

Navigating through Uncertain Times: Civil Society in Central and Eastern Europe

Policy Recommendations

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By Ulla Pape and Filip Pazderski

Civil societies in Central and Eastern Europe (CEE) have been going through turbulent times. In recent years, civil society organisations (CSOs) and activists have reported a deteriorating political climate and an increase in policy restrictions that have been hindering their everyday work. CSOs have been confronted with a tightening of legal regulations and are finding it more and more difficult to obtain funding, gain public support and connect to a broader society. In the international research literature, this trend is discussed as the ‘closing’ or ‘shrinking’ space for civil society¹. The specific changes affecting CSOs in the Central and Eastern Europe vary depending on country and policy field. However, general trends affecting civil society are comparable throughout the region.

A systematic analysis of publications and other available resources (i.e. reports, research data, policy documents, etc.) from the region was conducted to investigate the challenges CSOs have been facing, as well as the organisational solutions they have developed in response. These policy recommendations focus on civil society development in eight countries – Bulgaria, Croatia, Czech Republic, Hungary, Poland, Romania, Slovakia and Slovenia – and is based on information sources spanning the years 2013 to 2020. While previously visible challenges have been exacerbated by the COVID-19 pandemic, the crisis also gave rise to new responses by CSOs. The pandemic has triggered new challenges specific to civil societies, together with the responses that CSOs have developed.

The most important challenges for a civil society in the CEE region include legal and regulatory restrictions, a decrease in funding opportunities for CSOs, including problems in accessing the European structural funds, and difficulties for CSOs in promoting

public support, connecting to their constituencies and shaping a positive image of civic activism. Overall, the conditions for civil societies in the region have deteriorated since 2013, as the political climate has grown more antagonistic and societies have become more politically polarised. The political restrictions imposed on civil societies have also limited the ability of CSOs to engage in advocacy and to influence law-making. In many CEE countries, politicians took advantage of the low levels of public trust towards CSOs and used smear campaigns to discredit individual organisations and civil society at large. CSOs have been accused of not working for the public good, of lacking internal transparency and even of being harmful to their societies by allegedly acting as “foreign agents.” Moreover, politicians in several CEE countries have accused CSOs of interfering in party politics or even directly cooperating with the political opposition.

The extent and scale of restrictions on civil societies differ across the region. Overall, one can observe that government attitudes towards the civil society in the CEE region have changed from a cooperative to a more antagonistic or confrontational approach. In particular, organisations working on human rights, migration and environmental issues have been targeted by governmental pressure. Smear campaigns and other measures to discredit civil societies have not only harmed individual CSOs but have led to a general rise in distrust and a deepening of societal cleavages. As a result, CSOs in the CEE region find it increasingly difficult to connect to their constituencies and generate public support.

This overall trend to restrict the civic space in Central and Eastern Europe was reinforced by the difficulties that the civil society experienced in the course of the

¹ Poppe, A. & Wolff, J. (2017). The Contested Spaces of Civil Society in a Plural World: Norm Contestation in the Debate about Restrictions on International Civil Society Support, *Contemporary Politics*, 23:4, 469-488.

transition after 1989. After the end of the Cold War, CSOs in Central and Eastern Europe were granted legal status and went through a process of organisational development based on the Western (primarily Anglo-Saxon) model of non-governmental organisations acting as intermediaries. As a result, in all countries of the region, the number of CSOs has increased, and their organisational capacities have grown. In this process, funding from external donors in the framework of external democracy promotion and bilateral assistance was crucial. This, however, had a side effect of creating donor dependencies among CSOs in the CEE region. Moreover, the level of public funding and private donations for civil society remained low, as CSOs faced difficulties in creating support and establishing links with society. As donors operated on the basis of their own experiences in Western European societies, some support programmes did not fully match local needs. This in turn led to a persistent gap between a small number of well-funded and well-connected professional organisations and other smaller, less professionalised organisations with a limited access to international funding.

The dichotomy between different parts of civil society persists until today and is reflected in the funding situation of CSOs in the region. This is also mirrored in the differential access to EU structural funds (financed from the European Social Fund, the European Regional Development Fund and the European Agricultural Fund for Rural Development, distributed at the national level in each member state), as only a very small number of CSOs have the capacity to benefit from this type of funding. The resulting scarcity of funding and lack of stability have a negative impact on the organisational development of CSOs in the region, as the financial instability creates a high staff turnover and lack of opportunities for a professional development. Paradoxically, the changing labour environment is detrimental for civil society development in the region. Due to relatively low unemployment rates and an increase in net salaries, CSOs find it difficult

to provide competitive remunerations and job stability for their employees and, therefore, tend to lose many of their most experienced staff members, while struggling to recruit new ones.

