

## D4T Coalition Joint Position Paper: A Civil Society Strategy that works for Civil Society

The EU Civil Society Strategy is a very timely initiative, at a point when civil society organisations are facing [growing backlash](#) across the EU for their activities. An example of this trend is the repression faced by environmental defenders, according to a 2024 [position paper](#) by the UN Special Rapporteur on Environmental Defenders under the Aarhus Convention. A 2025 [report](#)<sup>1</sup> from an NGO consultation with environmental defenders highlights a significant need for sustainable and structural support, particularly funding, as well as the need for protections for environmental activism and the revision of harmful legislation that restricts protest and civic space. [Data collected](#) by the Fundamental Rights Agency through its most recent civic space survey also shows that the vast majority of respondents from EU member states faced some form of threat or attack in 2024.

Many human rights and environmental defenders, civil society actors, and members of social movements are looking towards the strategy with hope and resolve. This strategy is viewed, correctly so, as a crucial step in building democratic resilience and reinforcing the EU's commitment to democratic values, as civil society plays a vital role in fostering democratic resilience.

The elaboration and adoption of a Strategy has long been called for by NGOs such as [European Civic Forum](#) and [Civil Society Europe](#), and supported by [selected politicians](#) and the [European Economic and Social Committee President](#). We welcome this initiative as the Democracy for Transition coalition, a partnership of democracy/civic space and environmental/climate CSOs.<sup>2</sup>

The Commission's timely [recognition](#) of the important role civil society organisations and rights defenders play in protecting democratic systems and institutions and the vow to support, protect, and empower civil society could be read as a reaction to the mounting pressure and harassment CSOs and rights defenders are facing in the EU. The EU Civil Society Strategy should be informed by the needs and challenges faced by civil society actors and should be used as an opportunity to set stronger foundations for civil society's role in upholding democracy by providing consistent support across the full range of issues. In a heavily politicised context, the Strategy will serve as a test of the current Commission's commitment to protecting healthy democracies now and in the future.

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<sup>1</sup> The consultation found that many environmental defenders operate in unsafe or legally ambiguous contexts, where repression is increasingly normalised, often through laws that specifically target civil society. Supportive environments remain rare, and existing protections are applied unevenly and inconsistently. Respondents from Central and Eastern Europe highlighted repression via audits, foreign agent laws, police surveillance; respondents from Western Europe highlighted shrinking space for protest, SLAPPs, media repression; and respondents from Southern Europe focused on unstable or underenforced protections. When it comes to support from local and national authorities, most respondents described interactions with authorities as hostile, repressive, performative or inaccessible, and absent altogether.

<sup>2</sup> The coalition is made up of pro democracy and environmental organisations and its mission is based on the understanding that strengthening all aspects of our democracies, including democratic institutions, the rule of law, gender equality and civic space, while simultaneously fostering innovative approaches to democratic participation, is the only way out of the triple planetary crisis (climate change, pollution and biodiversity loss) and to achieve the reduction of inequality.

In the creation and implementation of the Civil Society Strategy, we encourage the Commission to be proactive and aim for a EU Strategy to support, protect, and empower civil society, which ensures holistic protection against direct attacks (such as SLAPPs), reduces administrative burdens, and provides structural support to address power imbalances (encouraging Member States to provide structural support), including:

### **On engagement**

- Avoiding bad practices and breaches of the Better Regulation principles when consulting the public and CSOs, which result in unbalanced engagement of stakeholders and undemocratic decision-making, as [currently observed](#) in the multiple 'Omnibus' legislative packages;
- Structured and permanent civil dialogue between institutions and organised civil society, in line with the [recommendations](#) in 'EU Civil Dialogue: The Foundations of an Institutional Framework';
  - The Commission intends to create a Civil Society Platform, which can centralise and harmonise the currently fragmented engagement of civil society actors in EU policymaking - this Platform should be co-designed with organised civil society.
- Measures to enable access to decision-making, by proactively reaching out to and seeking input from relevant civil society stakeholders, should be the norm, on top of the availability of institutions to listen when approached;
- Dialogue and engagement of civil society actors should be carried out before the EU institutions have already set a policy direction, which reduces the meaningfulness of engagement, and a clear feedback mechanism of how CSO contributions are taken into account should be implemented.

