Democracy for Transition Coalition

D4T Coalition Joint Position Letter: Embedding Democratic Governance and Social Infrastructure in the Post-2027 MFF

Dear all,

As we approach the summer break and a critical period for the MFF negotiations, we are seeking to send a joint position document on behalf of the **Democracy for Transition Coalition (D4T)**, encouraging a focus on democratic governance, resilience-focused climate action, with resources and funding structures that are appropriate to that goal.

At a moment when the EU is restructuring its budget architecture around large, flexible and nationally-managed funding instruments, D4T believes it is essential to ensure that **democratic governance, civic participation and social justice** remain central to the implementation of European policy priorities and the allocation of EU funding. With discussions on the next Multiannual Financial Framework (MFF) now underway and trilogue negotiations expected to begin in autumn 2026, decisions taken in the coming months will shape the future architecture of EU funding and the extent to which these priorities are reflected in it.

Democratic participation can only be sustained when supported by strong **Democratic Social Infrastructure(s) (DSI)**, which represent the governance arrangements, civic capacities, networks, legal frameworks and resources that enable people and communities to participate meaningfully in shaping climate and wider environmental policies over time. Climate transition funding should therefore not only finance projects and policy measures, but also strengthen the democratic infrastructures that make long-term participation (of civil society), accountability (of corporations) and collective problem-solving possible.

This also requires protecting the information conditions that enable meaningful democratic participation. Investment in information integrity, media literacy and efforts to counter climate disinformation should be understood as integral components of democratic infrastructure rather than separate policy concerns. Ensuring that citizens have access to trustworthy information and are able to engage in informed public deliberation is essential for sustaining democratic participation and building public trust in climate transition processes.

The proposed MFF architecture and particularly the **National and Regional Partnership Plans (NRPPs)**, the restructuring of democracy programmes under **AgoraEU** and the increased flexibility granted to Member States, will not only shape how climate transition funding is allocated, but also who participates in decision-making, how priorities are set and whether local communities, civil society and affected groups are meaningfully involved in implementation and oversight processes.

This moment also requires scrutiny of the broader budgetary context in which the MFF is being negotiated. The growing reallocation of the EU budget towards militarisation risks reducing funding for climate, civic space and democratic infrastructure. At the same time, all MFF spending should comply with the **Do No Significant Harm (DNSH) principle**. The

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European Commission has recently published a proposal on applying DNSH to the next MFF and launched a targeted consultation and a survey open until 16 September. D4T encourages coalition members and stakeholders to contribute to this process.

D4T's principal concerns include that:

- Climate objectives are structurally embedded across the proposed MFF architecture, while democracy and democratic governance safeguards are not
- Increased flexibility risks weakening democratic, social and environmental safeguards
- The NRPP structure risks reducing multilevel governance and participation to formalistic consultation processes
- Civic space, advocacy and long-term support for Civil Society Organizations (CSOs) risk being weakened under the new architecture
- The proposed MFF architecture does not sufficiently recognise or invest in Democratic Social Infrastructure(s) (DSI) that enable sustainable citizen participation, multilevel governance, civic capacity and democratic accountability throughout the transition process
- The disproportionate increase of the EU budget towards the military industry reduces funding for environmental and social objectives, without adequate transparency on the impacts and trade-offs involved
- The absence of robust Do No Significant Harm safeguards across all MFF instruments risks allowing climate-labelled funding to support activities that undermine environmental objectives

In this context, we call on the European Commission and the Council of the European Union to consider the following points as essential in building a democratic and resilient response to the challenges of climate change:

1. **Democratic governance at the heart** of all major climate-relevant MFF instruments, strengthening CSO participation, transparency and (corporate) accountability.
2. **Genuine multilevel co-governance within the NRPPs through a meaningful implementation of** the partnership principle rather than a symbolic and purely consultative process.
3. **Binding participation standards and Democratic Social Infrastructure**. This includes permanent participation mechanisms, civic networks, local democratic capacities and institutional arrangements, for CSOs, local and regional authorities, social partners and affected communities across the design, implementation and monitoring of climate transition funding.
4. **Durable local and regional democratic infrastructure**: civic hubs, community participation structures and intermediary organizations, that enable continuous engagement between public authorities, civil society and citizens in transition planning, implementation and oversight, beyond individual projects or consultation exercises.
5. **Safeguarded and ring-fenced funding** for democracy, civic space and participatory infrastructure across the MFF architecture, including through AgoraEU.

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6. **Adequate and structural support for CSOs**, including operating grants, dedicated technical assistance and capacity-building, and accessible long-term funding mechanisms for climate and democracy actors, including smaller municipalities and grassroots initiatives.
7. **Democratic, social and environmental safeguards** that are protected from being weakened through the increased flexibility within the MFF and that uphold the "leave no one behind" principle of the EGD.
8. **Strong democratic accountability and transparency mechanisms** within climate funding instruments, including participatory monitoring and public reporting requirements.
9. **Strong rule of law and conditionality mechanisms** that protect the civic space and democratic participation across all EU funding streams.
10. **Embed explicitly the 'Intergenerational Contract' provisions** (Fair Policymaking, Fair Opportunities, Fair Places) **of the Intergenerational Fairness Strategy** in the new MFF.
11. Rigorous application of the **Do No Significant Harm (DNSH)** principle across all MFF instruments.
12. Full **transparency** on the impacts by military spending on democracy funding, climate and social objectives.

D4T's core position is clear: **democratic governance is not a secondary accompaniment to climate policy**, but a necessary condition for a legitimate, socially just and politically sustainable transition.

We are happy to engage further on the issues identified in this letter - the annex gives details on each of the issues covered.

