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The circle of LIFE: Manufactured attacks on civil society or genuine transparency concerns? Political contestation of NGO funding in the European Union

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Abstract

In January 2025, the European Parliament (EP) debated the transparency and accountability of EU-funded non-governmental organisations (NGOs), with a particular focus on environmental NGOs receiving operating grants from the LIFE programme. This was the result of sustained political contestation from centre-right and right-wing political groups, who characterised LIFE beneficiaries as “shadow lobbyists” advancing the European Green Deal on behalf of the European Commission. Despite a European Court of Auditors (ECA) Special Report finding that the transparency requirements had been met, the EP established a Scrutiny Working Group (SWG) to inspect LIFE and the Commission’s Multiannual Financial Framework (MFF) proposal for 2028-2034 to absorb the programme into the European Competitiveness Fund (ECF).

This thesis asks: What explains the shift from permissive consensus to sustained political contestation of LIFE operating grants between 2022 and early 2026? Using process-tracing methodology, two hypotheses are tested to determine whether the contestation was accountability-driven with genuine transparency concerns (H1) or a politically driven strategy targeting the advocacy capacity of environmental civil society organisations (CSOs). The analysis starts with a reconstruction of the causal sequence of events revolving around LIFE within the specified timeframe, followed by the application of the straw-in-the-wind, hoop, and smoking-gun tests to the available evidence, as developed by Collier (2011) and operationalised by Ricks & Liu (2018). The main corpus of evidence comprises the verbatim record of the January 2025 plenary debate, the ECA’s Special Report 11/2025, and four interviews with experts and relevant stakeholders.

The findings support H2. The ECA audit did not identify compliance failures in grant management; the political mobilisation against LIFE-funded environmental NGOs preceded the audit, and the contestation intensified after the ECA confirmed that the transparency requirements had been followed. The specific targeting of one beneficiary type correlated with policy alignment rather than with compliance or reputational risks. The plenary debate reveals this, as analysed through framing theory (Entman, 1993): the statements steered towards the desirability of EU-funded advocacy, while proposing the dissolution of LIFE as a standalone programme rather than addressing management deficiencies. Moreover, Buyse’s (2018) civic-space framework is applied to the EU institutional context, identifying resource restrictions, stigmatisation, and structural pressure through legitimate channels (such as the MFF) rather than explicit prohibitions.

This thesis contributes to two accounts. On the one hand, it extends the shrinking civic space literature by treating the EU as a site of contestation rather than merely an external defender of civil society. It demonstrates that civic-space restrictions at the supranational level can operate without formal democratic backsliding. On the other hand, it contributes to the politicisation literature by documenting how, seemingly, depoliticised governance instruments like LIFE become contested when political pressure attributes them to the Green Deal's backlash.

The case study is temporally limited as the Scrutiny Working Group and the MFF negotiations are ongoing at the time of writing, and the explaining-outcome variant of process tracing generates a minimally sufficient causal account for LIFE that should not be generalised to other EU funding instruments.

Dedicatory Note

This work means the culmination of my academic studies, at least for a while. Moreover, that does not mean learning stops, yet I am grateful for all the years I have spent discovering the world bit by bit.

To my mother, the strongest person I know. The admiration I have for you is incommensurable, and I am so proud to be called your daughter. To my sister, to whom I hope to inspire for a better life in any way her heart desires. To my grandmother, who I know is proud of how far I have come, may you always hold my hand as I go forward.

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Keywords

NGO Funding

Environmental Protection and Climate Action

Scrutiny Working Group

Democratic Health and Governance

Transparency

Multiannual Financial Framework

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Figure 3. Causal sequence graph. Mechanism (in blue) is how X produces Y. Evidence (white) is what observations bear on each step. Source: own elaboration. 39

List of Abbreviations

CDU	Christian Democratic Union
CINEA	Climate, Infrastructure and Environment Executive Agency
CSO	Civil society organisations
ECA	European Court of Auditors
ECJ	European Court of Justice
ECR	European Conservatives and Reformists
ENGOS	Environmental non-governmental organisations
EP	European Parliament
EPP	European People's Party
FPA	Framework Partnership Agreement
FRA	EU's Fundamental Rights Agency
FTPO	Funding and Tenders Portal
FTS	Financial Transparency System
GAL	Green, Alternative, Libertarian
MEP	Member of the European Parliament
MFF	Multiannual Financial Framework
PfE	Patriots for Europe
S&D	Socialists and Democrats party
SWG	Scrutiny Working Group
TAN	Traditional, Authoritarian, Nationalist

1 Introduction

In May 2024, the European Commission issued a guidance note prohibiting LIFE operating grant (OG) agreements from requiring beneficiaries to undertake “specifically detailed activities directed at EU institutions.” (European Commission, 2024) Eight months later, the European Parliament held a plenary discussion during which one of its longest-running funding programmes was characterised as a vehicle for ‘shadow lobbying’. Five weeks after that debate, the European Court of Auditors published Special Report 11/2025, which examined transparency in EU funding to NGOs and found no evidence of wrongdoing in the cases under scrutiny. This sequence of events raises the question of whether the rationale could be adequately explained as a transparency concern or as something else.

1.1 *The LIFE programme under scrutiny*

The LIFE programme (*L’Instrument Financier pour l’Environnement*) is the EU’s funding mechanism for environmental governance since 1992. In the current (2021-2027) Multiannual Financial Framework (MFF), LIFE held a budget of €5.4 billion. However, its place in the next MFF has been proposed as joining the European Competitiveness Fund (ECF), along with 13 other programmes.¹ Ultimately, the decision to scratch it as a standalone fund could potentially undermine its effectiveness and survival. Nevertheless, what has prompted this change?

Since 2022, the European Union has faced many challenges regarding funding and corruption through civil society organisations (CSOs). At the crossroads, LIFE has become the subject of intense scrutiny over transparency concerns from major right- and far-right political groups, which claim the fund's beneficiaries have “lobbied” the Commission. This has broader implications than a mere political debate and is more akin to an analytical case that is significant for understanding the conditions under which participatory infrastructure in EU governance can become contested.

1.2 *Relevance: Transparency concerns or broader tensions?*

There is empirical and normative evidence for why the LIFE case warrants exploration. Empirically, LIFE’s trajectory has direct consequences for the 2028-2034 MFF. Scholarly, the civic space literature to be touched upon treats the EU as a defender of civic

¹ Including Horizon Europe, InvestEU, and Digital Europe (Zabala, 2026)

space beyond its borders, rather than as a site of internal contestation. Normatively, LIFE is significant because if the transparency framing can operate as a restriction instrument, this case reveals a mechanism of democratic erosion operating through legally established, institutional channels.

For critics, EU-funded NGOs raise concerns about the neutrality of the institutions, transparency, and the possibility that public money is used to influence policymaking. For supporters, NGOs are an established component of the policymaking ecosystem, contributing with expertise, representing societal interests, and balancing the influence of well-resourced corporate lobbying actors.

1.3 Research questions

The core research question that guides this thesis asks: “What explains the shift from permissive consensus to sustained political contestation of the LIFE programme’s operating grants between 2022 and early 2026: an accountability-driven governance correction or a politically-driven strategy of stigmatising environmental civil society?”

This question is operational through the following three sub-questions: (1) “what was the causal sequence of events, actors, and institutional decisions through which LIFE moved from a depoliticized consensus to an object of sustained contestation between 2022 and Q1 2026?” (2) “Through what specific frames did key political actors redefine LIFE-funded environmental NGOs and what evidence did they cite (or fail to do so) to support those claims?” (3) “What observable effects did the politicization and stigmatisation of LIFE have on the operating environment of EU-funded environmental NGOs, in terms of funding conditions, advocacy restrictions, institutional access, and reputational positioning, and what does this reveal about the health of participatory democracy in the EU?”

This research tests two explanations for the shift from permissive consensus to sustained contestation. H1 holds that the contestation was an accountability-driven governance correction responding to compliance gaps in LIFE’s operating grants. H2 holds that it was a politically driven campaign targeting the advocacy capacity of environmental civil society, weaponising transparency as a legitimising frame (through stigmatisation). The full statement of hypotheses and their observable predictions are set out in the Research Design chapter. The originality of this thesis lies in the scope, the theoretical application, and the case study selection.

1.4 Structure of the research

The following chapter will account for the scholarly literature on the adjacent themes. Consequently, the theoretical framework establishes civic space as the analytical anchor, politicisation as the context, and framing as the method. The methodology is justified, and the process tracing is explained. Chapter 5 overviews the LIFE programme, specifying operating vs project grants, and constructs a causal sequence of events. Chapter 6 analyses the EU's disclosure architecture, which has enabled contestation and delivers the tension between de jure and de facto fragmentation. Chapter 7 conducts the process tracing tests methodology: Collier's four tests adjudicate between H1 and H2, weighing the available evidence. Chapter 9 examines the institutional consequences in the future, applying Buyse's four indicators. Finally, the conclusion ponders the hypotheses and situates the findings in the overarching research.

2 Literature Review

2.1 *EU-funded civil society and the governance rationale*

The relationship between the EU and civil society organisations (CSOs) is driven by a strategic governance rationale aimed at bridging the Union's "democratic deficit" (Kohler-Koch & Quittkat, 2013). In this relationship, Persson & Edholm (2017, p. 559) note that the European Commission involves stakeholders because elections are often seen as inadequate for voicing public opinion at the EU level. As a result, CSOs are expected to serve as a "transmission belt" between citizens and decision-makers. (Steffek et al., 2008, p. 4). Dür & de Bièvre (2007) observe that this outreach to civil society is also functional: the Commission is understaffed and lacks procedural legitimacy. Furthermore, Mahoney & Beckstrand (2011) argue that this patronage is a deliberate attempt to foster a pan-European civil society and a "European public opinion," which are considered as prerequisites for a true political identity.

A central theme in the literature is the tension between the access granted by EU funding and the resource dependency it creates. For example, diffuse interests, such as consumer interests or environmental matters, face significant collective action barriers, unlike specific business interests, which mobilise more easily (Dür & de Bièvre, 2007, p. 6). Furthermore, Mahoney & Beckstrand (2011, p. 1348) found that the Commission seeks to balance this by funding diffuse interests and EU-level groups preferentially. Receiving funding significantly increases the likelihood that a CSO will gain access to formal channels of participation, such as expert groups and committees (Persson & Edholm, 2017).

