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WOMEN AGAINST VIOLENCE EUROPE
WAVE Network and European Info Centre against Violence

AgoraEU CERV+ Strand Regulation: Joint recommendations from gender equality civil society organisations January 2026

As civil society organisations working to advance gender equality, LGBTI rights, women's rights, sexual and reproductive health and rights, and combating sexual and gender-based violence in Europe, we [welcomed](#) the proposal of the European Commission for the CERV+ strand of the AgoraEU programme in the future MFF 2028-2034.

As the negotiations on the Regulation progress, we urge the European Parliament and the Council of the EU to support the following provisions:

- Safeguard the overall amount proposed for CERV+

The challenges to democracy, the rule of law and fundamental rights are growing across the Union, while civil society faces unprecedented restrictions and funding cuts. In the 2023 survey by the European Union Agency for Fundamental Rights, 75.4% of CSOs working on fundamental rights and democracy expressed fear that the lack of funding and further cuts threatened their work¹. The Council of Europe Commissioner for Human Rights recently alerted to the severe funding crisis facing civil society organisations across Europe².

The CERV programme has been instrumental in enabling civil society organisations across the EU to promote equality and fight all forms of discrimination, and to sustain, support and further develop open, rights-based, democratic and inclusive societies based on the rule of law. We therefore welcome the proposed doubling of the CERV+ budget in the next MFF as a strong political signal of the Union's commitment to fundamental rights. However, even doubled, the CERV+ Strand would constitute only a small sliver of the total EU budget: AgoraEU is proposed at about €8.58 billion, of which €3.593 billion is allocated to the CERV+ Strand, against a total MFF envelope of nearly €2 trillion. This

¹ https://fra.europa.eu/sites/default/files/fra_uploads/report-key-findings-fra-civic-space-consultation-covering-2023.pdf

² <https://www.coe.int/en/web/commissioner/-/alarming-trends-the-crisis-facing-civil-society-and-human-rights-defenders-in-europe>

means that the CERV+ Strand would represent roughly 0.18 % of the entire proposed MFF. At the same time, experience shows that this increase will still not suffice to meet the overwhelming demand. According to the European Commission's 2024 Charter report, some current CERV calls are oversubscribed to such a degree that only 8% to 17% of applications are funded³, meaning that for some calls, up to 92% of aligned initiatives have been left without financial support. In 2021-2023, the overall CERV success rate was 30%⁴. As the Commission notes, "many excellent applications cannot be funded due to budget limitations".

Civic space is shrinking across the EU, and civil society organisations face increasing hostility and concerted actions to undermine their legitimacy and hinder their work, including: disinformation and defamation, threats and attacks, Strategic Litigation Against Public Participation (SLAPPs), excessively burdensome regulations and restrictive legislation, including so-called 'foreign agent laws'. Worryingly, these tactics are no longer confined to national contexts but are increasingly replicated at the EU level, targeting in particular the advocacy work of CSOs and their operating grants.

There is therefore an urgent need to safeguard and reinforce the CERV+ budget to support the important role civil society organisations play for a vibrant and democratic society.

- Improve the wording on general objectives and specific thematic lines to be inclusive and comprehensive

AgoraEU, including CERV+, is listed as one of the programmes that aim to support gender equality and mainstream gender in the proposed 'Regulation establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities' (Performance Framework)⁵, as specified in Article 7 on Gender Equality and Annex IV. Gender equality should therefore be added as a general objective of AgoraEU including CERV+.

In addition, thematic lines must reflect the real needs of communities and services on the ground. Using 'sexual and reproductive health and rights' (SRHR) in full, explicitly adding lesbophobia to the list of discrimination and violence to be addressed by the programme, and recognising women's specialist services (WSS) are not only questions of wording but of visibility, protection and access to justice. These elements directly affect communities facing the harshest rights violations, discrimination and violence. Making them explicit strengthens the Programme's inclusiveness and ensures that EU action responds where it is urgently needed, in line with the Union's obligations under the Charter of Fundamental Rights, the Istanbul Convention and the Directive (EU) 2024/1385 on combating violence against women and domestic violence.

³ https://eur-lex.europa.eu/resource.html?uri=cellar:9a46813a-86e1-11ef-a67d-01aa75ed71a1.0001.02/DOC_1&format=PDF

⁴ <https://www.cerv.at/dam/jcr%3A0b835c7f-5f28-4305-ab5f-ee41b295da02/CERV%20Statistiken%202021%20-%202023.pdf>

⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52025PC0545>

As in the current CERV [Regulation](#) (see Recital 12), and the [Roadmap for Women's Rights](#), it is crucial to ensure the inclusion of the full spectrum of 'sexual and reproductive health and rights'. Activities carried out to defend and advance sexual and reproductive rights must continue to be supported by CERV+, as fundamental human rights essential to gender equality.

'Lesbophobia' reflects the intersection of sexism and homophobia and results in specific patterns of discrimination that are not captured by the broader term 'homophobia.' Coherently with the mention of other forms of LGBTI-phobia, including lesbophobia would allow to address the persistent violence and exclusion faced by persons who are or are perceived as LBQ women. Explicitly naming lesbophobia strengthens the inclusiveness of the Programme and ensures compliance with the Charter of Fundamental Rights and the Union's equality commitments.

