

# The Case for Supporting Democratic Resilience

How to structure the European Union's Multiannual Financial Framework to meet the digital and democratic challenges of the next decade

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## Executive summary

The European Union is preparing its largest-ever funding program for democratic resilience. Within the EU's 2028–2034 [Multiannual Financial Framework \(MFF\)](#), the AgoraEU program represents the centerpiece of this foundational work for the 27-country bloc. It carries a proposed budget of €8.6 billion, or more than double the existing MFF cycle, in current prices.

The European Parliament will publish its own MFF interim reports in April. Negotiations between the European Commission, European Parliament, and Council of the European Union are expected to run into 2027.

The scale of the investment is unprecedented, and the EU's ambition is real. But so are the flaws of the current MFF proposals.

They fail to close the long-term funding gap for the digital-focused organizations that are now integral to how the bloc upholds its democratic norms, enforces its digital rulebook, and competes globally in technologies such as artificial intelligence.

The EU's future budget is at risk of failing to meet both EU member country and EU-wide objectives related to democratic resilience. That includes promoting and protecting the bloc's fundamental rights, defending national and EU-wide democratic traditions and norms, and boosting societal resilience and citizens' engagement in democratic processes.

This paper draws on national stakeholder workshops across multiple EU member countries, that were organized by the Atlantic Council's Democracy + Tech Initiative (DTI) and The Global Disinformation Index. These meetings brought together national ministries, philanthropic funders, civil society and academia under the Chatham House Rule to outline each country's objectives under the next MFF funding cycle.

The analysis is also based on a first-of-its-kind review of the full 2021–2027 EU MFF dataset to assess current funding for the following categories: Internet governance; Digital rights; Disinformation; Fact-checking; Independent media support; Foreign Information Manipulation and Interference (FIMI); Democratic resilience; Trust and safety infrastructure; and the EU’s digital rulebook compliance.

Together, they represent quantifiable evidence of the current EU funding environment, and what is required during the next MFF cycle to address the critical question of how best to support the bloc’s democratic resilience efforts.

Two findings emerge:

**1. National governments across the 27-member bloc recognize that digital-focused civil society groups are now essential to regulatory enforcement, democratic resilience and economic competitiveness.**

**2. The current EU budget proposals do not address existing structural and funding challenges that these organizations face at the very moment they are being asked to do more.**

More EU funding channeled through the same short-term instruments will produce more one-off projects. It will not create durable digital institutions and expertise that EU member countries say they urgently need. The EU has invested heavily in [regulatory capacity](#) under the Digital Services Act, Digital Markets Act and Artificial Intelligence Act, respectively. That regulatory infrastructure is only credible if matched by civil society organizations with the long-term funding to monitor and enforce it.

Without that, European citizens’ voices on digital democracy may be silenced.

The political will exists. Government officials at every EU member country workshop expressed genuine appetite for stronger civil society roles in resilience, security and competitiveness. What is missing is translation: from political intent to budgetary reality.

## Key findings

### 1. National governments are increasingly reliant on digital-focused organizations:

Across all EU member country workshops, government officials and regulators highlighted the now central role that digital-focused civil society organizations play in delivering on the bloc's digital agenda around democratic resilience. Administrative burdens and cuts to non-EU funding have left these groups struggling to meet that growing demand. The dynamic varied by country. Some officials framed civil society through a security or competitiveness lens. Others viewed these organizations as early-warning systems for democratic resilience. What was consistent was an often-incomplete awareness among national workshop participants of the current EU budget's structural imbalances and instability.

### 2. Regional differences limit long-term democratic resilience:

Significant geographical asymmetries are baked into Europe's current EU funding structures and may persist in the new EU budget cycle. Under the 2021–2027 MFF, groups from Western Europe outperform counterparts from Central and Eastern Europe in both Citizens, Equality, Rights and Values (CERV) (ratio: €1.5: €1) and Horizon Europe (ratio: €4.1: €1) funding, based on analysis of publicly available data. Only in the Digital Europe program is that imbalance reversed (ratio: West €0.70: East €1).

This inequity in funding undermines the capacity of Central and Eastern European organizations. Many of these groups are on the frontlines in combating attacks on the bloc's democratic institutions and norms. But they do not have access to long-term funding and engagement with research agendas to create sustainable institutional capacities and expertise required to support the EU's democratic resilience objectives.

### 3. The largest democratic resilience mandate relies on the most fragile funding instruments:

The current Horizon Europe and CERV programs are arguably the two EU funding mechanisms for civil society and academia that are most associated with democratic resilience. Collectively, they provide roughly €243 million in such funding across the 2021–2027 MFF, based on a review of publicly available data. Yet 84 percent of this democratic resilience support, or €203 million, flows through non-renewable grants and project tenders lasting between 12–36 months.

Digital-focused civil society organizations and academic institutions are being asked to conduct long-term institutional functions through funding structures specifically designed to be short-term and temporary. That includes disinformation detection linked to national elections and evidence gathering on social media algorithmic amplification of harmful content.