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However, civil societies in Central and Eastern Europe have not only witnessed restrictions of the civic space. CSOs have also initiated a lot of innovative solutions, including new approaches to communication and fundraising, as well as attempts to increase credibility and transparency. For instance, organisations have used coalitions and networks to unite forces, create broader support and improve their public image. We have created a collection of inspiring solutions from CSOs throughout the region, with the aim of developing “good practices” for a broader discussion between re-

searchers and civil society practitioners. This collection of innovative solutions from the region is divided into four areas:

- **Coalition-building**

Civil society coalitions were established at the local, national and European level, including, for example, “[Civilisation](#)” in Hungary (Civilizáció), “[Save Karadere Beach](#)” in Bulgaria, the “[Not in Our Town](#)” (NIOT) network in the city of Banská Bystrica, Slovakia or the pan-European [Civil Society Europe](#) initiative.

- **Fundraising**

Many CSOs in the region have developed new fundraising strategies, including two interesting examples from Poland – the constituency building activities of the [Citizens Network Watchdog](#) and the [Civic Fund](#), which is fully based on individual donations. The Civic Fund was initiated by civic activists to support CSOs in dealing with challenges, especially governmental pressure. The fund specifically focuses on activists and organisations working to improve the quality of democracy.

- **Communication**

CSOs set up media campaigns to improve the situation of CSOs in their countries and in the region, e.g. “[Posilujeme Česko](#)” from Czechia (“We Strengthen the Czech Republic”), “[Organizacje społeczne. To działa!](#)” from Poland (“Social organisations. That works!”) or “[Mar Nam Je](#)” from Slovenia (“We Care”).

- **Monitoring**

CSOs established activities to monitor the situation of civil society in the EU. Monitoring activities include the [Civic Space Watch](#) or the Spanish collective “[Defender a quien defiende](#)” (“Defend Those Who Defend”) that are working specifically on the freedom of assembly issue. Both activities originated outside the CEE area, but the former also covers the countries of the region, while the latter can be an inspiring example for the CSOs in the region.

By transferring new strategies and approaches to a broader group of organisations, civil society actors can generate new ideas for counteracting the problems faced by CSOs in the region. CSOs can thus contribute to strengthening their roots within society and expanding the diversity of their funding. New fundraising strategies for CSOs in the region include crowdfunding, the creation of philanthropic endowments and the development of social enterprises and cooperatives. In this way, civil societies can emerge

Organisations have used coalitions and networks to unite forces, create broader support and improve their public image

even stronger from the current troubles, though financial resources are needed to nurture appropriate skills and competences among a wider group of organisations. It is important to note that, at least for some of the CSOs in Central and Eastern Europe, the current financial challenges pose an existential threat. Therefore, in times of shrinking access to public funding at the national level, greater financial possibilities must be created at the European Union level, notably for CSOs whose work is crucial for the preservation of core democratic values. Mechanisms like these will enable citizens to act effectively in their own countries, and to promote and defend the values laid out in Article 2 of the Treaty on the Functioning of the European Union (TFEU).

These policy recommendations are not to be considered a conclusive analysis but rather a contribution to an ongoing debate intended to further the capacities of civil societies in and beyond the region. Based on the analysis of literature and policy documents, we propose a set of policy recommendations, which are meant as suggestions for protecting (and partly restoring) the civic space in the CEE area, thus advocating for a positive change in the region. We have formulated policy recommendations for CSOs, umbrella organisations and networks in Europe, national governments in the CEE region, donor organisations and European Union institutions.

Recommendations for CSOs in Central and Eastern Europe

• Stress transparency, professionalism and openness of CSOs

CSOs are often unjustly criticised for using public funds without producing sustainable results or for not truly working in the public interest. Civil society needs the efforts of individual organisations and sector-wide solidarity to counteract these accusations. To increase transparency and accountability, CSOs can publish project reports and disclose their funding resources on their websites, as well as refer to transparency and accountability standards, e.g. the International Committee on Fundraising Organisations. They can also develop internal transparency procedures and use social return on investment (SROI) approaches to make their societal impact visible, as far as possible for each organisation, according to its size and operational capabilities. Although these recommendations might seem obvious, they help defend civil societies against accusations of not being open enough to the public. By stressing transparency, as well as the openness of internal management procedures and project results, CSOs can show how they use public money and what they achieve for society.