### **On protection**

- Protection mechanism for human and environmental rights defenders<sup>3</sup> at risk, as well as CSOs, according to the [mapping and pathways papers](#) of Civil Society Europe;
- Systematic monitoring of the civic space to identify threats and trends, done by independent agencies/bodies in close cooperation with as broad a range as possible of CSOs active on different issues, including in the choice of indicators;
- A complaints mechanism to identify civic space restrictions early and trigger a fast-track response from the EU;

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<sup>3</sup> The 2025 [report](#) from an NGO consultation with environmental defenders underscores the pressing need for systemic change in how environmental defenders (especially youth) are supported, protected, and included across Europe. Respondents from across the continent shared consistent experiences of repression, burnout, and legal uncertainty, compounded by insufficient mental health resources, structural exclusion from decision-making, and limited access to sustainable funding and training. To bridge the growing trust gap between young defenders and institutions, it is essential to translate recognition into concrete action: accessible funding, inclusive legal frameworks, protection from harassment, and formal roles in shaping policy. Defenders are already doing vital work, and they need national governments and the EU institutions to match their efforts with the care, credibility, and resources their role demands.

- Implementation and enforcement of: anti-SLAPP laws to prevent strategic lawsuits against activist (including the enlargement of the scope of protection in implementing laws, as the Directive is very restrictive); the right to protest and assembly; the criminalisation of hate speech targeting human rights and environmental defenders; and existing environmental law, as well as real accountability for state repression of civic engagement and activism.

### **On support**

- Operational financial support to enable CSOs to be structured and effectively engaged in EU policy development and implementation. The [preservation of LIFE operating grants](#) and the CERV fund, for example, is paramount to enable civil society participation and guarantee their transparency and accountability. Without material support, the power imbalance in favour of businesses, built into our economic systems, will be even more overpowering;
  - Strong structural support for civil society in the new Multiannual Financial Framework (MFF) should be ensured, including to enable CSOs to continue working on advocacy, campaigning, and participation in policymaking.
- The Commission should carry out systematic civic space impact assessments across all legislative and regulatory proposals, to ensure that all EU policies support rather than restrict civic space;
- Adopt and uphold regional and international human rights standards (UN, [OECD](#), CoE, etc);

A healthy democracy and a healthy environment are intrinsically linked and mutually reinforcing. Countries with the highest democratic indicators are also those with the most ambitious environmental and climate protection. A recognition of the spirit of international instruments that grant specific rights to NGOs, such as the Aarhus Convention, must be a starting point for an EU-level civil society strategy. Solutions to the current challenges the EU faces must be designed by and with people themselves, in cooperation with democratically elected institutions.

Europe's civil society organisations are working hard to promote citizen engagement and active citizenship, foster civil dialogue, and promote innovative democratic practices. These are invaluable assets that contribute to the EU's strength, resilience, and legitimacy. We are available to continue working with EU institutions to defend our democracy and promote social and environmental justice.

## Signatories:

1. European Environmental Bureau (EEB)
2. The Democratic Society (Demsoc)
3. France Nature Environnement
4. Youth and Environment Europe (YEE)
5. Rodzice dla Klimatu - Parents For Future Poland
6. Deutscher Naturschutzring (DNR) - German League for Nature Protection
7. ZERO - Associação Sistema Terrestre Sustentável
8. Umanotera - the Slovenian Foundation for Sustainable Development
9. Defend Democracy
10. Electra Energy
11. CAN Europe
12. ClientEarth
13. Arnika
14. Environmental Justice Network Ireland (EJNI)
15. Umweltdachverband
16. The German Speleological Federation (VdHK)
17. Jesuit European Social Centre
18. Women Engage for a Common Future (WECF)
19. Ecoteca
20. Green Legal Impact





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