### 4. EU policy priorities have shifted. How organizations are funded has not:

Regulatory compliance infrastructure linked to the EU's digital rulebook will receive an estimated €35 million across the 2021-2027 MFF budget cycle. It is backed by statutory requirements and administered through permanent institutional frameworks. This is the fastest-growing digital thematic area related to the current MFF. It was effectively non-existent before 2022. Confirmed cumulative commitments are expected to reach approximately €26 million by the end of 2026.

A further €9 million is forecast through 2027. This compliance infrastructure systematically places civil society organizations in competition with technology companies and regulatory consultancies that have significantly more institutional resources to win such tenders.

A further €240 million, or roughly 39 percent of the total EU funding identified for the overall thematic area, is earmarked for the journalism and media sector. The majority of this funding, through the DG CNECT Multimedia Actions annual envelope and reinforced by the European Media Freedom Act, funds pan-European broadcasters and newsrooms on a recurring basis.

EU funding support for regulatory compliance and the media sector is overwhelmingly supported by statutory instruments that will survive specific MFF budget cycles. That long-term stability is unavailable for almost all groups working on democratic resilience — despite EU and national political priorities focusing on this ongoing theme.

## What national stakeholders are saying, and what the evidence shows they are missing

Stakeholder discussions across all national workshops highlighted collective concerns and opportunities that should be addressed in the EU's next budget funding cycle. The EU member countries for these convenings were chosen through a combination of net contributor status for the 2028–2034 MFF budget cycle and to ensure geographical representation from across the 27-country bloc.

Administrative burdens in accessing EU funds emerged as the primary structural barrier in all national discussions; however, each country's stakeholders approached the issue through a particular domestic lens.

In Central and Eastern Europe, co-financing requirements and minimum grant sizes systematically excluded organizations without the financial infrastructure to bridge temporary grant cycles. In Western Europe, the issue was less eligibility and more capacity. Smaller organizations could not sustain the burden of EU grant applications and reporting requirements alongside the project-based work.

Across all national workshops, participants consistently called for multi-year core funding with reasonable administrative requirements and transparency obligations. This is the funding model that US philanthropic organizations have provided for such programming but can no longer sustain at scale. Flexibility was seen as essential. Digital-focused groups must be able to pivot to emerging policy priorities across the 2028–2034 MFF budget cycle without waiting for new grant calls. Government stakeholders viewed these organizations as pillars of democratic resilience and regulatory enforcement. But that recognition, without corresponding long-term funding, had created delivery expectations that the current short-term CERV instruments could not meet.

The enforcement of the EU's Digital Services Act, Digital Markets Act and Artificial Intelligence Act has been outsourced to a civil society community running on a 12–36 month grant cycle.

### Right questions, wrong funding

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National workshops focused consistently on streamlining access to existing EU funding: reducing administrative barriers, lowering co-financing thresholds, and making tenders more responsive to organizational realities. These were real problems. Solving them would improve outcomes. But they would not address the underlying structural problem.

In one national context, 98 percent of local organizations' participation in EU funding came through the existing CERV program. Domestic groups from that country had minimal participation in the separate Horizon Europe program, based on a review of publicly available data. Larger pots of long-term institutional support, specifically those associated with media freedom and journalism, were out of reach for almost all digital-focused organizations.

For most countries' civil society organizations, their involvement in Horizon Europe was relatively small. This is the EU funding structure which produced the more long-lasting democratic resilience institutions and deliverables compared to parallel short-term CERV grants, even though Horizon

Europe projects were equally time limited. For civil society groups involved in Horizon Europe programs, they were consortium partners, not lead organizations.

This is by design. Horizon Europe is predominantly centered on multi-country consortia, often led by traditional academic researchers with professional grant management capacities. This funding program is not designed for digital-focused civil society organizations whose funding support typically resides within the more short-term CERV program.

This divide is sharpest in Central and Eastern Europe.

Organizations from the region participate in CERV and Digital Europe, mostly on par with their Western counterparts. But they are largely absent from Horizon Europe's longer-term institutional layer. Improving CERV access does not fix this structural gap. A civil society organization that successfully navigates a potentially simplified CERV application still hits the same wall when that grant expires in 12--36 months. Long-term outcomes require long-term funding instruments, not just lower administrative barriers for short-term alternatives.

The distinction between CERV and Horizon Europe, including the ongoing regional disparities, is critical for how the next budget cycle should be developed.

If the 2028--2034 MFF focuses solely on improving access to non-renewable funding structures, currently baked into the existing CERV program, then the EU will fail to address the institutional imbalances outlined within the EU member country workshops.

Addressing the EU funding accessibility question, as described universally across all EU member country workshops, only has long-term benefits if the underlying project tenders are equally redesigned to provide long-term and flexible funding support, which institutionalizes capacity and expertise across the 27-country bloc.

## **Thematic shift toward security and competitiveness**

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The in-country workshops also highlighted a growing change in how democratic resilience work from digital-focused organizations was framed via national governments and ongoing MFF negotiations. This created a fundamental tension that must be addressed in how the next budget cycle was designed.