• Overcome cleavages within the civil society by underlining joint civic values

Only joint actions can protect civil society against marginalisation and political repression. Many current campaigns against civil society in the region are built upon a politically motivated division between “good” and “bad” CSOs. National governments tend to support convenient CSOs and, at the same time, seek to control those that do not align with government objectives or formulate critical positions. This differential treatment undermines civil society as a connected, pluralistic public space and weakens civic values, such as solidarity and social responsibility. Despite social and political differences in the region, CSOs

can seek a dialogue with a broad range of societal actors and try to overcome these cleavages by stressing joint civic values across the political spectrum. This approach presents a great challenge, given the plu-

rality of civic positions in each country of Central and Eastern Europe. It is, however, a great strength of CSOs to find commonalities and show what holds them together.

- Show solidarity with CSOs that have become victims of smear campaigns and act against attempts to delegitimise civil society and civic values

Given the worrying increase of smear campaigns against CSOs and other attempts to delegitimise civil society in Central and Eastern Europe, it is of great importance to show solidarity with targeted organisations and individual activists. Even if political objectives are different across each civil society, it is essential to make clear that civic engagement is a value in its own right. Targeted organisations deserve to be protected by everyone in the sector, regardless of their field of activity.

• Develop communication strategies and participatory approaches to involve citizens

Civil societies will remain weak, as long as they are not supported by citizens. CSOs can develop new communication strategies and participatory approaches to strengthen public support and intensify citizens' involvement. To do so, CSOs need to develop a new language that is less technocratic and more accessible for the public. This will be vital in communicating their objectives and achievements to broader parts of society. In their communication, CSOs should stress ownership and civic participation so that citizens recognise CSOs as a voice of their community. Ultimately, new communication strategies and public support will be the most efficient means for CSOs to counter politically motivated accusations that they are not working in the public interest.

CSOs need to develop a new language that is less technocratic and more accessible for the public

Recommendations for European CSOs, umbrella organisations and networks

- **Join forces and develop a new narrative on civil societies in Europe**

Civil societies in Europe need a new narrative. Why is a civil society important for Europe? What is its added value for European societies? For a long time, the added value of civil societies has been taken for granted. CSOs in the EU have been free to engage in their causes, but they have sometimes lost sight of the bigger picture. It is time to unite and nurture the potential of civil societies in shaping Europe's future. CSOs thus need to explain why civil societies have an important value for their societies and convince political decision-makers that they need to be supported, regardless of their political orientation. The activities undertaken by CSOs in response to the COVID-19 pandemic have clearly demonstrated their role in creating solidarity and social cohesion. To be relevant, CSOs need to be adaptive and active. They should not try to preserve the status quo, but rather show that they are able to contribute in addressing important societal issues. It is worth taking advantage of this momentum to build sustainable solutions for a future based on the lessons learnt during the pandemic².

- **Strengthen monitoring and communication activities to bring knowledge about the CEE region to the EU decision-makers and societies**

CSOs in Central and Eastern Europe are facing many challenges unknown to their counterparts in Western Europe. Monitoring and communication activities are crucial in informing EU decision-makers and societies about political developments and the state of civil society in the CEE region. Monitoring is an important tool for raising awareness and developing advocacy strategies across Europe. It can also help formulate

tailored public policies and support mechanisms for civil society organisations and activists in the region and across Europe. Many good monitoring initiatives already exist (some are mentioned in this paper – see above), and they need to continue to be nurtured and strengthened. Moreover, new opportunities have recently emerged for CSOs to act at the European level, such as the European Commission's annual Rule of Law Report, which involves stakeholder consultations and meetings with civil society actors in each of the EU member states³. It is important that CSOs are prepared to progress into the next stages of this process with well-evidenced observations and recommendations for the statements provided by individual governments.

