



Contribution of WWF Greece to the [Call for Evidence](#) process
for an Initiative on EU civil society strategy
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Athens, September 5th, 2025

WWF Greece welcomes the EC's Initiative under the title "EU civil society strategy" and hereby submits its contribution aiming at providing valuable input on the challenges CSOs face in Greece and the EU, and sharing an ambitious initiative endorsed by a wide range of CSOs to promote effective public participation in environmental decision making processes in Greece.

The existing regulatory framework and the current state of play

[Article 15](#) of the Treaty on the Functioning of the European Union recognises civil society's role in the good governance of the European Union (EU). [Article 11](#) of the Treaty on European Union stresses the need for the EU to have an open, transparent and regular dialogue with civil society organisations, for example when preparing proposals for EU laws. ¹

The Council of Europe is also working on the protection and promotion of civil society space, as it deems civil society actors and organisations as "a vital force in modern democracies", while particularly highlighting their watchdog role. ²

The [UN Guidance Note on Protection and Promotion of Civic Space](#), which provides us with the meaning of the term, defines civic space as "the environment that enables people and groups – or 'civic space actors' – to participate meaningfully in the political, economic, social and cultural life in their societies". Stressing the importance of the word "meaningfully", one could note that despite the plethora of policies and legislation providing the necessary space for the involvement of CSOs in law- and policy-making, most of the time we notice a merely procedural interference without their substantive participation.

Civil society plays a pivotal role in advancing civil, political, economic, social, cultural, and environmental rights. It empowers marginalised voices, promotes active participation in

¹ <https://eur-lex.europa.eu/EN/legal-content/glossary/civil-society-organisation.html>

² <https://rm.coe.int/guidance-note-on-civil-society-participation-in-the-intergovernmental-/1680b462f7>

governance, and holds authorities accountable.³ Often CSOs act on safeguarding the rule of law, highlighting serious societal issues and exerting pressure to policymakers, thus shaping legislation.

Civil society participation is a crucial component of European democracy, both as a prerequisite for the legitimacy of EU policies, and as a tool to ensure policies and laws drawn up at European level respond to the reality and needs of people impacted by these policies. Structured civil dialogue is distinct from other forms of participation. As recognised by the Council of Europe guidelines on civic participation in political decision-making, civil participation in decision-making can take different forms, including provision of information, consultation, dialogue and active involvement.⁴

Since 2022, the EP has warned about the “*degradation of civic space throughout the EU with policies hampering CSOs’ operations, their access to sustainable funding and their ability to participate in decision-making; condemns any form of harassment, smearing, stigmatisation, criminalisation and scapegoating of CSOs; stresses how these actions jeopardise active citizenship and the expression of critical voices, thereby undermining public debate and hence the very foundations of democracy*”, highlighting that “*when civil society’s space to operate shrinks, it is a sign that the rule of law is at risk*”.⁵

In the past few years, and notably since the last EU elections, we have noticed the creation of a hostile environment towards CSOs, even inside the auspices of the EU [<https://eeb.org/wp-content/uploads/2025/04/NGO-Funding-Statement-Designed.pdf>]. During the summer, a plethora of media reported the creation of an official body to probe NGO funding: <https://www.politico.eu/article/eu-parliament-creates-official-body-to-probe-ngo-funding/>. It is very concerning for such statements to exist, and bold action is needed by all stakeholders to ensure the functioning of civil society without obstacles.

Key elements of strong public participation

Building on its Recommendation (EU) 2023/2836, the aim now is to create a comprehensive framework to strengthen meaningful engagement and provide support to all civil society actors, a proposal that we strongly welcome. This initiative must contribute toward recognising civil society organisations (CSOs) not just as implementers of EU policies, but as essential democratic actors in their own right. A robust, coherent, and well-resourced Civil Society Strategy is urgently needed to reverse this trend and empower civil society to continue its indispensable work. The Strategy must ensure that all EU policies actively support civic space. This includes conducting systematic civic space impact assessments across legislative and regulatory proposals, to prevent unintended restrictions on civil society. It should also establish a comprehensive EU protection

³ <https://civilsocietyeurope.eu/open-letter-ensuring-a-vibrant-civic-space-in-the-european-union-civil-societys-expectations-for-the-next-five-years/v>

⁴ <https://civilsocietyeurope.eu/wp-content/uploads/2025/01/EU-Civil-Dialogue-the-foundations-of-an-institutional-framework.pdf>

⁵ https://www.europarl.europa.eu/doceo/document/A-9-2022-0032_EN.html

system for Human Rights and Environmental Defenders and CSOs, capable of providing timely legal, financial, psychosocial, and digital support. Such a system must be independent, sustainable, and grounded in human rights standards, with rapid response capacity and mechanisms for long-term reform. Financial support is another cornerstone. The next Multiannual Financial Framework must include strong, structural support for civil society, including a stand-alone, directly managed programme dedicated to strengthening civic space, accessible for all CSOs across sectors. Operating Grants should be increased, made more accessible, and explicitly include advocacy as a legitimate activity. Simplified procedures are essential, and the LIFE Programme must be maintained and reinforced as a key instrument supporting environmental CSOs. To ensure meaningful participation, the EU should adopt a binding Interinstitutional Agreement on Civil Dialogue between the Commission, Parliament, and Council. This would establish regular, structured engagement with civil society across all stages of the policy cycle. The upcoming Civil Society Platform should be designed as a permanent mechanism for systematic, cross-cutting dialogue, embedded within a broader framework for civil dialogue. It must include diverse voices and support civil society's role in shaping the EU's political agenda.

