

# NGO funding & transparency

## Updated Q&A

Last update: 07 October 2025

### Why this matters

Supporting civil society is not charity – it is democracy. For the EU to remain legitimate, citizens must have a voice alongside business, trade unions and other organised interests – especially in Brussels, where decisions with huge consequences for people and the planet are made. Operating grants and other funding for civil society ensure EU laws are rooted in evidence, fairness and broad public support, not just the interests of those who can afford to lobby.

A strong EU is one that its citizens trust. Supporting civil society is central to that trust. Undermining it would leave only the wealthiest and most powerful voices at the table, weakening Europe’s balance, credibility, and democracy.

This is why the debate on NGO funding has returned. What is being framed as a question of “transparency” is, in reality, the latest round of a long-running disinformation campaign aimed at discrediting NGOs and undermining the critical voices of citizens. It coincides with the launch of the European Parliament’s Budgetary Control Committee Scrutiny Working Group on NGO funding. Far from a neutral exercise, this initiative is being driven by extreme voices on the right and politicians who are determined to silence independent actors who hold power to account.

If the goal were truly to protect taxpayers’ money, the focus would be elsewhere. The real scandals are in sectors where EU funds have been misused or captured. In Member States across Europe, the European Public Prosecutor’s Office [uncovered massive fraud](#) in which hundreds of millions in farm subsidies were claimed for land not owned or farm work never carried out – forcing ministerial resignations. Most recently, [fossil fuel companies used threats and privileged access](#) to hollow out the Corporate Sustainability Due Diligence Directive – overriding clear [public](#) and [private](#) support for stronger accountability and putting the profits of a few executives above the rights of everyone else.

This is part of a wider erosion of European democracy since the last EU elections, targeting not only civil society but also other independent voices, including the free press. If transparency were truly the concern, scrutiny would apply equally to all beneficiaries of EU funds, including corporate and industry lobbies, as well as to the conflicts of interest of those pushing this narrative.

---

## **Summary: Why are Operating Grants important for a healthy democracy?**

### **1. Democracy needs a backbone – civil society is that backbone**

Rooted in the Treaty on European Union and the Aarhus Convention, civil society organisations are described as the “backbone of European democracy,” bridging citizens and policymakers, safeguarding transparency, and nurturing trust.

### **2. Funding civil society is funding democracy**

Operating grants are not a luxury – they are a legal and democratic necessity. Without them, only corporate voices dominate EU policymaking.

### **3. Pluralism in practice: Operating Grants level the playing field**

EU support helps balance the power asymmetry between resource-rich actors (corporations, foreign governments) and grassroots civil society and citizens-driven organisations.

### **4. No civil society, no ambition in the transition towards sustainability**

Civil society is essential for the transition towards sustainability. Undermining its funding undermines the EU’s climate and environmental ambitions and the needs for a Just Transition, all championed by civil society organisations.

### **5. Protecting civic space is protecting the rule of law**

Operating grants enable CSOs to defend fundamental rights, counter disinformation, and resist SLAPPs (Strategic Lawsuits Against Public Participation).

### **6. From consultation to co-creation: Civil society makes policy better**

CSOs do not just make comments – they co-create. Their participation improves policy quality, legitimacy, and public trust.

### **7. Transparency starts with CSOs**

Civil society funding is fully transparent, accountable, and publicly disclosed – unlike many private lobbying efforts. Grant applications follow strict rules and public calls for proposals, and are evaluated independently, and audited strictly.

### **8. A healthy democracy needs a healthy civil society**

Countries with strong democratic indicators have a strong civil society as a connective tissue.

### **9. Operating Grants are not a risk – they are a safeguard**

Attempts to label civil society as a “reputational risk” are misguided. CSOs are watchdogs and safeguard against vested interests.

## 10. Civil society is Europe’s early warning system and first responders

Whether responding to COVID-19, the war in Ukraine, or environmental disasters, CSOs are often first responders and long-term stabilisers.

---

### Did NGOs decide against making retroactive changes to their 2024 work programmes after the Commission asked them to suggest amendments in November 2024?

**Yes.** In November 2024, CINEA – the agency managing LIFE operating grants – asked beneficiaries to “screen” their 2024 work programmes against new [guidance](#). This guidance, although dated May 2024, was only shared with beneficiaries in November, when most of the year’s activities for most beneficiaries had already been carried out. Beneficiaries were then *invited* to request amendments to their grant agreements.