On the other hand, access to said formal channels of participation comes at a cost. Bloodgood and Tremblay-Boire (2017) find that a higher share of government funding in an NGO's budget is generally negatively associated with lobbying expenditures, thereby creating a "dampening effect" on political activity. Moreover, they identify a "government threat" in which donors may implicitly discipline NGOs if they become too radical; however, they note that EU funding is unique and often acts as an enabling resource because the EU lacks the capacity to implement policy without CSO support (Bloodgood & Tremblay-Boire, 2017, p. 420)

2.2 *How do depoliticised issues become contested?*

The study of EU politicisation marks a shift from a “permissive consensus” to a “constraining dissensus” involving mass politics and public contestation (Hooghe & Marks, 2009; Zurn, 2014). This process is defined as the growing salience of debates, the polarisation of opinion, and the expansion of the number of actors involved in EU affairs.

The primary social cleavage identified in politicisation literature is the cosmopolitan-communitarian axis. For cosmopolitanism, Zurn (2014, p. 61) argues that a “skills revolution” and cognitive mobilisation have created a class of citizens with universalistic values who use international and EU institutions to achieve policy goals. This axis is aligned with the Green-Alternative-Libertarian (GAL) attitudes, which view European integration as a multicultural, emancipatory project (Hooghe & Marks, 1999, pp. 843- 844). For communitarianism, Hooghe & Marks argue that the attitudes relate more to the Traditional-Authoritarian-Nationalist (TAN) dimension, which emphasises national identity and boundaries. Zurn (2014, p. 66) observes that while cosmopolitans effectively use the supranational level for agenda-setting, communitarians are often restricted to national scenarios, increasing the distance between elites and the mass public.

Other relevant ideas in the existing literature are outside-in politicisation, horizontal diffusion and systemic politicisation. Hackenesch et al. (2021, p. 12) introduce the concept of outside-in politicisation, defined as the contestation of EU policies within third countries, such as partner countries in the Middle East or Latin America. Subsequently, this triggers political debates within the EU regarding the legitimacy of its external actions. Furthermore, politicisation can diffuse horizontally across policy fields, as when migration crises trigger the politicisation of development aid (Hackenesch et al., 2021, p. 4). Finally, Beaudonnet & Gomez (2024, p. 2) characterise politicisation as a “one-way street” that primarily benefits Eurosceptic parties by bringing certain EU issues into the spotlight to gain social acceptability and “issue opposition.”

While a priori, politicisation can be a catalyst for change, Bornemann et al. (2025) identified mechanisms through which it undermines transformation. It can “stall” it through counter-mobilisation by vested interests (farmers’ protests, for instance) or “sever” it when a gap grows between elites and a public that feels marginalised by technocratic steering. Ultimately, this leads to a “simulated transformation” in which stakeholder dialogues create

an illusion of progress without producing substantive policy change (Bornemann et al., 2025, p. 9).

2.3 A shrinking civic space in the European Union?

The phenomenon of shrinking civic space, the structural squeezing of “the layer between state, business and family in which citizens organise, debate and act,” has moved from a series of isolated incidents to a dominant global trend (Buyse, 2018, p. 967). While traditional literature has long framed the EU as a primary defender of these spaces against authoritarianism, recent developments suggest a critical turn in EU governance. In this shift, the Union’s own governance logic increasingly mirrors the restrictive measures used by the very regimes it once sought to reform.

According to Buyse (2018), civic space is operationalised by the extent to which organisations can enjoy the freedoms of association, assembly and expression. However, CSOs across the EU are facing growing pressure which undermines their ability to safeguard fundamental rights and contribute meaningfully to democratic life” (EU Agency for Fundamental Rights, 2024). This pushback is characterised as the “new normal”, where governments move beyond temporary setbacks to enforce permanent legal and logistical barriers to civil society (Carothers & Brechenmacher, 2014, p. 31).

A crucial distinction in this process is between violent and administrative crackdowns. While violence is typically used for immediate domestic threats (e.g., protests), states increasingly prefer administrative crackdowns, or the use of legal restrictions on entry, advocacy and foreign funding (Chaudhry, 2022, p. 551). This nonviolent repression is more insidious because it is often perceived as “regulation” rather than overt repression, undermining possible backlash.

Recent literature (Alemanno, 2025; Murphy & McMahon, 2025) delineates a departure from the narrative of the EU as a defender of the civic space. Alemanno (2025) identifies a playbook that EU institutions and national governments are currently deploying. This process involves fabricating scandals (as the weaponisation of Qatargate) to delegitimise organisations², followed by defunding and criminalising the remaining support as “foreign influence.” The creation of a dedicated Scrutiny Working Group on NGO financing within the EP is cited as the height of this attack, transforming accountability tools

² The outcome of sustained stigmatisation, in Buyse’s (2018) terms.

into weapons against organisations that have played an expert role in policy development and assessment. Murphy & McMahon (2025, p. 14) argue that Qatargate served as an “unexpected intervening variable” that strengthened the claims for restrictive NGO regulation.

2.4 Environmental NGOs and the Green Deal backlash

The trajectory of environmental non-governmental organisations (ENGOS) in the EU has evolved from a period of deep institutionalisation to intense politicised backlash. Long & Lörinzi (2009) documented the emergence of the “Green 10,” a coalition of the most influential ENGOS in Brussels, which was actively fostered by the European Commission (DG ENVI) to provide a counterbalance to the asymmetries with the business lobby. This relationship transformed ENGOS into a sort of gatekeepers of environmental interests, wielding significant influence through expert groups and official hearings.

Nonetheless, Hadden & Bush (2021) argue that this sector is characterised by high concentration in both relational and economic resources. Their analysis reveals that the top 1% of environmental organisations control over 50% of the sector’s resources, exceeding other NGO sectors such as human rights or development. This concentration allows a small set of “insider” groups, such as WWF, Greenpeace and Friends of the Earth, to set the global advocacy agenda, often creating power dynamics where smaller, specialised groups must follow these giants to gain recognition for their issues.

As ENGOS become embedded in the political mainstream, they reach what Berny & Rootes (2018) describe as a “crossroads.” This tension exists between institutionalisation (lobbying from within the tent) and radicalisation (challenging the failure of mainstream politics through direct action). Their institutional path has been historically challenged.³

The contemporary landscape is defined by a shift from a “permissive consensus” to a “polarising backlash” against the EU Green Deal. Toygür & Sojka (2025) demonstrated that while individual citizens largely support climate action in principle, they have become increasingly aware of the economic trade-offs involved. This has shifted the climate conversation from an uncritical consensus to a pattern of polarisation, in which climate policy scepticism has become a primary mobilising factor for Eurosceptic parties⁴. Far-right

³ For further reference, the Global Financial Crisis (GFC) saw right-wing governments making U-turns on green issues (David Cameron’s directive to “get rid of all the green crap” in 2013).

⁴ 2024 European Parliament election results.

challenger parties have successfully framed the Green Deal as an elitist “imposition of Brussels” that harms “ordinary people and national industries” (Toygür & Sojka, 2025, p. 531). This wedge issue has been amplified by visible protests, such as the 2024 farmers’ demonstrations, which targeted the EU institutions as the primary source of their economic hardships. Consequently, European leaders have begun a cautious reduction in the visibility of green policies to avoid further mobilising the Eurosceptic electorate⁵.

Overall, the gap addressed by this thesis lies at the intersection of the politicisation of an EU funding instrument as a mechanism of civic space contestation within EU institutions themselves (specifically the LIFE programme in the 2022-2026 timeframe).

⁵ For further information, refer to the Commission’s Omnibus I (2025) on sustainability.

3 Theoretical Framework

This chapter sets out the three theoretical frameworks that will analyse the results through the following lenses: politicisation, framing theory, and the shrinking civic space.

3.1 *Politicisation theory and the contestation of EU governance*

Politicisation, in the most general terms, can be defined as “the demand for, or the act of, transporting an issue or an institution into the sphere of politics – making previously unpolitical matters political.” (Zürn, 2019, p. 977) This phenomenon has been present in the space of European integration since the 1980s, and there has been a rise in politicisation in the EU sphere since then, with euroscepticism rising exponentially across borders. For this thesis, politicisation theory, applied to the participatory infrastructure of EU governance, as exemplified by the LIFE programme, will allow for an understanding of how funding mechanisms and the civil society architecture that were once assumed to be beneath the threshold of political salience have found themselves at the centre of contestation.

Regarding European integration, Zürn describes how it initially operated under a permissive consensus, demonstrating that the publics were largely indifferent to EU technocratic decisions. With the passing of time, the authority of the EU has crept.⁶ into domestic affairs, regulating domains such as agriculture, the environment, and labour. This, in turn, has prompted a shift toward a constraining dissensus on non-traditionally salient issues. (Hooghe & Marks, 2009) Citizens and political actors alike began actively contesting EU decisions rather than passively accepting them.

In politicisation struggles, there are two opposing camps: cosmopolitans, who embrace supranational governance and transboundary problem-solving; and communitarians, who prioritise national sovereignty and democratic self-determination at the domestic level (Hooghe & Marks, 2009). For LIFE, this tension can be broken down into supranationally funded NGOs advancing environmental regulation versus nationally rooted economic actors resisting it. Therefore, politicisation theory is useful for shaping political contestation, but it does not evaluate the democratic implications or the effects of the controversy on its target.

⁶ For further reference, the competence creep phenomenon (Garben, 2017)

3.2 *Framing theory*

Taking the previous ideas into account, frame analysis is the best methodological toolkit for identifying indicators of civic space (such as stigmatisation) in the discussion. Following Entman (1993), this research examines how the involved parties (1) defined the problem of the EU funding NGO's work, (2) diagnosed the causes of the problem and assigned responsibility, (3) made moral judgments, and (4) proposed remedies and justification for treatments for the problem. The EP's plenary debate demonstrates the concept of salience in contesting the LIFE programme: "making a piece of information more noticeable, meaningful or memorable" (Entman, 1993, p. 53). This is present throughout the discussion, for instance, with the characterisation of beneficiary NGOs as lobbyists from the Commission. Entman (1993, p. 55) observes that the power of a frame can be "as great as that of language itself," which will guide the implications chapter in the discussion.

3.3 *Shrinking civic space: Stigmatisation and transparency-instrument mechanism*

The main subject of contention in this case study is civic space in the European Union; thus, it serves as the primary analytical lens for this research. Regarding its erosion, Buyse (2018) identifies the following key indicators: resource restrictions, stigmatisation, co-optation, and legal barriers. This framework, in principle, has been developed through the observation of illiberal and authoritarian contexts. This thesis examines whether these indicators, to a lesser extent, can now be identified within the EU's structural design.

