil society organisations that are at risk? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

We refer to the general comments on the situation of passenger organisations in the "Challenges and risks..." section above.

Are you aware of existing measures **at EU level** to protect civil society organisations that are at risk? If so, please provide examples, in particular of any relevant best practices.

1500 character(s) maximum

We refer to the general comments on the situation of passenger organisations in the "Challenges and risks..." section above.

Please indicate which of the following measures, to be taken at EU level, would in your view be most important to protect civil society organisations in the EU (ranking from 1 to 5, 1=most important)

	1	2	3	4	5
* Gather, consolidate and report information on the situation of civil society organisations across the EU	☐	☒	☐	☐	☐
* Introduce specific protection measures for civil society organisations facing threats and attacks at national level (e.g. hotlines, dedicated complaint mechanisms within police structures, psychological support, safe housing, relocation, etc.)	☐	☒	☐	☐	☐
* Strengthen the role of National Human Rights Institutions to protect civil society organisations	☐	☐	☒	☐	☐
*					

Specific protection measures for civil society organisations facing threats at EU level	☐	☒	☐	☐	☐
* Funding for civil society organisations promoting democracy and common values	☒	☐	☐	☐	☐
* Funding for civil society for protection measures, including legal, cyber, physical and psychological protection	☐	☐	☒	☐	☐
* Funding for capacity building and training of civil society organisations, including on holistic protection	☐	☒	☐	☐	☐
* Work with international organisations to strengthen the protection for civil society organisations	☐	☐	☒	☐	☐
* Reinforce regular dialogue with civil society organisations at national level	☐	☐	☐	☒	☐
* Support to EU Member States to put in place participation frameworks for civil society organisations	☐	☐	☒	☐	☐
* Reinforce regular dialogue with civil society organisations at EU level	☐	☒	☐	☐	☐
* Facilitate cross-border activities of civil society organisations in the EU	☐	☒	☐	☐	☐

What further measures could be considered by the EU to better protect civil society organisations that are at risk?

1500 character(s) maximum

We refer to the general comments on the situation of passenger organisations in the “Challenges and risks...” section above.

Funding

* How important do you think it is to provide public funding at EU and national level for civil society organisations' activities to support them in the various roles they play in society (e.g. advocacy, support services, watchdog function, awareness raising, etc.)

- ☒ Very important
- ☐ Important
- ☐ Moderately important
- ☐ Slightly important
- ☐ Not important
- ☐ Do not know / no opinion

Do you think that public funding provided in your country for the work of civil society organisations is sufficiently accessible and transparent?

- ☐ Yes, it is generally transparent and accessible
- ☒ It is somewhat transparent and accessible, but improvements are needed

- ☐ No, it lacks sufficient transparency and accessibility
- ☐ I am not aware of how funding is managed
- ☐ Do not know / No opinion

What are the main obstacles preventing civil society organisations from fully benefiting from public funds at national or EU level?

1500 character(s) maximum

Public funds are usually available for specific purposes, target groups, timeframes and subject to administrative requirements, with details laid down in the respective programme guidelines. All these factors can be (and are) barriers to use by CSOs in transport: - There are not many funding programmes directly applicable to the organisations' areas of activity. In addition, finding out about possibilities is often difficult for CSOs if these are only published in official journals, technical websites or other channels not normally used by them. - Eligibility is often limited to organisations of certain legal forms or size. - Most public funding schemes are available for time-limited projects only, making it difficult to build up capacities and retain staff. - Public funding is often intended to cover part of the costs only. For CSOs with limited own resources, it can be very difficult to get the necessary match funding, in particular if existing staff, volunteer labour and the like are not considered eligible. - The administrative effort needed for financial and topical reporting can be a burden on CSOs' capacities.

* Do you think that the current legal frameworks in the EU sufficiently allow for cross-border funding (e.g. donations made from a donor in one Member State to a civil society organisation based in another Member State)?

- ☐ Yes
- ☐ Improvements are needed
- ☐ No, there are barriers
- ☒ Do not know / No opinion

Are smaller, grassroots or marginalised community-based civil society organisations adequately supported by existing funding mechanisms?

1500 character(s) maximum

See comments in previous question. EPF does not have the resources to comment on the situation in Member States in detail, but based on the feedback from our member organisations we believe that all of the barriers and problems described there affect CSOs in the various countries to some extent. To counteract these problems, conditions of funding programmes can be modified for each of the issues outlined above so that become less burdensome for CSOs. Considering the fact that relatively modest amounts of funding already would be of much use for a typical small-size CSO, public funders could also consider setting up special schemes of mechanisms limited to CSOs that make available more restricted amounts of money but are more easily accessible in administrative terms.

Contact

[Contact Form](#)