Together with the other LIFE operating grant beneficiaries, we concluded that such changes were neither necessary nor possible. Retroactively amending a nearly completed work programme is not legally feasible under the EU’s Financial Regulation or contract law in general. Amendments must be agreed by both parties in advance, before or at an early stage of implementation – not after activities have already been delivered.

---

### Does this mean NGOs failed to comply with the new guidance?

**Not at all.** The guidance states that “*presenting specific positions to an EU institution or some of its members [...] should be entirely the choice of the entity concerned but not mandated as a requirement or condition for Union financing.*” At no point did the European Commission instruct or require beneficiaries to carry out specific lobbying activities, so there was no breach of the guidance.

LIFE operating grant beneficiaries deal only with CINEA, the granting agency when it comes to management of the grants – never with the political level of the Commission or any civil servant working on specific policies or files when signing a grant agreement or submitting their work programmes. Commissioner Serafin confirmed this in his April 2025 reply [to the European Parliament](#), stating that “*The Commission did not instruct nor require non-governmental organisations (NGOs) to lobby Members of the European Parliament,*” and “*The work programmes may or may not mention, among other NGO activities, advocacy related to*

*environmental, climate and energy efficiency policies. The Commission does not impose these activities.”*

NGOs design their work programmes independently, through their own internal governance structures – typically in consultation with their members, boards and General Assemblies.

---

## **So what changed – have new contracts been amended?**

For the 2025 grant agreements (typically signed early in the year) and those still to be signed for 2026, many LIFE operating grant beneficiaries made sure to be crystal clear that we are not lobbying on anyone's behalf, but represent the interests of citizens organisations. This was done to avoid any scope for misinterpretation, not because lobbying was ever a requirement. As Commissioner Serafin [confirmed](#) – and the European Court of Auditors also [found](#) – beneficiaries have never been instructed or obliged by the Commission to carry out specific lobbying activities.

What has not changed is the substance of our work. NGOs continue to act on the priorities defined by their members and governance bodies. Advocacy remains a central pillar, bringing citizens' voices into EU policymaking and presenting evidence-based demands to decision-makers. This is precisely why European civil society networks exist, and how they contribute to an open, transparent, and democratic debate.

---

## **How is the new guidance affecting NGOs' work?**

**In practice, it does not.** The European Commission never mandated specific advocacy or lobbying activities, and NGO LIFE beneficiaries would never accept implementing activities on request. Beneficiaries continue to set their own priorities and work programmes through their internal procedures, just as before.

Our role remains unchanged, and we are committed to making effective contributions to EU environmental and climate policy, as outlined in the LIFE Regulation. The LIFE programme has provided operating grants to environmental NGOs for decades, and the nature of our activities remains broadly the same.

In a recent answer to the European Parliament, [Commissioner Roswall confirmed this](#): “NGOs activities financed under the LIFE programme did not breach any legal framework, as also the recent audit of the European Court of Auditors ‘Transparency of EU funding granted to NGOs’ confirmed. **NGOs are free to implement their activities, including advocacy activities.**”

---

## Isn't this a scandal?

**No.** Our grant agreements already state clearly that our activities are our own and not determined by the Commission. On top of that, there is ample evidence for:

- **No misuse of funds.** The [European Court of Auditors](#) found none. It made suggestions on how the European Commission can provide better information on grantees and a clearer definition of 'NGOs', and both these recommendations are supported by LIFE beneficiaries and the broader NGO community. We are in favour of more transparency and the Commission providing information on all beneficiaries – NGOs, companies, business associations, research organisations and others – in a transparent way, and to develop a stronger definition of 'NGOs' so that no for-profit interest groups can use the label for their interests.
- **No instruction to lobby:** The [Commission confirmed NGOs were not instructed to lobby](#) and that they are free [to implement their activities, including advocacy](#) activities. The European Parliament reaffirmed the legality and legitimacy of NGO advocacy.
- **No political interference:** Politico Europe [examined 27 NGO contracts](#) and found no evidence that the Commission made EU funding conditional on promoting the Green Deal. More broadly, there is no evidence that the Commission at the political level has ever interfered in LIFE operating grant work programmes, which are developed independently through NGOs' own governance processes. Allegations of interference have never been backed up by evidence – because none exists.

*What remains is a political narrative, not a factual one.*

---

## Back to Basics: What is the LIFE Programme?

The **LIFE Programme** is the European Union's flagship funding instrument for environmental and climate action. For the 2021-2027 funding period, the programme will provide €5.4 billion (approximately €771 million annually) to support projects that protect the environment and combat climate change. This accounts for just **0.3% of the EU's total budget** for the period.

