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Answer given by Ms Roswall
on behalf of the European Commission
(13.3.2025)

The EU programme for the environment and climate action (LIFE)¹ provides amongst others financial support for the functioning of non-governmental organisations (NGOs) supporting civil society's participation in policy making, promoting a pluralistic approach and recognising that NGOs are an integral part of a well-functioning democratic system.

Each year 30 to 35 operating grant agreements are awarded under the LIFE Programme, following a call for proposals and a competitive procedure. NGOs applying submit proposals that include their work programme of activities in the policy areas indicated in the LIFE Regulation². The NGOs work programmes, which are annexed to their grant agreements, may mention among other activities, advocacy related to environmental, climate and energy transition policies. 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 specific positions. The Commission emphasises that operating grants are complying with the LIFE Regulation adopted by the co-legislators and their management is fully in line with the EU Financial Regulation³.

The Commission agrees that funding agreements involving specifically detailed activities directed at EU institutions and some of their representatives, even if they do not breach the legal framework, may entail a reputational risk for the EU. To mitigate this risk, guidance⁴ for both existing grant agreements and future calls has been issued, addressed to all Commission services and applicable to all spending programmes. The guidance clarifies which activities should not be mandated as a requirement or condition for EU financing.

The Commission adheres strictly to its impartiality and transparency obligations as outlined in Article 38 of the Financial Regulation, which requires publishing information about recipients and does not require the disclosure, of advocacy activities funded through grant agreements. The Commission also promotes transparency by proactively sharing the objectives and outcomes of funded projects on the EU Funding & Tenders Portal⁵. The NGOs benefiting from LIFE support and the grant amount received are published annually in the Commission's Financial Transparency System webpage⁶ as well as on the LIFE website⁷. Furthermore,

¹ https://cinea.ec.europa.eu/programmes/life_en

² Regulation (EU) 2021/783 of the European Parliament and of the Council of 29 April 2021 establishing a Programme for the Environment and Climate Action (LIFE), and repealing Regulation (EU) No 1293/2013, OJ L 172, 17.5.2021, p. 53–78.

³ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast), OJ L, 2024/2509, 26.9.2024.

⁴ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/guidance-funding-dev-impl-monit-enforce-of-eu-law_en.pdf

⁵ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/home>

⁶ <https://ec.europa.eu/budget/financial-transparency-system/index.html>

⁷ https://cinea.ec.europa.eu/programmes/life/life-operating-grants_en

interest representatives are required to report their lobbying activities and disclose key funding sources, including any contributions exceeding EUR 10 000 or representing more than 10% of their total budget, in the Transparency Register⁸.

⁸ Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register, OJ L 207, 11.6.2021, p. 1–17.