- **Share information on organisational solutions across European countries**

Many useful examples of this practice are on the table. By addressing common challenges, CSOs can learn from counterparts in other European countries. It is important to share organisational solutions to strengthen CSOs across Europe. Umbrella organisations and European networks can play an important role in making organisational experiences available for all. Activities to undertake include developing guides with good practices, awarding prizes for the most interesting initiatives in a variety of categories and organising training sessions for civic activists from Central and Eastern Europe.

- **Develop new fora for a transnational discussion on the role of civil society in Europe**

A new narrative on civil society in Europe will not come about by itself. Existing transnational fora for discussing the future of civil society in the EU need to be strengthened and need to expand activities to include CSOs from all over Europe. Umbrella organisations and networks operating in the EU are vital for bringing CSOs together and providing space for

² See "Ten lessons learnt from COVID-19 crisis", European Civic Forum, Brussels 2020, <https://civic-forum.eu/position/lessons-learned-from-covid-19-crisis>.

³ See the 2020 Rule of Law Report at https://ec.europa.eu/info/policies/justice-and-fundamental-rights/upholding-rule-law/rule-law/rule-law-mechanism/2020-rule-law-report_en#targeted-stakeholder-consultation.

discussion. A good example is the Conference on the Future of Europe (but only after suitable adjustments and consideration of the broader role for European civil society) planned by the European Commission, and its counterparts initiated on behalf of civil society by the “Citizens Take Over Europe” coalition⁴ or group of European networks of organisations in a form of Civil Society Convention on the Future of Europe⁵. European networks should continue to put pressure on European institutions to include a broader voice from organised civil societies in planning and conducting this event. Should EU institutions remain stubborn and not recognise this request, organising a parallel series of civil society’s own events may be an alternative.

Recommendations to national governments in Central and Eastern Europe

- Acknowledge the societal value of CSOs in your country and stress commonalities instead of increasing societal cleavages

Organisations do not work for themselves but serve a purpose in society. Moreover, CSOs can be partners to public services and fulfil many important tasks. Governments would do well to recognise this. The societal value of civil societies is to provide public spaces where citizens can unite around shared interests. A free civil society is indispensable for societal self-organisation and innovation. Therefore, it is important for national governments to acknowledge the value of civil society and – despite political differences – stress commonalities instead of increasing societal cleavages that will only weaken the country, long term.

- Support volunteering, civic engagement and philanthropy as important societal practices

Volunteering, civic engagement and philanthropy are important societal practices. These activities also allow citizens to exercise their rights as citizens – rights that are enshrined in national constitutions. Civic education programmes can help to strengthen civic values, thus enabling citizens to reflect on their civic responsibilities and allowing them to play an active role in social and political processes. However, to be effective, these programmes should be oriented around developing skills, and be designed to increase participation by involving various stakeholders, such as CSOs with an expertise in these areas. Moreover, it is necessary to facilitate citizens’ involvement through volunteering. There is still a lot to be done in this area, even though many improvements have already been introduced. One of them is the measurement of the financial value of volunteering for individual countries’ economies – introduced by statistical offices also in the CEE countries as one of the results of the European Year of Volunteering 2011 and the implementation of the European Qualifications Framework⁶.

- Remove legal barriers to civil society development

Civil society cannot develop without government support. This became very apparent during the COVID-19 pandemic, but it is just as important beyond its duration. It is crucial that governments create support mechanisms and remove legal barriers that impede on the development of CSOs, including cumbersome registration procedures and the exclusion of certain organisations from the “public benefit” status. Here, again, it is important to acknowledge the value of civil society and civic values, which goes beyond the activities of individual CSOs. An independent civil society can be an important partner for national governments, and can contribute to the socioeconomic development of a country.

⁴ See <https://citizenstakeover.eu/press-releases/citizens-take-over-europe/2020>.

⁵ See <https://civilsocietyeurope.eu/the-civil-society-convention-on-the-future-of-europe-is-ready-to-work>.

⁶ See <https://europa.eu/europass/en/european-qualifications-framework-efq>.

- Open public funds to all CSOs and design transparent application and reporting procedures

Public funds are indispensable for civil society development and should be accessible to all CSOs, irrespective of their political position. It is essential to create transparent application and reporting procedures to allow civil society to develop in a sustainable way. The procedures should be designed in a public consultation process, with the participation of a broad spectrum of CSOs representing various areas of work and ideological orientations. Furthermore, it would be beneficial to involve civil society representatives in the bodies responsible for planning and supervising the spending of public funds.