The majority of LIFE funding is directed towards **on-the-ground initiatives**, particularly in nature conservation and climate action. This includes significant support for Natura 2000, the EU's network of protected areas. Only €15.6 million is allocated to NGOs through so-called operating grants (see below).

---

## Why do environmental NGOs receive funding from the European Commission (and other institutions)?

Civil society engagement is a cornerstone of participatory democracy, enshrined in the **Treaty on European Union (TEU)** and the **Aarhus Convention**.

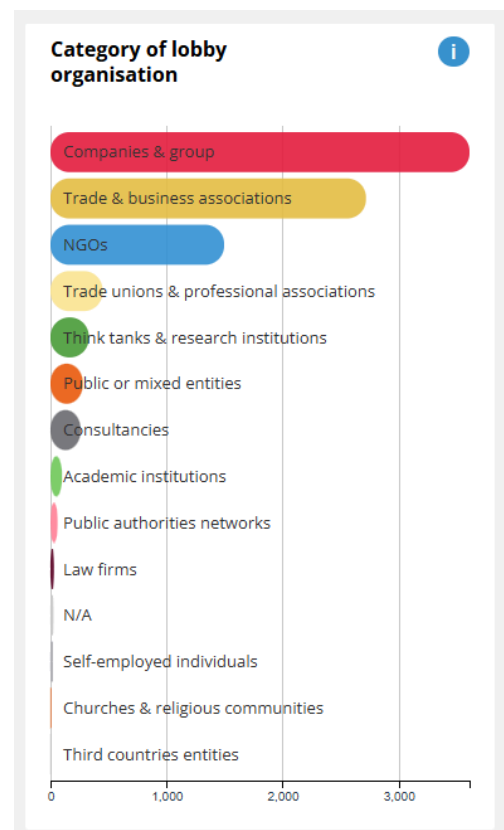
Civil society organisations are the backbone of European democracy, essential for bridging the gap between EU policymakers and citizens, safeguarding transparency, nurturing trust, and driving solutions to urgent challenges like the triple climate, biodiversity and pollution crises. Their active involvement is critical to maintaining the EU's democratic legitimacy and its connection to the very people the EU serves.

Unlike resource-rich actors such as foreign governments, multinational corporations, and business associations, European citizens and their civil society organisations often lack the means to consistently participate in public dialogue at the European level. To address this imbalance, the EU provides support to NGOs through operating grants and access to EU-funded projects. This helps level the playing field and ensures that diverse voices contribute to the decision-making process.

One such mechanism is the [LIFE Operating Grant](#), which allows environmental organisations to operate effectively at the EU level. This grant, established under the “[LIFE Regulation](#),” was approved with broad political support from both the European Parliament and the Council of Ministers.

- **Transparency and Accountability:** All funding is fully transparent, with recipients publicly disclosed and held accountable for their activities.
- **Democratic Values:** Supporting civil society is profoundly democratic. Without this funding, only well-resourced corporate interests would dominate the EU policy space, leaving critical societal issues – such as environmental degradation, pollution, and climate change – underrepresented.

Investing in operating grants for civil society ensures that the voices of citizens and diverse stakeholders are heard, safeguarding democratic participation and fostering a more balanced policymaking process at the EU level.



Source: Transparency International, [integritywatch.eu](https://integritywatch.eu), 9 June 2025

Even with this support, NGOs cannot match the financial and lobbying resources of corporate actors. Recent research by Transparency International highlights this disparity: corporate lobbyists account for 67% of all meetings with the European Commission, while NGOs make up only 16%, demonstrating the significant imbalance in access and influence.

---

## **How much LIFE funding do NGO receive through operating grants, and how does this compare with other lobby groups?**

A small share of the LIFE funding – €15.6 million annually – is allocated to operating grants for environmental NGOs and civil society organisations (see below). This represents only 0.006% of the EU's total annual budget. LIFE beneficiaries can currently receive up to €700,000 annually through this operating grant.

In comparison, in 2024, the 50 corporations with the largest lobbying budgets collectively spent almost €200 million on EU lobbying – two-thirds more than in 2015. Over two-thirds of entries in the EU Transparency Register represent commercial interests, far outnumbering and outspending other societal sectors.

For instance, the chemical industry association CEFIC operates with an annual budget of €44 million and employs 160 staff. Such vast resources give business lobby groups a significant advantage in shaping political debates and influence over policies. This imbalance can occur at the expense of broader societal priorities, including social justice, a healthy environment, and other public interest concerns. See [EU Lobby Report](#).