At national level, Member States should be encouraged to develop formal, transparent, and inclusive frameworks for civil society engagement. The Commission should also issue recommendations to support enabling environments for CSOs across the EU. Removing barriers to cross-border cooperation is equally important. Civil society organisations and foundations must be guaranteed freedom of establishment and movement within the single market.

In this vein, it is also important for the EC, in the framework of this new strategy, to focus on the enhancement of certain processes that are already in place so as to facilitate civil society's role, such as proper implementation of the right to access to justice; it is common for organizations' complaints to be closed due to a lack of a "strategic violation" of EU law, significantly limiting their ability to protect important environmental goods.

The challenges CSOs face in Greece

Specifically in Greece, CSOs face multiple hurdles when participating in decision-making processes, esp. with respect to environmental matters. Extremely short public consultations mostly during holiday periods leave no room for meaningful public participation in designed policies, no prior information of the public or education on participation matters do not allow citizens to provide their valuable feedback, usually on very complex and technical documents that are difficult to navigate. Local citizens groups often complain that their rights, even though seriously at stake, are not taken into account, fragmented methods of participation (many different platforms that are widely unknown) and no real consideration of the comments received are only some of the examples that endorse our view on a severely undermined framework of civil society's role. Additionally, citizens are able to comment on the relevant platforms through a designated account that can be accessed with the passwords linked to their tax registration numbers, meaning that certain groups of people are excluded from participating (e.g. displaced persons) and, of course, not everyone has access to the internet or can easily use it. Another serious impediment to meaningful public participation and a serious blow to transparency is the fact that the material placed in public consultation, particularly EIAs and the required studies for the

conservation of Natura 2000 areas, simply disappears when consultations end, while no reporting of the results of the consultation is published (except in a few flagship cases).

Extremely important climate policies and legislation have not been actively communicated to the public for its participation, with a wide range of CSOs trying to fill the gaps of educating and raising citizens' awareness so as to receive their feedback on matters that affect them directly. Public consultations on key climate policies, such as the National Energy and Climate Plan, the Social Climate Plan and sectoral carbon budgets have followed the same pattern. In the last case, the CSO's participation was almost inexistant. Moreover, there is no mechanism for the Multi-level Energy and Climate Dialogues has been set up as provided by the Governance Regulation, thus hindering effective information and participation of CSOs in pressing topics of climate policies. With respect to the law-making process, frequently amendments on bills that are under the voting process appear before the Parliament after the completion of the public consultation process, thus excluding these amendments from public scrutiny. Practices like these undermine the essence of democracy and the rule of law.

What is more, recently 79 Greek CSOs addressed a letter to the Prime Minister on the need to cultivate a culture of respect and cooperation with Civil Society, after certain public statements by government officials disparaging the work and transparency of CSOs and undermining the role of volunteerism [see here: <https://actionaid.gr/ta-nea-mas/koini-epistoli-organoseon-kai-diktion-se-prothypoyrgo> (in Greek)].

A civil society initiative for the enhancement of public participation in Greece

Having to face such challenging situations, civil society's action has to be innovative and ambitious. A wide range of environmental and human rights CSOs, including the Greek General Confederation of Labour, have drafted and communicated in 2024 to the Members of the Hellenic Parliament a legislative proposal on strengthening and expanding public participation in environmental issues [find the full text in Greek here: https://wwfeu.awsassets.panda.org/downloads/nomothetiki_protasi_dimosia_simetoxi_post_consultation.pdf]. The aim was to substantially improve all procedures for public participation in decisions and procedures concerning critical environmental issues, after conducting an open consultation process for a two-month period and, once it was completed, the comments received were processed and incorporated in the final proposal. The text as it was communicated was then submitted as a draft law proposal to the Hellenic Parliament by an opposition party [see here: https://www.hellenicparliament.gr/Nomothetiko-Ergo/Anazitisi-Nomothetikou-Ergou?law_id=28025602-1cea-4e2b-9722-b20900eefc44].

More specifically, the prerequisites for effective public participation that constitute our main asks foreseen in the above-mentioned proposal are:

1. The creation of a single open-access website where all procedures for public participation in environmental decision-making will be carried out.
2. The establishment of safeguards for the effective exercise of participation rights (e.g. discouraging abusive prosecutions).

3. Strengthening participation by requiring timely notification of upcoming consultations, extending public consultations to new acts (e.g. legislative acts, amendments, draft laws, and proposals for constitutional revision, etc.), and conducting exploratory consultations as a first step before the final consultation, when all possibilities and policy options are still open.
4. Strengthening the role of local communities with local referendums, the result of which will bind local administration in examining and bringing for decision in the respective local or regional council.
5. The establishment of a new procedure for "citizens' initiative" with a request to the competent administrative authorities to issue a regulatory act provided for in an enabling provision of law.
6. Strengthening the ability of every citizen to submit a request for an investigation into any incident that they believe has a negative impact on the environment.

Meaningful public participation and a strong civil society are necessary prerequisites for democracy itself; the effective implementation of political decisions needs societal acceptance, especially in the face of the climate crisis and the transition to a climate-neutral future.

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