- Introduce laws to promote private donations, including tax incentives for donations

In addition to providing public support, governments should introduce laws to promote private donations. These legal changes would help CSOs to develop in ways that will benefit the society at large. However, as the example of tax incentives for CSOs in Poland shows, adopting mere legal mechanisms may not be enough. To make tax incentives really effective, they need to be combined with other support measures for CSOs focusing on individual citizens, companies as well as educational activities.

- Simplify the bureaucratic procedures for applying to EU funds

Many CSOs in Central and Eastern Europe find it difficult to access EU funds, though these funds are partly meant to strengthen their organisational capacities. Often, this is not because of EU regulations, but due to extended procedural requirements adopted by national governments. Hence, national governments should revise and simplify bureaucratic procedures related to the spending of EU structural funds (as explained above) and design them in a fair and transparent way.

- Respect the three pillars of civic space – freedom of association, freedom of assembly and freedom of expression

Tax incentives need to be combined with other support measures for CSOs focusing on individual citizens, companies as well as educational activities

The three pillars of civic space – freedom of association, freedom of assembly and freedom of expression – are fundamental values that should be respected in each EU member state. Individuals have the right to join together to express and pursue shared interests, and should not be prevented from doing so. Civil society development in the region depends greatly on the respect for fundamental freedoms, as they are essential to the functioning of a pluralistic and democratic society. National governments in Central and Eastern Europe are therefore called to respect the three pillars of civic space.

Recommendations to donors

- Continue and further develop funding initiatives for supporting civil society in the CEE region

Funding programmes are vital for civil societies in Central and Eastern Europe. It is crucial to continue existing programmes, while also designing new initiatives. In providing support, donors should strengthen the dialogue with CSOs in the region and take specific political and societal circumstances into account. Involving CSOs in co-creating and implementing funding programmes would be very beneficial. Moreover, it would be of great relevance for civil society development in the region if donors would develop support programmes for CSOs from the region to engage in a dialogue with European and international institutions (enabling them to conduct advocacy and strategic litigation activities).

- Continue and further develop the good practices of stronger transnational exchange and coalition-building among CSOs

Inter-organisational information exchange, networking and coalition-building have proved important for developing civil societies in Central and Eastern Europe. It is crucial to further develop “good practices” in this area. The Network of European Foundations (NEF), a coalition of pan-European donors, is an interesting example for a collective endeavour, supporting more than 60 CSOs from over 20 countries on an annual basis. In 2018, the network established the new “Civitates” initiative that provides funds to enable civil society actors to come together, re-vitalise public discourses and ensure that all voices from civil societies are heard. In one strand of this programme, 13 cross-sectoral coalitions were supported, all operating at the national level throughout the EU. However, this is just a drop in the ocean, as many more initiatives of this kind are needed.

Recommendations to European Union institutions

- Make application procedures for EU funds easier and more transparent

EU funds are vital instruments for strengthening civil societies in Central and Eastern Europe. It is therefore important to make access to such funds easier and more transparent, and to design application procedures which are equal and fair for all CSOs in the region. Currently, only large CSOs have the organisational capacities to cope with the cumbersome application procedures – a situation which creates inequalities in the region. Working with regional operators is a suitable approach to make EU funds more accessible in Central and Eastern Europe. Drawing on experiences from implementing financial mechanisms adopted under the EEA and Norway Grants

(Active Citizens Fund) could help with drafting solutions that reach out to smaller CSOs and those operating outside larger cities. In designing EU funding programmes, it is important to consider the amount of funding provided and the funding procedures.

Financial support should be envisaged for the new instruments proposed by the European Commission

- Design EU funds to strengthen coalition-building within civil society in Central and Eastern Europe

EU funds can be used to strengthen coalition-building within civil societies in the region. This would enable smaller CSOs to obtain funding through civil society coalitions. Experiences from the implementation of other pan-European funding schemes should be studied, such as the aforementioned Active Citizens Fund financed by EEA countries and Norway.