---

## **Are environmental NGOs funded by the European Commission to lobby the European Parliament on the Commission's behalf?**

**Absolutely not.**

Environmental NGOs are entirely independent of the European Commission's priorities or interests. For LIFE beneficiaries, our work programmes reflect our own organisational priorities and are approved by our membership, not EU institutions.

The funding received, including from the European Commission (co-financed with other sources - this is a mandatory requirement), supports civil society's critical role in:

- Fostering democratic participation in the development and implementation of EU policies by amplifying the voices of citizens, including researchers, academia, small businesses, farmers, and local communities.

- Acting as a watchdog on the implementation of EU laws and legislative gaps, canvassing our members' expertise from the ground.
- Providing evidence-based solutions and sharing good practices from across the EU.
- Counterbalancing well-funded influence from corporate and foreign governmental lobbying that defends private interests.

The Commission neither sets the political priorities for grantees nor dictates their activities or positions on specific policy files. This independence is rooted in the EU Treaties, which mandate support for civil society to strengthen democratic governance (e.g., the Treaty on the European Union and the Aarhus Convention), as well as the LIFE Regulation, adopted by EU co-legislators, which states that civil society involvement is needed for supporting the green transition, and that operating grants are designed to help NGOs to make effective contributions to EU policy. In addition, the LIFE Programme specifically aims to “support the development, implementation, monitoring and enforcement of relevant Union legislation and policy on the environment”.

Recipients of these grants adhere to strict accountability and transparency standards, ensuring full compliance with EU regulations. Civil society funding is, and always has been, both legal and essential to the democratic process.

---

## **Do LIFE contracts oblige NGOs to carry out specific lobbying activities?**

Journalists at Politico Europe [have received 27 contracts](#) presented to the EU Parliament, and reported that in the 40 pages of conditions, there are no parts in which the Commission made the distribution of funds to NGOs conditional on promoting the Green Deal.

NGOs are at liberty to support or criticise the Green Deal and other EU policies as part of their independent strategy and as environmental watchdogs. The EU Commission does not oversee NGOs opinions and stances, and it is legally stated that it is not responsible for “the views and opinions expressed” by the NGOs as they “do not necessarily reflect those of the European Union”, a disclaimer we provide in every publication associated with these funds.

LIFE beneficiaries has never been asked by anyone in the European Commission, when concluding a Grant Agreement, to do anything in particular to work on any specific file or issue, or to lobby the European Parliament on any matter.

---

## **Is this all a secret?**

**No.**

Information about LIFE funding for NGOs is publicly accessible through the Transparency Register. All recipients are listed in the [Transparency Register](#), and their work, funding sources, and relevant activities are disclosed on their websites. This ensures full public visibility into their operations and objectives.

Operating grants are awarded through a competitive, thorough, and independent evaluation process based on the objectives and criteria outlined in the LIFE Regulation, the Financial Regulation, and the specific calls for proposals. Recipients strive to ensure the most cost-effective use of public funds, often attracting additional co-financing to maximise the added value of EU funding.

NGOs receiving EU funding are bound by rigorous accountability principles. They engage in regular monitoring, reporting, and auditing to demonstrate the transparent and responsible use of public funds. NGOs also undergo annual external audits, regular monitoring visits, and also additional external audits to ensure full compliance with EU regulations.

In short, the process is fully transparent, with multiple layers of oversight ensuring the responsible use of EU funding.

A list of all NGOs receiving a LIFE operating grant is [available here](#).

---

## Why are some MEPs targeting eNGOs and the LIFE Programme?

Civil society is facing unprecedented attacks on its role and space within the European project – despite the European Commission’s own [Political Guidelines](#) highlighting the need *“to step up [the European Union]’s engagement with civil society organisations [and to] ensure civil society is better protected in its work,”* and Commissioner McGrath’s [Mission Letter](#) (for democracy, justice, rule of law and consumer protection) which stipulates that *“you will step up engagement with civil society on democracy, rule of law and related issues”* and set up a Civil Society Platform *“to support more systematic civil dialogue and work to strengthen protection of civil society, activists and human rights defenders in their work.”* ...

This targeting coincides with disinformation waves and mounting resistance to the European Green Deal from powerful vested interests. Some EU lawmakers, prompted by these corporate interests or short-sighted political gains, are actively seeking to dismantle or revise Green Deal policies, which environmental NGOs have strongly supported and advocated for.