The undersigned CSOs,

Democratic Society,
The European Environmental Bureau,
Political Watch,
Environmental Justice Network Ireland
Eco-union
Jesuit European Social Centre (JESC)
Friends of the Earth Europe

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democratic
society

EEB
European
Environmental
Bureau

POLITICAL
WATCH

EJNI
ENVIRONMENTAL JUSTICE
NETWORK IRELAND

eco-union

JESC
Jesuit
European
Social
Centre

Friends of
the Earth
Europe

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Annex. Supporting Evidence and References

European Commission & EU Institutions. *The 2028-2034 EU budget for a stronger Europe.* Brussels: European Commission, 2025. https://commission.europa.eu/strategy-and-policy/eu-budget/long-term-eu-budget/eu-budget-2028-2034_en

European Commission. *Proposal for a COUNCIL REGULATION laying down the multiannual financial framework for the years 2028 to 2034.* Brussels: European Commission, July 2025.https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025PC0571

European Economic and Social Committee (EESC). *Multiannual financial framework 2028-2034*. Brussels: EESC, 2026. https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/multiannual-financial-framework-2028-2034

European Parliament. *INTERIM REPORT on the proposal for a Council regulation laying down the Multiannual Financial Framework for the years 2028 to 2034.* Brussels: European Parliament, 21 April 2026. https://www.europarl.europa.eu/doceo/document/A-10-2026-0105_EN.html

European Parliamentary Research Service (EPRS). *EU Long-Term Budget: European Parliament Adopts Interim Report Calling for a Significantly More Ambitious 2028–2034 Multiannual Financial Framework*. Brussels: European Parliamentary Research Service, 6 May 2026. https://epthinktank.eu/2026/05/06/eu-long-term-budget-european-parliament-adopts-interim-report-calling-for-a-significantly-more-ambitious-2028-2034-multiannual-financial-framework/

Democracy for Transition Coalition & Democratic Governance

Ohren, Arild. *Democracy for a World on Fire*. Democracy for Transition (D4T) White Paper Series #1, 2025. https://drive.google.com/file/d/1OvZjwjsPLy0a7elz88hxJ4ukCxy-RKJz/view

Smith, Graham. *Democratic Innovations: Designing Institutions for Citizen Participation*. Cambridge: Cambridge University Press, 2009.

Young, Iris Marion. *Inclusion and Democracy*. Oxford: Oxford University Press, 2000.

Civil Society, Civic Space & Democracy Funding

Civil Society Europe. *Civil Society Europe's Reaction to the Multiannual Financial Framework 2028-2034: Progress for Some, Setbacks for Others.* Brussels: Civil Society Europe, 2026. https://civilsocietyeurope.eu/cse-mff-reaction-2028-2034/

European Partnership for Democracy (EPD) et al. *Joint Recommendations: The European Union Rule of Law Report 2026*. Brussels, 2026.

Friedrich-Ebert-Stiftung (FES). *Policy Brief: Support for Democracy in the next MFF - The Role of Political Foundations.* Brussels: FES, 3 September 2025.https://brussels.fes.de/news/policy-brief-support-for-democracy-in-the-next-mff-the-role-of-political-foundations.html

Climate Governance, Just Transition & Environmental Funding

Alliance for Just Transition. *Key recommendations for INVESTING IN A JUST TRANSITION in the EU budget for 2028–2034.* Brussels: Alliance for Just Transition, April 2026. https://alliancejusttransition.eu/wp-content/uploads/2026/05/Rec-Investing-Just-Transitions-v5.pdf

European Environmental Bureau (EEB). *Safeguarding social justice in EU climate finance Unpacking the MFF–SCF link*. Brussels: EEB, 2026. https://eeb.org/wp-content/uploads/2026/02/MFF-Explainer-2.pdf

Heinrich Böll Foundation. *The 2028–2034 EU long-term budget: what's in it for climate? An MFF fit for purpose: Assessing Europe's long-term budget.* Brussels: Heinrich Böll Foundation, November 2025. https://eu.boell.org/en/2025/11/20/2028-2034-eu-long-term-budget-whats-it-climate

Territorial Governance & Multilevel Governance

Eurocities & Local Alliance. *Making the Next EU Budget Work for Cities and Regions: The Local Alliance's 10-Point Action Plan*. Brussels: Eurocities, October 2025. https://eurocities.eu/wp-content/uploads/2025/11/Local-Alliance-10-Point-Action-Plan-1.pdf

Additional Policy & Research Sources

European Policy Centre (EPC). *The proposal for the next Multiannual Financial Framework: A bold step towards more strategic investment*. Brussels: EPC, 16 July 2026. https://www.epc.eu/publication/the-proposal-for-the-next-multiannual-financial-framework-a-bold-step-towards-more-strategic-investment/

European Movement Ireland. *The 2028-2034 MFF negotiations – state of play.* Dublin: European Movement Ireland, 2026. https://www.europeanmovement.ie/the-2028-2034-mff-negotiations-state-of-play/

Federation for Innovation in Democracy (FIDE) & Alliance4Europe. *Democracy Funding in the Next EU Budget: A Strategic Necessity. Brussels: FIDE and Alliance4Europe*, May 2026. Recommendation 6.1, "Mainstream democracy funding beyond AgoraEU". https://drive.google.com/file/d/1GoRARWalh9gMZwcVVyTa1ioUK_V5uh0H/view?pli=1

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Liza Saris. *Funding democracy in the next MFF.* Discussion Paper, Transnationalisation Programme. Brussels: European Policy Centre (EPC), 29 June 2026. https://d1xp398qalq39s.cloudfront.net/uploads/ckeditor/2026/07/01/connecting-europe-dp-v3.pdf