Chaudhry (2022) argues that transparency and accountability framing can operate as an instrument of civic space restriction, contrary to the initial expectation of strengthening it. Notably, the author's empirical terrain is states, not supranational institutions; however, this thesis treats Chaudhry's mechanism applicable to the EU institutional context.

All in all, the theoretical framework guides this research into three streams: (1) politicization theory addresses the political conditions under which a financial instrument like LIFE moved from permissive consensus, for over thirty years, to constraining dissensus, (2) frame analysis on the EP's debate operationalizes evidence for the smoking-gun test of H2 and identifies stigmatisation, and (3) the indicators of a shrinking civic space reveal the broader implications of the political contestation over the LIFE programme.

4 Consolidated research design

The following chapter outlines this research's methodological framework. To begin with, it justifies the choice of a qualitative, interpretive case design. It explains why the political contestation of the LIFE programme between 2022 and early 2026 represents a relevant object of study. Consequently, it introduces process tracing as the main analytical methodology through which the causal sequence of contestation is reconstructed, detailing the two sources of empirical evidence utilised: publicly accessible institutional and financial documentation, as well as semi-structured interviews with pertinent stakeholders. Finally, this study acknowledges the limitations encountered.

4.1 *Approach: Case Study*

This research follows a qualitative, interpretive case study: the political contestation of the LIFE programme between 2022 and early 2026. In the same line, the research questions are as follows: how a funding instrument that had operated for over three decades under what Hooghe and Marks (2009) would describe as “permissive consensus” came to be the subject of sustained political contestation, and why this contestation emerged at this time.

As Yin (2018) defines, a case study is “an empirical inquiry that investigates a contemporary phenomenon in depth and within its real-world context, especially when the boundaries between phenomenon and context may not be clearly evident.” The political contestation of LIFE is thought-provoking because, for three decades, it was considered a successful EU environmental governance programme. Within three years, it became the subject of a Scrutiny Working Group. This study, therefore, provides leverage not only on the programme itself but also on the conditions under which depoliticised instruments of EU governance are now subject to constraining dissensus.

4.2 *Analytical methodology: Process Tracing*

To better grasp the political contestation of LIFE, this research applies process tracing to assess the relationship between the two main hypotheses in the case: accountability or political strategy. Each hypothesis generates a distinct set of observable predictions that will be tested against the primary sources listed below. The analysis follows the four-test methodology developed by Collier (2011) and operationalised by Ricks and Liu (2018). In essence, the straw-in-the-wind evidence will establish asymmetric patterns; the hoop tests

identify necessary conditions whose failure eliminates the hypothesis; the smoking-gun tests identify sufficient conditions whose presence confirms a hypothesis; and finally, the doubly decisive tests identify evidence that is both necessary and sufficient. Its application to the contestation of LIFE will be presented in the Implications chapter. Briefly, two counterfactual hypotheses (H3 as in post-Qatargate institutional correction and H4 for Green Deal backlash and MFF pressure) are analysed in the last subsection. Under Bayesian framing, the tests wield probabilistic verdicts balanced by the prior likelihood of each piece of evidence under each hypothesis (Fairfield & Chairman, 2017).

Process tracing is not applied symmetrically to both hypotheses. The selection of the test type for each hypothesis follows from the logical structure of the hypothesis itself rather than an arbitrary methodological choice. H1 implies a necessary condition: compliance failures must be observable and prior to the contestation. This condition makes it appropriate to use hoop tests, whose failure eliminates the hypothesis in its strong form (Collier, 2011, p. 826). H2 does not imply a specific necessary condition, as a political strategy can operate through diverse channels, and the absence of evidence does not falsify it in this case. Therefore, H2 is better suited to smoking-gun tests, whose presence is sufficient to confirm the hypothesis even where it is not necessary. Straw-in-the-wind tests are applied uniformly because they reveal asymmetric patterns without implications for the hypotheses. The doubly-decisive test is not applied as such evidence is rare in social-scientific process tracing (Ricks & Liu, 2018, p. 844).

4.2.1 Framing analysis: operationalising the smoking-gun test

To better understand how LIFE was politicised, it is imperative to conduct a framing analysis. This will allow the reconstruction of positions across the political spectrum regarding the scrutiny of EU-funded ENGOs, providing content for discussing Buyse's stigmatisation indicator and crucial evidence for the smoking-gun test in H2. The coding operationalises the framing theory framework developed by Entman (1993). As stated in chapter 3.2, the coding will be divided into problem definitions, cause identification, moral judgement, and the proposal of remedies.

4.3 Sources

The analysis requires a comprehensive review of carefully selected sources, chosen for their relevance, representativity, and impartiality, to document the contestation.

At the core, the following institutional documentation is instrumental in the analysis of LIFE: the verbatim report of the January 2025 EP debate; the May 2024 Commission Guidance on funding for activities related to the development, implementation, monitoring and enforcement of Union legislation and policy; the ECA's Special Report 11/2025 on Transparency of EU funding granted to NGOs; LIFE's 2025-2027 Multiannual Work Programme and the respective Calls for Proposals; and the Commission's proposal for the 2028-2034 Multiannual Financial Framework.

Similarly, four semi-structured interviews have been conducted to complement the analysis of the aforementioned documents. The following individuals have provided their insights into this work: a EU Advocacy Officer at an environmental NGO active at the EU level (March 20th, 2026), a Director at an environmental NGO active at the EU level (April 8th, 2026), Christian Beck, Accredited Parliamentary Assistant for MEP Daniel Freund (March 23rd, 2026), and a European Parliament-funded conservative political foundation (April 29th, 2026).

The CINEA beneficiary database, the LIFE dashboard, the Funding and Tenders Portal (FTPO), and the Financial Transparency System (FTS) records have been consulted to assess the transparency gap and understand the EU's disclosure architecture.

4.4 Limitations

The first limitation concerns access to official LIFE operating grant agreements, which were not publicly accessible through any of the disclosure systems at the time of writing. This shortcoming is significant because the contractual evidence was raised in the January 2025 debate in the EP. This documentation was reportedly obtained through whistleblowers,⁷ rather than the official channels.

The second limitation concerns the interview sample. 22 interview requests were issued to a diverse set of respondents to ensure a comprehensive understanding of the topic's stances. Among them are MEPs from different political groups who have been vocal on LIFE (both in favour and against the allegations), Commission and CINEA officials, environmental NGO representatives, and critical voices from think tanks, foundations, and media outlets. However, only four responded favourably; thus, the resulting sample over-represents the NGO (politically driven contestation) perspective and a single political

⁷ MEP Monika Hohlmeier reported concerns stemming from the obtention of these documents (European Parliament, 2025)

foundation funded by the EP, effectively underrepresenting the Commission's point of view and the remaining political parties. As compensation, the analysis relies on a balanced account encompassing parliamentary interventions, press releases, and public statements issued by those actors.

The third limitation is temporal. This is a current case, as the Scrutiny Working Group is still ongoing and the 2028-2034 MFF negotiations have not concluded. Thus, the research stops at an interim endpoint and cannot claim to capture the full-circle trajectory of the contestation. The focus, therefore, is on the discursive and institutional shift that has already occurred, rather than the legislative outcome.

The fourth limitation is the inter-coder reliability. As an ex-ante strategy to reduce bias, Entman (1993) prespecifies the coding scheme. Other mitigations include triangulation with interview data and presentation of counter-frames in full.

The fifth and final limitation is inherent to process tracing. The explanatory account developed here is minimally sufficient for the case at hand and is not intended to support generalisation to other instances of EU funding contestation. However, the findings inform comparative work on the political contestation of civil society space and funding in other contexts.

5 That's LIFE: a pillar in EU civil society and its problematization

This chapter establishes the historical foundations of the LIFE programme and its current structure and function. This overview reveals that LIFE's design, far from being accidental vulnerabilities, is a functional necessity that became a political liability as the broader political context shifted away from the European Green Deal. The sections covered are: origins and rationale; evolution and funding phases; operating vs specific project funding; and key beneficiaries and their governance roles.

5.1 *Origins and rationale/legal basis behind LIFE*

Article 191 TFEU: "Union policy on the environment shall contribute to the pursuit of the following objectives: preserving, protecting and improving the quality of the environment; protecting human health; prudent and rational utilisation of natural resources; promoting measures at the international level to deal with regional or worldwide environmental problems, and in particular combating climate change."

Article 11 of the Treaty of the EU (TEU) clearly states that "the institutions shall, by appropriate means, allow citizens and representative associations to make known and publicly exchange their views in all areas of Union action. EU institutions maintain an open, transparent and regular dialogue with civil society and representative associations."

The Treaty on the Functioning of the European Union (TFEU), in Article 11, states that "the institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society." In other words, the EU was partly designed as a guarantor of civic space. The contestation of LIFE reveals a paradox: the same institution that was constructed to protect participatory democracy is now, from within, portraying Buyse's indicators of its erosion. Technically, it is not dealing with democratic backsliding as one would argue in the Hungarian case, as there is no formal autocrat or law explicitly banning NGOs. Nonetheless, the cumulative effect of stigmatisation, funding conditionality, and discursive delegitimation that results from sustained stigmatisation produces a "chilling effect" of self-censorship and reduced capacity, without a single prohibitive act.

In other words, the European Union funds NGOs because they provide what the Commission cannot generate internally: legitimacy, expertise, and grassroots reach as detailed in the EU' Strategy for Civil Society (European Commission, 2025). The very

characteristics that made LIFE functional and logical to begin with (a Commission-NGO partnership to embed diverse voices into the policy-making process) are what made it politically vulnerable when the priorities shifted.

5.2 Evolution and funding phases

LIFE I and II ran from 1992 to 1999 with perhaps modest funding and scope: LIFE I encompassed 731 projects, and €450 million was destined for LIFE II. These phases, however, established the precedent that the EU would co-finance civil society to implement environmental regulations that member states lacked the capacity or will to enforce at the national level. The same governance rationale marked the evolution of the subsequent stages: LIFE+ (2007-2013) introduced the flagship Environment policy and governance strand. For the first time, building civil society's ability to participate in governance became an intrinsic part of LIFE, not just on the sidelines.

The European Green Deal was launched at the current stage of LIFE (2021-2027) with a funding of €5.4 billion and four subprogrammes, one of which included clean energy. This phase is the most ambitious, most politically visible one so far, and at the same time, the most exposed. LIFE's progress and expansion into politically contested policy areas, such as agriculture, the fossil fuel phase-out, and industrial development, grew. The greater LIFE's ambition, the greater the intrusiveness into the status quo. This, in turn, increased the programme's vulnerability to communitarian backlash.