A [recent analysis by Transparency International](#) revealed that MEP Monika Hohlmeier, who raised the question of NGO funding in the European Parliament plenary, [is on the payroll of a major corporate holding company](#). The EPP MEP makes a striking €75,000 per year, on top of her MEP salary, for serving on the Supervisory Board of BayWa, an international corporation active in sectors such as agriculture, construction, and energy.

---

## **How exactly do the contracts with the Commission come about, and do they contain obligations to carry out lobbying activities?**

Our work programmes are drafted completely independently, without any interference from the EC or any external stakeholders. To apply for the LIFE operating grant, we have to submit a very detailed application outlining our objectives, planned activities and KPIs, and this work programme is then added as an annex to the contract, thus becoming part of it - and it is the basis for our reporting to the Commission to demonstrate that we spent the money in the way we had intended.

So when critics say that the Commission 'obliges' NGOs to carry out lobbying activities, this is a misrepresentation of how these contracts come about: WE set our objectives and activities and THEN ask for funding on the basis of these work programmes - not the other way around!

Commissioner Serafin also clarified this procedure in his response to a parliamentary question (see below).

---

## **Budget Commissioner Piotr Serafin has admitted that some financing from the EU's €5.4 billion environmental programme LIFE may have been "inappropriate". What do you have to say on this?**

Since this statement, Commissioner Serafin has had to correct his stance. Answering a parliamentary question on the subject, in April 2025, [he clarified the procedure as follows](#):

*"The Commission did not instruct nor require non-governmental organisations (NGOs) to lobby Members of the European Parliament. NGOs independently propose their work programme of activities in the policy areas indicated in the LIFE Regulation, in response to a call for proposals published by the Commission. The call for proposals does not require any lobbying activities towards the Members of the European Parliament or other stakeholders. The work programme is then annexed to the operating grant agreement signed between the Commission and the NGO. The NGO has the contractual obligation to properly implement the work programme it proposed, while the Commission has the obligation to pay the amount of the grant.*

*The work programmes may or may not mention, among other NGO activities, advocacy related to environmental, climate and energy efficiency policies. These activities are not imposed by the Commission. The Commission does not prescribe the specific activities to be carried out by the NGOs in their work programme, nor does it instruct them to support any specific positions. According to the grant agreements, any opinions expressed, and activities carried out remain*

*the sole responsibility of the NGOs. Civil society entities remain fully autonomous and free to establish their own views on all policy matters.”*

---

**In April Commission stated that “in some cases work programmes submitted by the NGOs and annexed to the Operating Grant agreements contained specific advocacy actions and *undue lobbying activities*”. What is meant by this?**

**There is no evidence of such ‘undue activities’.**

In the context of European institutions, ‘undue lobbying’ refers to attempts to influence decision-making processes in ways that are unethical, non-transparent or illegal, such as providing misleading information, paying for access or using lavish gifts to achieve legislative outcomes. However, the [European Court of Auditors’ special report](#) (ECA report) on the transparency of EU funding from 7 April 2025 confirmed that there was no evidence of irregularities or misuse in terms of how NGOs are selected or how EU grants are used.

The Commission has so far failed to produce any evidence of LIFE grantees’ activities that breach existing ethics requirements, mandatory transparency rules or other rules on lobbying, which would support this accusation of ‘undue lobbying’.

Several MEPs from Renew, S&D and the Greens therefore submitted a [parliamentary question in May 2025](#), inviting the Commission to provide this evidence, or otherwise to rectify its statement to repair the reputational damage caused to the NGOs.

---

**A report by the European Court of Auditors (ECA) report finds that EU funding for NGOs is “too opaque”. What is your response?**

The ECA report on NGOs transparency from April 2025 indeed concludes that EU funding granted to NGOs suffers from a lack of transparency. However, it targets mostly the European Commission, stating they did not properly disclose certain EU-funded advocacy activities such as lobbying, and that there are no active checks to ensure that the funded NGOs respect EU values.

---

## A report of the European Court of Auditors found that 34% of NGOs do not declare their sources of income. Surely this is intransparent?

The [report you are referring to](#) assessed whether the EU Transparency Register is a useful means of providing transparency on the lobbying activities in EU policy and decision-making – so the **findings are limited to the information that is provided in the Transparency Register (TR)**. And indeed, it found that 34% of NGOs in the TR do not list their full sources of income, mostly due to the rules of the register.

However, we want to point out that all Green 10 organisations declare their full funding sources in our entries in the TR. In addition, for those of us based in Brussels, we are, according to Belgian law, obliged to disclose our sources of funding, and we do this in our annual report. We also submit our approved and audited annual accounts to the Belgian National Bank.