- Maintain the support to CSOs working on the rule of law in the new Multiannual Financial Framework (especially by appropriate implementation of the CERV Programme)

In the CEE region, human rights CSOs and those working on the rule of law are most vulnerable to marginalisation and political repression. At the same time, the role of independent CSOs protecting human rights and the rule of law has never been more important. These organisations support the values which are enshrined in Article 2 of the Treaty on European Union and deserve to be protected. In the debate on the rule of law compliance, the functions of civic actors in the defence of the rule of law should be emphasised much stronger⁷. However, the recognition of their role enshrined in Art. 3 of the Regulation (EU) 2021/692 of 28 April 2021 establishing the Citizens, Equality, Rights and Values Programme should be appreciated⁸. This is a good direction to respond, *inter alia*, to the need of the CSOs for financial support to engage in the EU’s rule of law monitoring procedures. The same should be envisaged for other new instruments proposed by the European Commission: the Europe-

⁷ See <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1602583951529&uri=CELEX%3A52020DC0580>.

⁸ See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL%3A2021%3A156%3ATOC>.

an Democracy Action Plan⁹ and the Digital Services Act package¹⁰. Furthermore, to protect the rule of law in Central and Eastern Europe, the EU should more actively involve civil society actors in reporting and discussion, in order to gain a more precise picture of the developments in the region. Finally, EU structural funds implemented through governments should be tied to broader and more general standards, in order to effectively protect civil society in the region.

It is vital that the EU funding to CSOs working on EU values in the framework of the CERV Programme has been extended after a strong advocacy campaign of European civil society¹¹. As a result the EU Multiannual Financial Framework 2021-2027 received an additional EUR 800 million (with an overall budget of EUR 1.3-1.6 billion)¹². However, this funding has not resolved all the problems yet; certainly not in regard to the difficulties that civil society actors experience in accessing this funding. Nevertheless, we warmly welcome that the programme regulations envisage more favourable and flexible conditions for spending by diverse organisations, including smaller CSOs. Moreover, a model has been enabled, where regional programme operators (i.e. CSOs) could be involved in the distribution of funding in a form of the indirect programme management (see Art. 9.1 of the Regulation (EU) 2021/692). However, what we need now is the relevant calls for proposals to be launched as soon as possible, with this funding model included. This will allow for financial support to reach a much

wider range of diverse CSOs operating in EU member states, especially where the situation keeps deteriorating.

Conclusion

The space for civil societies in Central and Eastern Europe has been shrinking since 2013, as the political climate has become more antagonistic. The most important challenges for civil societies comprise legal and regulatory restrictions, a decrease of funding opportunities, as well as the difficulties that CSOs face in connecting with their constituencies and creating public support. However, CSOs in the region have not only experienced restrictions, but have also produced many innovations, including new approaches to communication and fundraising, as well as attempts to increase credibility and transparency. Some of the most interesting examples of organisational responses and policy recommendations for strengthening civil society in the region are collected in these policy recommendations which aim to contribute to the debate on civil society development in Central and Eastern Europe. The EU-Russia Civil Society Forum can strengthen civil societies in the CEE region by facilitating an exchange of experiences and information regarding challenges and organisational solutions, and by supporting CSOs to form viable (transnational and national) advocacy coalitions to protect and develop civil societies in Central and Eastern Europe.

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- 9** For more information on the initiative, see <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12506-European-Democracy-Action-Plan>.
- 10** For more information on the initiative, see <https://ec.europa.eu/digital-single-market/en/digital-services-act-package>.
- 11** This activity was initiated as a cooperation of national operators of the Active Citizens Fund and is also a good example for a transnational exchange and collective advocacy efforts that can serve as an inspiration for others. See the full statement with the recommendations by this group at the Environmental Partnership Association website: www.environmentalpartnership.org/environmentalpartnership.org/files/1b/1b50169a-6efd-4d1f-9897-2f33b0b99532.pdf.
- 12** See the “EU’s Next Long-Term Budget and NextGenerationEU: Key Facts and Figures” at https://ec.europa.eu/info/sites/info/files/about_the_european_commission/eu_budget/mff_factsheet_agreement_en_11.11_v8.pdf - and the European Commission Implementing Decision from 19 April 2021 on the financing of the Citizens, Equality, Rights and Values Programme and the adoption of the multiannual work programme for 2021-2022 at https://ec.europa.eu/info/sites/default/files/1_en_annexe_acte_autonome_part1_v8.pdf.

Authors

Ulla Pape (Berlin, Germany), Freie Universität Berlin
ulla.pape@fu-berlin.de

Filip Pazderski (Warsaw, Poland), Institute of Public Affairs
filip.pazderski@isp.org.pl

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