5.3 Rationale behind a funding programme for European environmental, climate and energy non-profit organisations

The Treaty on the Functioning of the EU (TFEU) places civil society organisations at the core of the EU's policymaking, as they are crucial actors in, among other things, raising awareness, improving governance, and ensuring democratic representation of the general interest. Article 15 of the TFEU recognises their role in the EU's good governance (Eurlex, n.d.).

To ensure an effective and accurate development, implementation, and enforcement of EU environmental and climate policy, an open and transparent dialogue with all stakeholders is essential. For this reason, CSOs act as a bridge between local communities and policymakers, voicing their concerns and representing citizens' interests, which might otherwise be overlooked (Zimmer et al., 2020). In the CINEA website, it is stated that "their

presence is important to provide a sound democratic contribution, and a level-playing field with other actors in the EU arena (CINEA, n.d.).

CSOs' know-how and engagement (advocacy, in this case) contribute to preparatory work and expert groups through conducting research and studies (such as feedback, improving the knowledge base, and helping shape European policy). Examples of their contributions can be found through flagship projects related to the European Green Deal, among others, as well as in the Nature Restoration Law.

Furthermore, the European Commission has the “right of initiative” under Article 17(2) of the Treaty on the Functioning of the European Union (TFEU). This leads to the need to address a democratic deficit (Kohler-Koch & Quittkat, 2013), in which CSOs emerge as partners closer to citizens, and projects covered by the LIFE programme ensure the implementation of these environmental regulations.

5.3.1 The role of advocacy in civil society

As set out in Article 3 of the LIFE regulation, the programme's main objective is “to contribute to the shift towards a sustainable, circular, energy-efficient, renewable energy-based, climate-neutral and resilient economy, in order to protect, restore and improve the quality of the environment, including the air, water and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystems, including by supporting the implementation and management of the Natura 2000 network, thereby contributing to sustainable development.” (Regulation (EU) 2021/783).

5.3.2 Funding types

An essential aspect of this case study requires understanding the different types of funding that LIFE provides. Article 11 of the LIFE regulation makes it clear that “operating grants shall support the functioning of non-profit making entities which are involved in the development, implementation and enforcement of Union legislation and policy, and which are primarily active in the area of the environment or climate action, including energy transition” (Regulation (EU) 2021/783). These operating grants enable many civil society organisations to survive and create a level playing field with business-driven organisations, which tend to have more resources to advocate and influence policymaking (Viravaidya & Hayssen, 2001). Unlike project-specific funding, operating grants cover all the costs required

for beneficiaries to function, without specifying what the funds may cover, as outputs are not tracked (e.g., Client Earth case).

The Framework Partnerships Agreements for the 2024 Call for Proposals for non-profit making entities under LIFE “aim to strengthen the participation of civil society in the EU policy dialogue, as well as to support implementation and enforcement of Union environmental and climate objectives, including clean energy transition, by the beneficiaries.” (FTPO, n.d.) As well, “grants that support the functioning of non-profit making entities which are involved in the development, implementation and enforcement of Union legislation and policy, and which are primarily active in the area of the environment or climate action, including energy transition, in line with the objectives of the LIFE programme.” (CINEA, n.d.)

Operating grants from the LIFE programme amount to approximately €15.5 million annually, representing approximately 0.3% of the total LIFE budget of €5.4 billion for 2021-2027 (European Commission, 2025; CINEA, n.d.). Along the same lines, NGOs account for approximately 2.4% of total LIFE beneficiaries, while the largest share of funding goes to Member States, research centres, universities, and SMEs.

5.3.3 Key beneficiaries and their governance role

Even though the beneficiary organisations vary each year, 20 to 40 organisations are granted funding per call for applications, depending on the quality of the applications, the amounts requested, and the total available budget. Some of the beneficiaries of the 2024 call for operating grants included the European Environmental Bureau, WWF European Policy Office, Institute for European Environmental Policy (IEEP), Zero Waste Europe, Carbon Market Watch, and more.

Figure 1 illustrates the share of beneficiaries, by type of organisation, from 2021 to 2024. Over these years, private companies have consistently secured a quarter of available funding, followed by public bodies and not-for-profit organisations (NFPOs). Non-governmental organisations that benefit from LIFE receive a contracted amount of 7% to 12%.

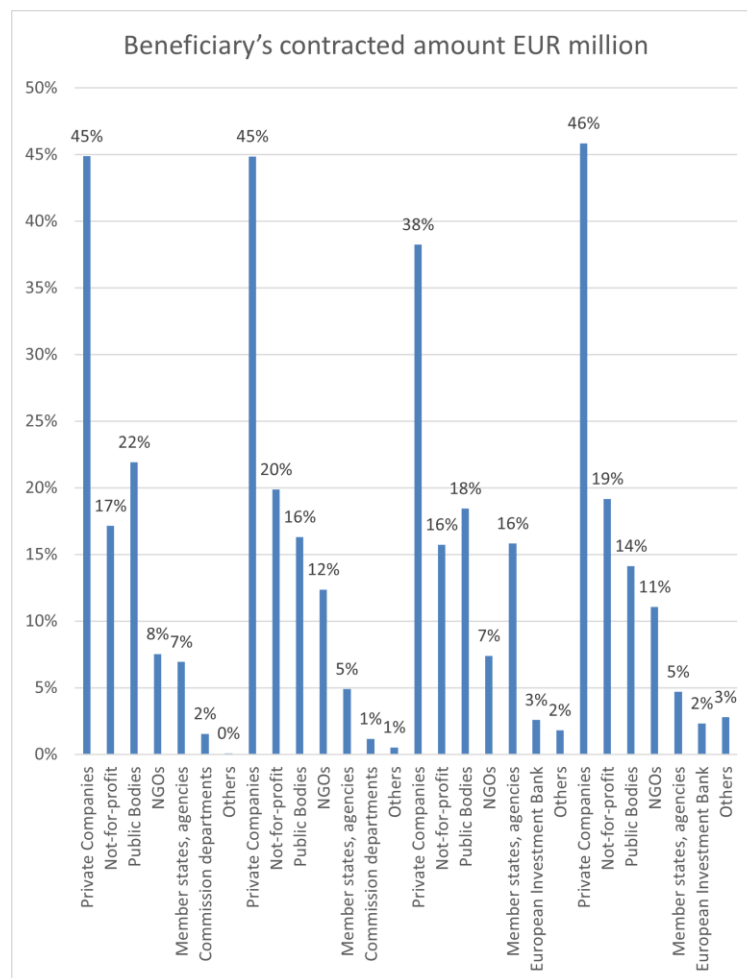


Figure 1. Beneficiaries of the LIFE programme from 2021 to 2024 (from left to right), breakdown by type of organisation. Source: Financial Transparency System (FTS), own elaboration.

The 2024 Operating Grants Framework Partnerships (LIFE-2024-NGO-OG-FPA) outlines the following conditions for funding:

It is important to note that the 2026 Call for Proposals regarding operating grants to support non-profit organisations has not been released by the time of writing, which would be expected to reflect the politicisation.

5.4 Sequence of events: The political contestation in the making

Between 2019 and 2021, the European Green Deal was the European Commission's top priority, and LIFE operating grants funded environmental CSOs without major contestation, or, in other words, with permissive consensus. The first sign of disruption, or constraining dissensus, arrived in December 2022 with the Qatargate scandal. This event, despite its concern with third-country interference through fake CSOs and its lack of relation to LIFE, paved the way for a discursive opening in which scrutiny of all NGO funding could

be prompted with little to no evidence. A director at an NGO active at the EU level (personal communication, 2026) characterises this scandal as the supplier of “ammunition to actors already hostile to civil society.” At the same time, Beck visualises it as “the moment the EPP found a legitimating frame for a campaign they had already decided to run.” In other words, the scandal itself did not generate hostility but rather supplied a legitimate vocabulary for an already existing hostility (Beck, personal communication, 2026).

There were three key institutional developments in 2023. The European People’s Party had strategically repositioned under the leadership of Manfred Weber and Jens Spahn, dating the anti-NGO stance to this period and locating its origins in domestic German politics (Beck, personal communication, 2026). The CDU launched a campaign to scrutinise German CSOs, ultimately submitting more than 400 parliamentary questions to those receiving public funds. In Buyse’s terms (2018), this is lateral learning working at the domestic level within a member state. In parallel, a Director at an environmental NGO active at the EU level identified the backlash against the Nature Restoration Law as the triggering event for EU repositioning: environmental NGOs had been instrumental in building the majority for the law, and, in her opinion, the EPP identified weakening NGO capacity as a strategic priority following that defeat (Director, personal communication, 2026).

In 2024, farmer protests across Member States exerted sufficient political pressure on environmental regulation, which would later provide the political environment for LIFE-specific interventions (Finger et al., 2024). The Commission’s new priorities, as portrayed in the Competitiveness Compass, signalled a shift in the agenda: simplification of legislation that some stakeholders, including CSOs, would interpret as a “deregulation drive” (The Good Lobby, 2025). On top of that, the geopolitical reorientation that followed Russia’s invasion of Ukraine had already shifted budgetary priorities away from the Green Deal frame within which LIFE-funded NGOs operated.

It was not until May 2024 that the first institutional act aimed at LIFE arrived, when the Commission issued its “Guidance on funding for activities related to the development, implementation, monitoring, and enforcement of Union legislation and policy.” This document distinguishes between activities that “do not represent a reputational risk,” such as capacity building, analytical work, policy briefs, and awareness campaigns, and those that “may entail a reputational risk for the Union.” (European Commission, 2024). In the latter, the following specification is given: “funding agreements requiring beneficiaries to undertake specifically detailed activities directed at EU institutions and some of their

representatives.” Furthermore, the Guidance instructs authorising officers to ensure compliance with this and its applicability to all programmes.

Eight months later, in January 2025, the European Parliament held a debate on “EU financing through the LIFE programme of entities lobbying EU institutions and the need for transparency.” Leading the debate was MEP Monika Hohlmeier, who presented operating-grant agreements which, according to her, contained advocacy clauses inappropriate for Commission financing. These contracts had been admittedly obtained through whistleblowers rather than through the EU’s public disclosure architecture.⁸ Commissioner Piotr Serafin conceded that it had been “inappropriate for some services in the Commission to enter into agreements that oblige NGOs to lobby MEPs.” At the same time, he emphasised the Commission’s commitment to supporting CSOs and that no rules were broken.

The European Court of Auditors published the Special Report 11/2025 on transparency of EU funding to NGOs, five weeks after the plenary. The Court found that “the transparency of EU funding granted to NGOs has been hampered by inconsistent classification of NGOs and issues impacting data quality” (ECA, 2025). As a recommendation, they suggested that the Commission classify NGOs consistently, improve the quality of EU spending data, and actively verify compliance with EU values. There has been no record of contesting the audit’s rigour, as the recommendations were technical and the scope extended solely to classification and data quality.