Women's specialist services have been identified by GREVIO as the most effective and best-equipped actors to prevent and tackle gender-based violence, and funding for these organisations is a fundamental requirement under the Istanbul Convention⁶.

- Safeguard Daphne's dedicated purpose

The structure and integrity of the Daphne strand must be safeguarded to ensure its specific gendered approach is not diluted. This requires explicit guarantees that resources allocated under this strand reach gender equality, grassroots organisations — including those focused on SRHR, LGBTI rights, and women's rights, such as women's specialist services — that directly prevent and combat all forms of gender-based violence.

Recent funding patterns undermine this mission. Increasingly, Daphne funding has been awarded to research institutes or organisations lacking the specialised gendered expertise and frontline experience essential to effectively address gender-based violence. This diverts critical resources away from the grassroots organisations that are the intended primary beneficiaries.

Explicit recital-level protection is essential. The previous CERV Regulation included a dedicated recital (Recital 13) affirming the need for an independent budget allocation for activities implementing the specific objective of preventing and combating all forms of gender-based violence. The current CERV+ proposal lacks this explicit recital-level commitment, creating ambiguity that risks gender-neutral interpretations of Daphne's scope and eligibility criteria. Therefore, the resolution must include guarantees to preserve Daphne's dedicated purpose and ensure funding reaches its intended beneficiaries.

⁶ GREVIO, Mid-term Horizontal Review of GREVIO baseline evaluation reports, Council of Europe, February 2022, available at: <https://rm.coe.int/prems-010522-gbr-grevio-mid-term-horizontal-review-rev-february-2022/1680a58499>

- Ensure a fair and appropriate distribution of funds between the different thematic strands

AgoraEU including CERV+ is listed as one of the programmes that aim to support gender equality and mainstream gender in the proposed 'Regulation establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities' (Performance Framework)⁷, as specified in Article 7 on Gender Equality and Annex IV. CERV+ should therefore comply with Article 33(2), point (f), of Regulation (EU, Euratom) 2024/2509⁸, and shall "be implemented taking into account the principle of gender equality and in accordance with an appropriate gender mainstreaming methodology". To ensure effective compliance with these obligations, earmarking of funds within CERV+ is necessary, as it provides a concrete and effective mechanism to operationalise gender mainstreaming and to guarantee that gender equality objectives are adequately resourced.

According to the European Commission's evaluation of the CERV Programme between 2021 and 2023, the Equality and Daphne strands are the most underfunded compared to the demand⁹. These strands are currently the least funded among the CERV strands: together, their combined amount represents only around 25% of the overall CERV amount. They also show the sharpest levels of oversubscription. Under the Equality strand, out of 999 proposals - the highest number of applications across all strands, only 116 were selected - this represents a success rate of only 15%. Under the Daphne strand, out of 484 proposals, only 97 were selected - this represents a success rate of only 21%. In comparison, other strands are better funded and get better success rates (for instance, the success rate for the Union Values strand is 54% and the overall success rate for CERV is 30%).

This means that the majority of high-quality and eligible applications under the Equality and Daphne strands remain unfunded, which illustrates the structural under-financing of equality and gender-based violence work. According to the Commission in its CERV interim evaluation, "a funding gap on the strands for equality, rights and gender equality, and for combating violence against women and children, is present and may limit the ability to fulfil the objectives of these CERV strands"¹⁰.

SRHR, LGBTI, WSS and gender equality CSOs across the EU are facing growing financial pressure and uncertainty as a result of global and European funding cuts. The recent reinstatement of the Global Gag Rule and freeze on USAID contributions had repercussions on many sectors, including health, LGBTI and gender equality CSOs also in Europe – including through US funding cuts to UN agencies like UNFPA or WHO. Several European governments have started to divert funds towards other priorities such as security, defense and other economic interests. These developments have worsened an already precarious operational environment.

⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52025PC0545>

⁸ <https://eur-lex.europa.eu/eli/reg/2024/2509/oj/eng>

⁹ <https://www.cerv.at/dam/jcr%3A0b835c7f-5f28-4305-ab5f-ee41b295da02/CERV%20Statistiken%202021%20-%202023.pdf>

¹⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025DC0266>

The impact of the financial weakening of human rights organisations and defenders, including SRHR, LGBTI and gender equality CSOs in Europe is worsened by the increased funding for anti-rights actors in the region¹¹, who are actively seeking to reverse decades of progress on SRHR, gender equality and LGBTI rights. In most cases, such attacks from anti-rights actors are only at first sight about SRHR, women's rights or LGBTI people's rights, but their broader objective is to undermine the EU values of fundamental rights, democratic principles and the rule of law, and ultimately to dismantle the EU¹². The anti-rights agenda represents a security threat and a destabilisation risk for the EU as a whole. In addition, research by the FRA indicates that LGBTI, SRHR and women's rights civil society organisations and human rights defenders face particularly hostile environments, and are among the most targeted by threats and attacks in the EU¹³. The report also shows that certain organisations and defenders, including youth organisations and young human rights defenders, face structural barriers that hinder their meaningful participation, and render them more vulnerable to threats and attacks.