Although it did not recommend restricting funding in advocacy, the European Parliament established a Scrutiny Working Group on NGO financing, whose work is still ongoing at the time of writing this thesis. Consequently, CINEA introduced contractual amendments in the 2024 Call for proposals, as per the Commission’s Guidance. The latest institutional reaction came from the Commission’s preliminary proposal for the 2028-2034 Multiannual Financial Framework, in which LIFE would get absorbed into the European Competitiveness Fund, effectively ending the permissive consensus around LIFE as a standalone programme.

⁸ The debate will be further discussed in the framing theory subsection.

6 The Transparency Gap: One disclosure system to rule them all?

As explained in the previous chapter, one side of the political contestation is raised under the banner of transparency concerns. Before assessing the empirical merit of that claim under H1, the disclosure architecture to which LIFE-funded organisations are subject must be discussed. The architecture is *de jure* vast but *de facto* fragmented, resulting in the lack of a single system that aggregates funding, contracts and advocacy data into a traceable record. The gap between formal disclosure of this information and effective traceability creates the condition under which procedural compliance and perceived lack of transparency can coexist. In other words, here is where the framing of LIFE-funded ENGOs as lobbyists acquires rhetorical viability, irrespective of its validity.

6.1 An overview of the disclosure architecture

The architecture operates at two layers, as summarised in Figure 2 (drawing on European Court of Auditors, 2025; Ackermann, 2023):

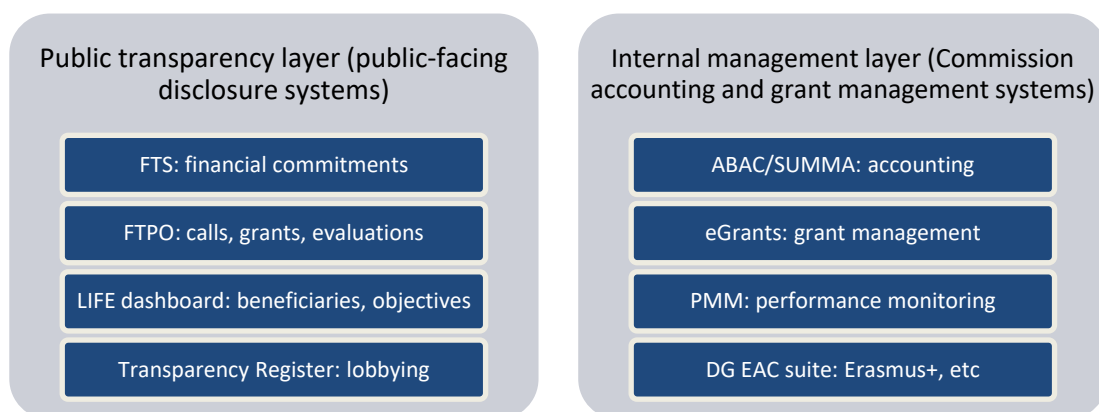


Figure 2. Layered disclosure architecture of LIFE-funded organisations. Source: Ackermann (2023), European Court of Auditors (2025); own elaboration.

The public-facing layer (left) comprises four systems that operate under different regulatory frameworks and for administrative purposes. The Financial Transparency System (FTS) discloses first-level commitments under direct and indirect management, pursuant to Article 38 of Regulation 2024/2509 (2024). The Funding and Tenders Portal (FTPO) hosts calls for proposals, evaluation procedures and summary descriptions of selected projects, including the LIFE NGO Operating Grant Framework Partnership Agreement. The LIFE Public Dashboard, managed by CINEA, published details on beneficiaries, EU contribution amounts and grant objectives (European Commission, 2025a). The EU Transparency

Register, operating under a separate interinstitutional agreement, records interest representation activities of organisations engaging with EU institutions.

The internal management layer (right) comprises the Commission's central accounting system (previously ABAC, now SUMMA) and the eGrants suite. These systems are not publicly available, but they serve as the upstream source from which all downstream disclosures are derived; data quality issues at this level propagate throughout the entire architecture (Ackermann, 2023).

Moreover, behind these two layers are the recipient-level obligations set out in Articles 19, 21, and Recital 28 of Regulation (EU) 2021/783 (2021). Article 21 requires beneficiaries to visibly acknowledge the Union's funding; Article 19 imposes monitoring and reporting obligations that channel project-level output and impact indicators back to the Commission. Recital 28 articulates a heightened transparency principle for strategic projects involving multiple funding sources.

6.2 The structural fragmentation: explained

These two dimensions, along with the recipient-level obligations enshrined in the LIFE Regulation for 2021-2027, contribute to the gap between formal disclosure of information and effective traceability. As stated above, each publicly accessible system was designed to serve a distinct administrative purpose: budgetary accounting (FTS), procurement and grant administration (FTPO), programme monitoring (LIFE Public Dashboard), and oversight of interest representation (Transparency Register).

The European Court of Auditors (2025) found that the categorisation of recipients as NGOs in FTS is based on self-declaration, resulting in a blank field in over 90% of cases. Additionally, the Commission does not verify the self-declaration of NGOs being independent from government in their governance bodies or whether they pursue their member's commercial interests (ECA, 2025, paras. 17-24). Regarding typology, the different systems do not have a common definition of NGOs, with 17 recipient categories in the LIFE Public Dashboard and 103 in the Erasmus+ Project Results Platform, for instance (Ackermann et al., 2023).

Regulation 2024/2509 (2024) requires commitments to be published only to first-level recipients (entities that receive funds directly from the Commission or its implementing partners). Sub-grants and second-level recipients are not taken into account in FTS (ECA, 2025, paras. 25-34). The ECA recommended extending this coverage to second-level

recipients too, with a target implementation date of 2029 (ECA, 2025, Recommendation 2). This has crucial implications for the debate at hand: a Brussels-based NGO that receives an operating grant and partially redistributes it to a national member organisation will only appear in the FTS at the first transaction, while the rest of the chain remains opaque.

6.3 Financial visibility versus activity-level traceability: ClientEarth

With all this in mind, it is not possible to verify, solely from publicly accessible sources, which specific activities a LIFE operating grant has funded. Client Earth, an international environmental organisation, has faced backlash for this reason.

In June 2025, media coverage reported that the Commission had funded ClientEarth with € 350,000 under LIFE to pursue litigation against coal-fired power plants (Welt am Sonntag, 2025; Brussels Signal, 2025). MEP Anna Brylka (P/E) submitted a written question requesting that the Commission publish the 2022 grant agreement, the work programme, communications between both stakeholders on funded legal actions, and any indication of pressure exerted on the litigation strategy (Brylka, 2025). In response, the Commission confirmed that the requested documents had been sent to the Parliament's BUDG Committee under the confidentiality agreement. It redirected the LIFE Public Dashboard for further details (European Commission, 2025b). It further denied any exchange of information with ClientEarth on the legal actions in question. It reiterated the beneficiaries' "full independence in deciding the content and implementation of their work programme" (European Commission, 2025b).

This is an illustration of the transparency gap: the financial commitment and objectives were disclosed, the contracts and work programme exist and are accessible to the Commission and the BUDG Committee, but are not open to public access. This confidentiality clause is in place for a reason; the tension is clear from both sides. This gap "creates space for competing interpretations of the same funding decisions" (Politico Pro Analysis, 2026, p. 7). This logic is consistent with H2: a politically contestable activity (such as climate litigation) is reframed as illegitimate regardless of procedural compliance, because it advances a specific policy position that clashes with the opposition.

6.4 A transparency-framed contestation?

This chapter draws on Regulation (EU) 2021/783, Regulation (EU) 2024/2509, the European Court of Auditors (2025), Ackermann et al. (2023), parliamentary questions

(Bryłka, 2025; European Commission, 2025a), and interviews with beneficiary representatives. The grant agreements, technical annexes, and work programmes were not accessible for this research. This limitation is itself empirical evidence: a transparency-framed contestation remains rhetorically viable to assess. Beneficiary organisations can demonstrate procedural compliance, while critics can simultaneously allege intransparency because no single public source consolidates the funding transactions into an activity-level record.

7 Process Tracing in LIFE

The previous chapters have attempted to reconstruct the chronological order of the LIFE contestation and identity actors, frames, and systems that converged on the programme between 2022 and early 2026. This chapter will turn that reconstruction and put it to the test, adjudicating between the two hypotheses set out in Chapter 2: H1 holding that the contestation was primarily motivated by transparency concerns about compliance gaps in LIFE operating grants; and H2 holding that the contestation was a strategic opposition to the policy influence of environmental CSOs.

This chapter applies the tests from weakest to strongest so that the cumulative weight of the evidence can be assessed at each stage (Ricks & Liu, 2018). The first section will cover the straw-in-the-wind, establishing a pattern without yet judging between hypotheses. The following section covers hoop tests for H1, and any failure is sufficient to eliminate H1 in its strong form. Consequently, the smoking-gun test evidence is presented to assess the validity of H2. Finally, a cumulative verdict is presented, with a brief discussion of H3 and H4 as counterfactuals.

However, it is important to note that process-tracing methodology yields probabilistic conclusions rather than deterministic ones (Bennett & Checkel, 2015). Additionally, this process tracing follows the Bayesian framing⁹.

7.1 *Hypotheses and observable predictions*

Process-tracing analysis brings together two main hypotheses to explain how the political contestation of LIFE unfolded. Each hypothesis generates a set of observable predictions that will be assessed against the institutional records, the targeting patterns, and a compilation of statements well-documented in previous chapters.

- **H1 on accountability-driven contestation:** The contestation of LIFE's operating grants was primarily motivated by genuine concerns about transparency gaps in the management of EU-funded environmental NGOs. Under this premise, audit findings that identified deficiencies in grant management preceded and triggered a later political

⁹ For each piece of evidence, the diagnostic logic asks two questions: (1) how likely the evidence would be observed if the favoured hypothesis were true? Moreover, (2) how likely would it be observed if the rival were true? The ratio of this likelihood determines the probative weight of the evidence and shifts the prior probability across the rival hypotheses (Fairfield & Charman, 2017). Thus, no single piece of evidence is treated in isolation as conclusive, and the conclusions are calibrated to the cumulative weight of evidence rather than deductive proofs.

mobilisation. Furthermore, the institutional response to these findings was proportionate to the identified problems, and the targeting of specific beneficiaries (NGOs, in this case) followed a reputational risk-based logic that aligned with compliance vulnerabilities rather than with the organisation's policy positions.

In the case that H1 is correct, these are the observable predictions: (a) the ECA's findings should identify substantive compliance failures regarding LIFE, (b) the political contestation should surface after the audit findings are published, (c) once compliance is confirmed, if so, the contestation should de-escalate, (d) the institutional reaction should be proportionate to the deficiencies identified, and (e) the targeting should track compliance risk.

- **H2 on politically-driven contestation with transparency framing:** The contestation of LIFE's operating grants was primarily motivated by strategic opposition to the policy influence of environmental CSOs, weaponising transparency and accountability as a legitimising frame. Under this premise, political mobilisation occurred independently of audit findings, as the transparency frame was deployed instrumentally to delegitimise advocacy capacity. Furthermore, the institutional reactions would exceed what the audit findings warranted, as they were driven by political pressure rather than a proportional response to the identified deficiencies.

In the case that H2 is correct, these are the observable predictions: (f) political mobilization should precede the ECA's findings, (g) the contestation should persist or intensify after the compliance, if so, is confirmed by the audit, and (h) targeting should correlate with the policy alignment of beneficiaries, (i) the debates around it (e.g., plenary at the European Parliament) should reveal substantial concerns over NGO advocacy itself, and (j) the institutional remedies should focus on the future of NGO advocacy capabilities and not structural vulnerabilities.

The following sections test these predictions using the four-test typology. Predictions from (a) to (e) make up the hoop tests for H1: failure of any is sufficient to eliminate H1 in its strong form. Predictions (h) and (i) are used as smoking-gun tests for H2: their presence is sufficient to substantiate the confidence in H2. Prediction (j) reinforces the smoking-gun inference. Finally, two counterfactuals are briefly discussed in the last subsection.

7.2 Causal sequence graph

Chapter 5.5 established the causal sequence of events that have been crucial to understanding the politicisation of the LIFE programme, and it is illustrated as follows:

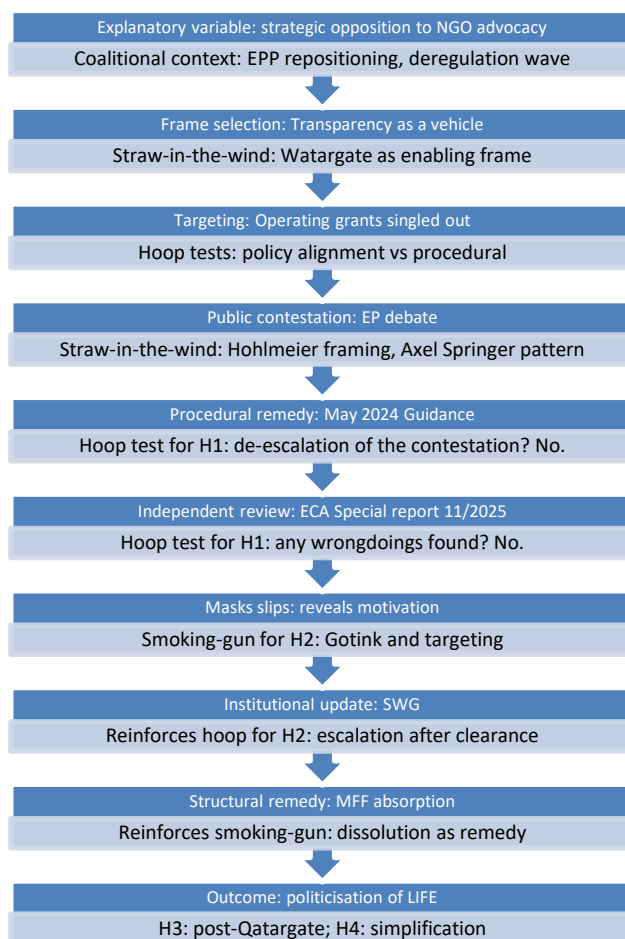


Figure 3. Causal sequence graph. Mechanism (in blue) is how X produces Y. Evidence (white) is what observations bear on each step. Source: own elaboration.

Once the causal sequence is constructed, two features stand out for the tests that follow. Firstly, the Commission Guidance (May 2024) preceded the ECA Special Report (February 2025). This suggests that the Guidance may not have been based on ECA audit findings. Secondly, the EP plenary debate (January 2025) also preceded the ECA's report by five weeks. Altogether, the political contestation against LIFE ran ahead of both the Commission's self-correcting actions and the audit's findings. Notably, the directionality of arrows in Figure 3 is not deterministic, as each arrow is a probabilistic claim that the events at the top shifted the outcomes along the illustration.

7.3 *Straw in the wind test (H2)*

This test brings together a wide range of evidence that establishes, at least, three asymmetric patterns without regard to the hypothesis at hand. The straw-in-the-wind test is mainly analysed for H2 (politically motivated strategy against NGOs). For example, Parliamentary interventions (including parliamentary questions) and media scrutiny intensifies instead of subsiding after the publication of the ECA report¹⁰. Another piece of evidence is that the most-scrutinised NGOs (ClientEarth, EEB, WWF) are those most visibly active (or salient) on contested legislative files (CINEA, n.d.). In Germany, the conservative Christian Democrats (CDU) tabled more than 400 parliamentary questions to CSOs who received state support, signalling heavy scrutiny and possible lateral learning (DW, 2025; Buyse, 2018; Beck, personal communication, 2026). On the same line, Heritage Foundation, a conservative think tank from the United States backing Trump, have held several private meetings with lawmakers from far-right parties across the EU. “Just in the past 12 months, the group held seven meetings with members of the European Parliament, compared to just one in the five years prior” (Politico, 2025).

Furthermore, this can be traced back to an EPP strategic repositioning under the leadership of Weber and Spahn, focusing heavily on attacking NGOs (Beck, personal communication, 2026). Faustine Bas-Defossez, working in the Nature, health and environment department at the European Environmental Bureau (EEB) signals the Nature Restoration Law as a turning point in the public discourse regarding NGOs, as civil society pushed through “the controversial regulation in face of fierce opposition from the EPP and other right-wing groups” (The Parliament magazine, 2025).

7.4 *Hoop test (H1 and H2)*

For H1 to be correct, the relevant audit authority should have flagged any wrongdoing. The ECA Special Report 11/2025 found no wrongdoing. Commissioner Serafin confirmed that no rules were broken, however, he initially conceded that some clauses were “inappropriate” (European Parliament, 2025). Politico examined contracts and found no violations (Politico, 2025). The Commission issued a guidance prohibiting lobbying clauses in grant agreements as a procedural remedy, however the contestation persisted (European Commission, 2024). The issuance of the Guidance in the first place is consistent with

¹⁰ In the past 5 years, the term NGO funding has peaked worldwide regarding web searches in February 2026 and October 2026 (Google Trends, n.d)

legitimate transparency concerns. In conclusion, the existence of internal management concerns does not negate H2's strategic mechanism, but it does support a refined formulation in which H1's concerns play a contributing role, even if it is not the primary mechanism.

For H2 to be correct, the transparency framing should be necessary, but not sufficient; other political motivations should be identified. Commissioner Serafin initially acknowledged some clauses were "inappropriate." The Commission issued guidance on NGO funding in 2024, setting the minimum transparency standard that H2 must meet; it is not eliminated.

7.5 Smoking-gun test (H2)

In one of the most recent meetings of the Scrutiny Working Group on NGO funding, MEP Dirk Gotink implied that the scrutiny was not about the legality of the LIFE funding, but rather about whether the EU should have provided such support (Director at environmental NGO active at EU level, personal communication, 2026). According to the newspaper, MEP Dirk Gotink said during a scrutiny hearing that: "The problem that we're pursuing here is not to establish whether things are illegal, it is to establish whether politically it is undesirable" (EUobserver, 2026). This statement is significant because it confirms that the contested parameter is the desirability of EU-funded advocacy, not the initial procedural compliance complaints of grant recipients, which the ECA had already dismissed. It is sufficient to confirm H2, as it comes from within the attacking coalition and removes the transparency justification.

Furthermore, the institutional remedy fits the smoking-gun test to disprove H1 and reinforce H2's claims of a manufactured attack strategy. If H1 were correct and the contestation was accountability-driven, the appropriate remedy would be procedural: tightened audit mechanisms, stricter reporting requirements, or enhanced oversight. Instead, the reaction prompts the absorption of LIFE into the ECF, as proposed in the 2028-2034 MFF (European Commission, 2026). The dissolution of LIFE as a standalone programme is a remedy tailored to a substantive problem: the existence of a funding stream with a particular policy orientation. If the problem is the desirability of EU-funded environmental advocacy, following H2, the solution is indeed the removal of advocacy-enabling instruments.

The resulting configuration is highly expected under H2 and difficult to reconstruct under H1 except through auxiliary hypotheses whose plausibility is not independently supported. No single entry would be sufficient on its own.

7.5.1 Framing Analysis: EP Plenary debate on NGO financing

The European Parliament debate of January 22nd, 2025, on EU financing through the LIFE programme is, on the surface, a budgetary matter concerning operating grants to environmental NGOs. The most salient narrative of the verbatim report is, undeniably, the NGO-as-lobbyist frame: a construction by some Members of the European Parliament (MEPs) that portrays EU-funded ENGOS as undercover lobbyists rather than legitimate participants in EU governance. The plenary debate is not merely descriptive of MEPs attitudes but can be operationalized (as seen with the creation of the Scrutiny Working Group) to produce institutional pressure and escalation.

The first step is to establish and define the problem. Dirk Gotink (EPP) captures the frame's diagnosis on economic terms: "a system of financing, what I would call a kind of 'shadow lobby', funded by the Commission." The idea that some LIFE grants contained advocacy clauses is rapidly transformed into a structural pathology, inflating the scope of the debate to all LIFE-funded ENGOS. Monika Hohlmeier (EPP) describes "guidelines for the manipulation of legislative procedures, with content and number of amendments for trilogues and votes for MEPs." Later, Thomas Geisel (NI) generalises that "the European Commission pays its own lobbyists." Additionally, the actors under scrutiny are no longer referred to as NGOs or CSOs, but by new ontological terms: activist networks¹¹ (Hohlmeier), self-appointed environmental lobby¹² (NI MEP Thomas Geisel), shadow lobby (Gotink), or professionals at capturing public money (EPP MEP Céline Imart). Furthermore, MEP Sander Smit (EPP) invokes the *trias politica*: "executive power has been financing lobbyism towards us as a controlling power." This successfully reframes the issue from administrative impropriety into a foundational threat to the rule of law.