It is therefore crucial that a fair and appropriate share of the CERV+ budget be dedicated to and earmarked for the Equality and Daphne strands, for the defence and advancement of LGBTI people's fundamental rights, women's rights, SRHR, gender equality, and combating gender-based violence.

- Earmark funds for civil society organisations

One of the main objectives of the CERV+ Strand is to support civil society, and this should be reflected in the Regulation to ensure that civil society organisations remain the primary beneficiaries of the programme.

The current CERV Regulation specifies that at least 50% of the amounts set out for the Union Values strand and the Equality strand shall be allocated to support activities carried out by civil society organisations. In 2021-2023¹⁴, civil society organisations received 79% of the CERV Programme's amounts. The earmarking of funds for civil society organisations shall be reaffirmed and reinforced. We would propose to raise this percentage to at least 85% of the CERV+ strand amounts - and this minimum percentage should apply both across the strand as a whole and within each substrand.

¹¹ <https://www.epfweb.org/node/1147>

¹² See the MCC Brussels and Ordo Iuris 'factsheet' on 'the Great Reset': <https://vsquare.org/wp-content/uploads/2025/03/MCC-Ordo-Iuris-Factsheet.pdf>. National examples of this include the Hungarian attack on freedom of assembly through the Assembly Act, or the attack on the primacy of EU law through the constitutional amendments in Slovakia.

¹³ <https://fra.europa.eu/en/publication/2023/civic-space-2023-update>

¹⁴ <https://www.cerv.at/dam/jcr%3A0b835c7f-5f28-4305-ab5f-ee41b295da02/CERV%20Statistiken%202021%20-%202023.pdf>

- Safeguard core funding

CERV offers unrestricted core, sustainable, long-term funding to civil society organisations (CSOs) through operating grants (four-year framework partnership agreements and annual operating grants). These grants enable organisations to work strategically and outside short-term project cycles. Such structural funding is both rare and indispensable to allow for a strategic and independent medium- to long-term vision and functioning of CSOs.

Operating grants allow CSOs to operate with greater flexibility and adaptability to developments on the national and EU levels and to ensure sustainability, and to maximise their impact. They help CSOs plan for the long term, retain skilled staff and reduce turnover, deliver higher-quality projects with greater efficiency, increase synergies between projects and leverage other sources of funding. The added value of operating grants is therefore exponential. Operating grants should therefore be specifically mentioned in the CERV+ Strand Regulation.

The Council of the EU, in its 2023 [Conclusions on civic space](#), called on the European Commission to continue core funding for civil society organisations.

- Specifically mention advocacy, watchdog activities, strategic litigation and campaigning as eligible activities under CERV+

Advocacy, watchdog functions, strategic litigation, campaigning and communication are indispensable activities for civil society organisations to expose rights violations, hold institutions accountable, and give voice to marginalised communities. Explicitly listing these activities in the Regulation, as is the case in the current CERV Regulation in Recital 22 and Annex 1, 6.b), would ensure that organisations can continue this essential work, especially in times of shrinking civic space and democratic backsliding. This would be in line with the CERV programme, which has long recognised that such activities are the backbone of civil society's contribution to the protection of Union values.

The Venice Commission's Joint Guidelines on the Freedom of Association¹⁵ state that: "Associations shall have the right to freedom of expression and opinion through their objectives and activities", and that "Associations shall have the right to participate in matters of political and public debate, regardless of whether the position taken is in accord with government policy or advocates a change in the law".

The EESC in its Opinion¹⁶ on AgoraEU calls for explicit recognition of advocacy as a core part of civil society organisations' work and their role in policymaking to strengthen democracy and resilience.

¹⁵ [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2014\)046](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2014)046)

¹⁶ <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/agoraeu-and-justice-programmes>

- **Maintain direct management**

Direct management is essential to guarantee that EU resources are distributed transparently and without political interference. It allows grassroots and smaller organisations, often excluded at the national level, to access funding on equal terms and to remain independent in their defence of rights and democracy. Crucially, direct management shields the Programme from shifts caused by national political changes, ensuring continuity of support for those protecting Union values on the ground.

- **Safeguard regranting**

The regranting scheme ('financial support to third parties') facilitates access to EU funding for organisations at the national and local levels, through EU-level intermediaries. The scheme therefore enables the EU to reach and support smaller organisations at the national and local level, which is critical, given the increasingly difficult contexts in which they operate. Many challenges the EU faces are rooted at the national and local level, and these actors are best placed to counter them in their national contexts.

The Council of the EU, in its 2023 [Conclusions on civic space](#), called on the European Commission to continue financial support to third parties for civil society organisations.

- **Ensure synergies do not impede eligibility for substrands**

The European Commission highlights the importance of synergies between the three strands of AgoraEU, however, this aim should not hinder project proposals that want to focus exclusively on the objectives of only one of the strands, i.e. if an organisation applies for CERV+ funding for work on fundamental rights and rule of law, they should not be obliged to also have a culture or media element to be eligible for funding.