Consequently, the frame needs to diagnose the causes, and in the plenary debate, it attributes the problem to a wide range of strategic culprits. Institutionally, fingers are pointed at some Directorates-General (such as DG ENVI) under the leadership of former

¹¹ Translation by the author. Original: Aktivisten-netzwerke

¹² Translation by the author. Original: Selbsterwählte umweltlobby

Commissioners (Timmermans, Sinkevičius). Ideologically, “green” networks use public money to influence the Commission and steer policy preferences. Particularly, for Geisel, the cause is the Green Deal itself, as “a multi-million euro deal between the Commission and a self-appointed environmental lobby.” The structure here is agent-rich and structure-poor as the frame personalises instead of examining the LIFE operating-grant instrument’s institutional incentives. MEP Niclas Herbst (EPP) constructs the frame around a circular flow of public money, as: “people in the Commission paid by European taxpayers pay NGOs with European tax money, who then lobby MEPs paid by European tax money.” This retelling renders the entire EU system suspect by association.

The moral evaluation is threefold. Firstly, public money is being misused: Dick Erixon (ECR) brings up “serious abuse of taxpayers’ money”; Sergio Berlato (ECR) characterises it as “pure madness”; Imart calls out the “destruction of our productive forces.” Taxpayers are referred to as the legitimate principal whose authorisation has been abused. Secondly, the integrity of legislation has been corrupted. In essence, the frame calls for a democracy in which legislators must be free from manipulation by executive-funded advocacy. Gotink phrases it as “we are trying to make sure that the laws we produce here can be trusted and can have integrity.” Moral analysis is not the existence of advocacy per se, but the strings that come with it. However, it is important to note that other EU funding programmes (Horizon, CAP) are exempt from such scrutiny. Thirdly, the frame is operationalised by association with prior scandals. MEP Angelika Winzig (EPP) invokes “the socialist Qatargate scandal” to reinforce more control over NGOs. Imart compares LIFE clauses with “Erasmus funds attributed to Islamist entities.” In this move, LIFE is stigmatised by being placed in semantic proximity to a negatively charged occurrence. The factual basis of the debate is not in these arguments, but the goal is to taint the programme by proxy. Lexically, Geisel considers NGOs as drivers, paid applauders, and lobbyists.¹³ These denominations strip actors of authentic conviction, signalling covert coordination.

When suggesting remedies, the debate prescribes modest treatments. The most concrete demand is Hohlmeier’s: EU funding must be tied to clearly defined objectives consistent with EU legislation, its disbursement must be traceable, the Internal Audit Service must appropriately audit contracts, and only organisations registered in the EU Transparency Register should receive support. The latent prescription, however, is more restrictive. Erixon proposes redirecting LIFE’s “EUR 2 billion for climate policy activism” to Frontex. MEP

¹³ Translation by the author. Original: Antreiber, clauqueure, lobbyisten.

Ana Catarina Mendes (S&D) expresses that “this debate... is to say that we do not want to continue funding non-governmental organisations.” Following this line of thought, the prescriptive ambiguity in the framing is a strategic move that allows the MEPs to disclaim their intention to defund, even as the debate moves in that direction.

The counter-framing is naturally mobilised by the S&D, Greens/EFA, Renew, and The Left. Initially, the asymmetry in influence and financial resources is brought up. MEP Daniel Freund (Greens/EFA) cites that “companies spend six times more on lobbying... than NGOs.” MEP Lena Schilling (Greens/EFA) reduces the contested grants to “0.006% of the EU budget.” MEP Jean-Marc Germain (S&D) contrasts Shell’s €4 billion in lobbying with €2 million in LIFE operating grants. Furthermore, MEPs call on the selective targeting component of the debate. MEP Martin Hojsík (Renew) lists EU-funded actors with advocacy clauses (industry associations, Parliament’s pilot projects) and asks why ENGOs alone are scrutinised. To much contention, MEP Jonas Sjöstedt (The Left) notes that Hohlmeier sits on the supervisory board of BayWa AG, an agricultural firm that receives LIFE funds. This counterbalancing act also sheds light on the democratic backsliding implications of this debate. MEP Maria Ohisalo (Greens/EFA) says, “We are witnessing in real time how country after country falls into autocracy,” and asks whether “this is really the time we want to see the civil society in the EU suppressed.” Toussaint converts this diagnosis into a prognosis: “Today the NGOs, who is next tomorrow? Whistleblowers? Journalists? Scientists?”

Overall, Commissioner Serafin’s position is ambiguous and can fit all the indicators. While he concedes there were inappropriate clauses and reiterates the Commission’s Guidance, he also resists the frame in its entirety: “There is no question of cutting financing to the NGOs that are engaged in the European public debate.” This tension seeks to mitigate political pressure while preserving LIFE’s underlying normative architecture.

7.6 Cumulative verdict

In short, H1 fails both hoop tests in their strong form, meaning the necessary condition of documented compliance failures is not met, and the proportionality requirement of the institutional remedies is not met. Regarding H2, it passes three smoking-gun tests comprising the Gotink statement, the framing analysis of the EP plenary debate, and the form of the proposed institutional remedy. Each is individually sufficient, as their conjunction under H1 is improbable and predicted for H2.

Under the Bayesian framing of process tracing (Bennett, 2015; Fairfield & Charman, 2017), the cumulative evidence updates the probabilities established by the straw-in-the-wind tests to a stronger favour for H2.

This verdict does not include the accountability concerns from H1 which are believed to have played a crucial role in the political contestation. Nonetheless, it does reject the strong form of H1 claim that accountability concerns alone provide a sufficient explanation for the developments in the LIFE programme. The probabilistic verdict is consistent with H1 as a secondary mechanism, side by side to H2 as the primary mechanism. In other words, there might have been accountability and transparency concerns raised fairly as explained in the Transparency Gap chapter, but the core argumentation for the discursive strategy is rooted in H2: a politically motivated strategy that has stigmatised and delegitimised NGOs.

This verdict is minimally sufficient for the LIFE case and is not intended to support the generalisation of these findings to other instances of EU funding contestation.

7.7 Counterfactual analysis

A counterfactual hypothesis in process tracing is a rival explanatory mechanism whose observable predictions differ from the primary hypothesis (H1 on accountability and H2 on politically motivated strategy, in this case) on at least one dimension. They test the robustness of the primary verdict against alternative interpretations of the same evidence. After careful review, two counterfactual hypotheses stand out: H3 proposes that the contestation is best understood as an institutional correction following the December 22 Qatargate scandal; H4 proposes that the contestation is best understood as a manifestation of broader Green Deal backlash and MFF budgetary constraints.

Table 1 Counterfactual arguments for the main hypotheses tested in process tracing

Counterfactual arguments	Predicted observation if true	Observed evidence	Judgement	Explanation
H3: Post-Qatargate institutional correction	Sector-neutral scrutiny across all EU-funded programmes and beneficiaries.	Scrutiny focused on ENGOs; corporations, research institutes, and other categories did not receive similar contestation or get their advocacy work portrayed a 'reputational risk.'	Falsified in strong form. H3 does not account for sectoral targeting.	Permissive condition ¹⁴ : Qatargate supplied legitimising vocabulary but did not generate the targeting pattern.
H4: Green Deal backlash and MFF budgetary pressures	Targeting tracks budgetary vulnerability, and the remedy is a budgetary cut or audit tightening (proportionality).	LIFE is absorbed into ECF; however, targets concentrate on operating grants (0,3% of LIFE budget). Thus, the remedy focuses on advocacy, not budget limits.	Falsified in strong form. H4 does not account for advocacy-specific remedy.	Permissive condition: the broader political environment created the opportunity within which H2's mechanism operated.

¹⁴ Contextual facilitators that ease constraints, allowing causal mechanism to operative.

The analysis of said counterfactuals demonstrates that while post-Qatargate scrutiny and MFF budgetary constraints have influenced the political environment, they do not serve as the primary causal mechanisms for the contestation of the LIFE programme. H3 predicts sectoral neutrality and is falsified by the fact that the scrutiny targeted specific organisations focused on the environment rather than all recipients of funding from EU programmes. H4 predicts that budgetary constraints (including competitiveness and simplification waves such as Omnibus) have influenced the scene; however, it is falsified in its strong form because the targeting focuses solely on operating grants rather than on the programme's broader financing lines.

Consequently, both counterfactuals are rejected as primary causal explanations but are retained as permissive conditions that lowered the threshold of mobilisation or created structural opportunities for allowing escalation. Qatargate lent lexical legitimacy to pre-existing hostility toward ENGOs; the convergence of Green Deal backlash and farmer protests provided a timely political stage for strategic targeting. The primary verdict remains robust: the political contestation of LIFE is best explained by the strategic mechanism of H2.

8 Implications: Civic space, democratic health and institutional consequences

8.1 *Assessing the shrinking civic space*

With the results of the process tracing in mind, the next step is to apply Buyse's (2018) four indicators of shrinking civic space: resource restriction, stigmatisation, co-optation, and legal and structural barriers.

Initially, the May 2024 Guidance explicitly restricts “specifically detailed activities directed at EU institutions” from operating-grant funding. Operating grants are the financial instrument that sustains NGO advocacy capabilities (€15.5M per year, accounting for up to 2.4% of LIFE beneficiaries). The next MFF proposal integrates LIFE into the European Competitiveness Fund, which is expected to reduce the allocation to OG.

Regarding stigmatisation, the previous chapter identified the following frames towards the LIFE-funded NGOs: “shadow lobby”, “Commission-funded lobbyists”, and “captured.” These frames have survived despite the ECA report finding no wrongdoing, evidenced in the later creation of a Scrutiny Working Group on NGO financing. Frames tend to be durable once they are established (Gamson, 1992). Stigmatisation functions both as a precursor and a legitimiser of the harder restrictions. Negative discursive framing prepares the political ground for legal and financial measures to become thinkable (Buyse, 2018). The framing seen throughout the EP debate includes pejorative renaming, civic-virtue inversion, and guilt-by-association with Qatargate and Islamism, which do not in themselves restrict any organisation. They reconstitute the discursive conditions under which restriction becomes politically tractable. The stigmatisation is not carried only by the far-right but also by the EPP, which lends the frame its parliamentary heft, while ECR and Geisel radicalise the discourse. The debate marks a transition in which the NGO-as-lobbyist frame moves from populist provocation to a mainstream policy lever at the EU's central institutional space rather than its “illiberal periphery.”

Following co-optation, there is little evidence that NGOs modified their advocacy in response to the Guidance, due to limited access to documentation and the time frame selected for this research. However, an open letter from Academics for NGOs (2025) expressed deep concern for these attacks and reiterated that NGOs are “crucial to ensure that research evidence directly informs policymaking and benefits the interests of society.”

Finally, there have been no formal legal and structural barriers to funding. However, the absorption of LIFE into a competitiveness-driven fund can function as a quasi-structural barrier without overtly forbidding it. At the supranational level, civic-space restrictions operate through procedural and architectural channels rather than through formal law (Buyse, 2018; Chaudhry, 2022).

Overall, three of Buyse's indicators can be identified in the LIFE documentation. In other words, civic-space restrictions at the supranational level can operate through procedural legitimacy claims and restructuring rather than prohibitive legislation. This could potentially extend Buyse's framework beyond its original subject of authoritarian regimes.

According to Buyse (2018), this selective targeting could translate into resource constraints and targeted pressure on the specific instrument that makes civil society effective in representing the general interest. The evidence that was presented to fuel the attack on NGOs, that being the operating grant agreements with advocacy requirements, was obtained through whistleblowers, as stated by MEP Hohlmeier. This transparency gap in accessing such documents is one crucial argument behind the politicisation of LIFE.

8.2 Death to LIFE? A look into the 2028-2034 Multiannual Financial Framework

As a result of the politicisation of the LIFE programme, its future in the Multiannual Financial Framework (MFF) has been the subject of much questioning. In its preliminary proposal for the 2028-2034 MFF, the Commission has indicated that LIFE will no longer be a standalone programme as it had been for the past decades. Instead, the Commission has integrated LIFE into the Competitiveness Fund, alongside other flagship projects such as Horizon Europe, Digital Europe, and InvestEU. This, on the one hand, can be seen as the expected strategy of the second Von der Leyen Commission to relieve administrative burdens and streamline funds.

Back to the smoking gun test, this institutional 'corrective' measure was predicted by H2, and its consequences extend beyond the analytical case; they bear directly on the future capacity of EU-funded CSOs to operate in contested policy domains.

The proposed absorption raises the question of whether a fund whose identity has historically depended on the right-fenced visibility of its environmental mandate can survive integration into a competitiveness-driven instrument without losing its core orientation. The EU's claim to be a participatory polity (TFEU Article 11) is in tension with the demonstrated

capacity of EU institutions to restrict participatory infrastructure under political pressure. The mechanism does not require formal democratic backsliding; it operates through legitimate procedural channels.

8.3 The health of participatory democracy in the EU

The conditions under which the LIFE programme has passed from operating with permissive consensus to being stigmatised and threatened with the end of their funding as a standalone programme in the next MFF (constraining dissensus) have been discussed throughout this thesis. Chapters 8.1 and 8.2 converge on a troubling implication for the health of participatory democracy in the EU. The tension can be portrayed as follows: the EU claims to be a participatory democracy, as enshrined in TFEU Article 11, yet EU institutions have demonstrated the capacity to restrict that participation under political pressure. Without the need for formal democratic backsliding, as documented in Hungary with a foreign-agents law or Russia's "undesirable organisations" legislation. This restriction operates through official institutional channels: Commission guidance notes, Scrutiny Working Groups, and MFF restructuring, despite being expected in illiberal regimes rather than in democratic settings like the European Union. The effect is analogous to signals of a shrinking civic space: resource restriction, stigmatisation, and the chilling of advocacy capacity.

This raises the question of: at what threshold does civic space contestation operating through legitimate institutional procedures cease to be a democratic correction and become a mechanism of democratic erosion? The case of LIFE does not cross the threshold without any alternative explanations, as no formal prohibitions have been enshrined in legal structures, and CSOs retain the right to advocate for the general interest. However, the analysis throughout this thesis suggests that there can be an institutional pathway for that tension as well.

Furthermore, the concept of democratic backsliding is too narrow in the current literature. It captures formal-legal changes but misses procedural and architectural change that produces equivalent or similar outcomes. This research is a theoretical contribution to this gap in the literature.

9 Conclusion: the pinnacle of LIFE

The present research has confirmed a shift from permissive consensus to sustained contestation of the LIFE programme. The programme went from technocratic functioning to its absorption into the ECF, possibly mitigating its impact and effectiveness. There are two competing discourses: H1, as genuine transparency concerns, and H2, as a politically motivated strategy to stigmatise ENGOs.

The cumulative verdict from the process tracing of the hypothesis supports H2 over H1. The reasons behind this result lie in the temporal mismatch (mobilisation against LIFE preceded the ECA Special Report 11/2025), the targeting towards ENGOs instead of other types of beneficiaries, the framing in the EP debate, and the proposed remedy of dissolving LIFE as a standalone programme rather than management correction, for example, in the Union's disclosure architecture. The latter (a system that is *de jure* vast but *de facto* fragmented) has implications for the EU's democratic health. The contestation is rhetorically viable regardless of the empirical merits of the beneficiaries, which is itself a structural problem to be addressed.

The theoretical contribution of this thesis adds to the existing literature on the politicisation of the EU's participatory infrastructure, showing how it can be politicised without formal democratic backsliding. Moreover, it contributes to the limited squeezing-civic-space literature, where the EU's internal restrictions can operate through legitimate channels (MFF proposals, Commission's guidance, EP's framing) rather than through overt legal prohibitions.

As the Scrutiny Working Group is ongoing and the MFF negotiations are not final, this research is limited in its ability to address future developments regarding the contestation. The inaccessibility of official grant agreements also limits the evidence that could support H1. In principle, the interview sample overrepresents one side of the contestation (supporting H2), even though this is mitigated by a balanced corpus of sources. The results also follow the explaining-outcome variant of process tracing; they cannot be generalised to other funding programmes.

Some of the pathways for future research include comparative work on other EU funding instruments (Horizon Europe, Erasmus+), a post-Multiannual Financial Framework outcome analysis once the 2028-2034 MFF gets adopted, or a quantitative content analysis of the SWG's final report, contrasting with the framing found in this research.

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ANNEX

ANNEX I: Semi-structured interview questions

Director, environmental NGO active at EU level

1. From inside your organisation, how did you experience the moment when a funding dispute that had been built quietly in the Budgetary Control Committee suddenly became a full public political crisis? What do you think triggered that escalation?
2. What is the democratic function is your organisation performing when it uses LIFE funding, and why does restricting it matter beyond your own institutional interests?
3. When the Commission's internal review and the Court of Auditors both found no wrongdoing, many expected the controversy to die down. It didn't. From your experience on the ground, why not? What does that tell you about how this kind of political attack actually works?
4. Do you see what happened to civil society in Brussels as part of the same phenomenon as what has been happening in Hungary or Poland? Is it categorically different because it is happening within a functioning democratic institution?
5. The Commission is now proposing to discontinue LIFE as a standalone programme entirely. Looking back at the last two years, do you think the political contestation directly contributed to that proposal and if LIFE disappears, what does that mean practically for civil society's ability to participate in EU environmental governance?

Christian Beck, Accredited Parliamentary Assistant of MEP Daniel Freund

1. From your perspective inside the Parliament, was the targeting of LIFE a strategic and coordinated decision by the EPP and its far-right allies, or did it emerge more opportunistically from the Qatargate fallout and the discharge procedure? In other words, was there a plan, or did the controversy take on a life of its own?
2. Both the Commission and the Court of Auditors confirmed that no NGOs had broken any rules. Why do you think the controversy kept going after that finding and what does that tell you about how political attacks on civil society actually work?
3. Daniel Freund's statement describes the working group as "undemocratic, non-transparent, and not based on facts." How did the working group's procedures diverge from normal parliamentary practice? Do you think those violations were deliberate or incidental?

4. One of the most striking moments in the January 2025 debate was Daniel Freund raising Monika Hohlmeier's €75,000 income from BayWa, a company that itself received €6.5 million from LIFE. How was that intervention received internally, and did exposing that conflict of interest change the political dynamics in any meaningful way?
5. The EPP argued that some LIFE-funded NGOs were not in the EU Transparency Register. From your experience working on that register, how legitimate is that argument? Does the same standard get applied to corporate lobbyists?

EU Advocacy Officer, environmental NGO active at the EU level

1. When (if so) did you first become aware that the LIFE program was becoming politically contested in a way that felt different from previous budget negotiations, and what was your initial read of what was driving it?
2. Commissioner Serafin acknowledged in January 2025 that some LIFE operating grant agreements contained inappropriate clauses, in that they obliged NGOs to target specific MEPs. From your position inside an organisation that holds a LIFE operating grant, how did you experience that admission, and do you think it accurately described what was happening in practice?
3. One of the central arguments made by EPP critics was that EU-funded NGOs represent a form of unelected influence over the legislative process, portrayed as a shadow lobby financed by the executive to pressure the legislature. What is your response to that characterisation, and how would you describe the democratic function that ENGOS perform in EU governance?
4. Beyond the contractual clause controversy, the Commission is now proposing to discontinue LIFE as a standalone program. Do you see a direct connection between the political contestation of 2023 to 2025 and that proposal, or do you think these are separate dynamics?
5. Looking at the broader pattern (like restrictions on civil society funding in Hungary and Poland, the USAID cuts in the United States, the LIFE controversy in Brussels), do you think what is happening to NGO funding in the EU is part of the same political phenomenon, or categorically different because it is happening within a democratic institutional framework?

6. What do you think this episode reveals about the structural vulnerability of civil society organisations that depend on public funding to perform their democratic function and is there a model of participation in EU governance that you think would be more resilient to this kind of pressure?

Director, European Parliament-funded conservative political foundation

1. From your perspective, is there a problem with the current model of EU public funding for civil society organisations engaged in advocacy work? If so, is it primarily a transparency issue, a democratic legitimacy issue, or something else?
2. The European Court of Auditors' Special Report 11/2025 found no wrongdoing in the management of LIFE operating grants. How do you reconcile this finding with the concerns raised about NGO funding in the European Parliament?
3. Critics of the scrutiny argue that corporate lobbying outspends NGO advocacy in Brussels by a ratio of roughly six to one. In your view, does restricting NGO funding without equivalent restrictions on corporate lobbying advance democratic accountability, or does it risk entrenching existing power imbalances?
4. MEP Dirk Gotink suggested in the Scrutiny Working Group that the question was not whether NGO funding was legal, but whether it was desirable. Do you agree with that framing, and if so, what criteria should determine whether civil society advocacy is considered desirable in EU governance?
5. Looking at the proposed absorption of LIFE into the Competitiveness Fund in the 2028-2034 MFF, do you see this as an appropriate administrative simplification, or as a structural consequence of the political contestation of the programme?