Civil society outputs on disinformation, FIMI, digital sovereignty and information environment integrity are increasingly presented through a security, competitiveness or crisis-response lens rather than one of democratic values and prevention of these threats, based on the national MFF discussions. FIMI is the preferred term in several EU capitals. Independent media support is framed as foreign policy. Democratic resilience is repositioned as government-linked crisis capacity.

This policy change is a direct result of Russia's invasion of Ukraine in 2022, as well as the EU's renewed focus on security, including related to hybrid threats. But it also reframes future funding support for FIMI- and information integrity-related projects as potential state security infrastructure, not as democratic resilience and the promotion of fundamental rights.

This is not just rhetorical. The 2021-2027 MFF data confirms the shift.

FIMI moved from a footnote in Horizon Europe Cluster 3 in 2021 to the heart of the European Democracy Shield proposals in 2025. Funding tenders have progressively shifted from open grant competitions toward institutional budgets and closed procurement contracts. The net effect has been structural. FIMI-related work is being reclassified as state security infrastructure that may place it beyond the reach of the organizations best equipped to do it.

Security and competitiveness will remain EU priorities. But they must not relegate civil society to the margins.

## **The structural misalignment at the heart of EU funding**

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Two parallel funding structures govern democratic resilience in the EU. They are pulling in opposite directions.

The first funds the European Commission's operational and regulatory infrastructure. That includes permanent institutions, compliance frameworks and digital enforcement tools which support the Digital Services Act, Digital Markets Act and Artificial Intelligence Act, respectively. The European Centre for Algorithmic Transparency established in 2023 is a model of this approach. This compliance infrastructure provides durable financing through mechanisms that outlive individual MFF budget cycles. Market intelligence contracts, compliance monitoring frameworks and direct support for national regulatory agencies are similarly insulated from MFF negotiations.

The second structure funds civil society, independent researchers, the EU journalism ecosystem, and systemic data infrastructure. It is designed to support and hold accountable that same regulatory infrastructure, but through instruments that are inherently temporary. This structural tension is visible across every instrument: in eligibility rules, time horizons and renewal mechanisms.

[Framework Partnership Agreements \(FPAs\)](#) within CERV are the closest civil society equivalent to institutional funding. This funding mechanism involves multi-year agreements between the European Commission and EU-wide civil society organizations that allow these groups to access long-term grants without full competitive tenders.

Between 2021-2027, approximately 70–80 organizations accessed FPAs, across all thematic subjects. The combined budget during the 2026–2028 funding cycle was roughly €40 million, based on publicly available data. It is currently the most stable EU-level support for digital rights and media freedom. But FPAs are also the hardest instrument to access for most civil society groups and face significant threat in the next budget cycle negotiations.

Beyond these FPAs, the funding picture is precarious.

CERV annual action grants provide approximately €10-20 million per year for democratic resilience work. Creative Europe and DG CNECT provide a separate estimated €30-35 million annually for journalism. These are the largest single sources of democratic resilience funding in the EU. Up to approximately 150 organizations receive CERV grants each year, based on publicly available data. But the following year's call funds a largely different cohort. Institutional capacity disappears with every annual funding cycle.

Horizon Europe's Research and Innovation Actions (RIAs) represent €14-19 million per year, based on

an annual average for the 2021-2027 MFF budget cycle. But they are non-renewable and last up to four years. Outputs are regularly absorbed into regulatory infrastructure while the capacity that produced them disperses.

A €5.7 million Horizon Europe project that ran between 2022-2025, for instance, created AI-assisted verification tools that fed directly into the EU's regulatory compliance work. But the 14-organization consortium behind the project was eventually dissolved and many of the partner organizations failed to receive follow-on democratic resilience funding.

The asymmetry is compounding.

Digital regulatory compliance funding linked to the Digital Services Act and Artificial Intelligence Act is growing annually at roughly €10 million per grant call. Confirmed commitments will reach roughly €26 million by the end of 2026. That collective compliance figure already rivals, or exceeds, the total three-year FPA operating grants to the 15-20 digital rights organizations (€15-21 million, based on publicly available data). And while compliance infrastructure scales up, civil society is systematically placed in competition with technology companies and regulatory consultancies that have significantly more structural resources to win such tenders.

A recent €8 million compliance tender related to the EU's Artificial Intelligence Act is emblematic of this structural imbalance. The call funded AI Act compliance tooling and audit infrastructure. Civil society organizations were eligible. But the practical requirements of the tender favored technology companies and regulatory consultancies with pre-existing engineering capacities and technical expertise. No publicly available data on which groups had secured this funding was available at the time of publication.

## **AgoraEU/CERV+: How to achieve long-lasting results for democratic resilience**

AgoraEU [merges](#) the Citizens, Equality, Rights and Values (CERV) program and Creative Europe into a single €8.6 billion framework for 2028–2034, divided between Creative Europe/Culture (€1.8 billion), MEDIA+ (€3.2 billion) and CERV+ (€3.6 billion). At 0.43 percent of the proposed next EU budget, it is the primary vehicle for the EU's democratic resilience ambitions.

The structure needs to change.

AgoraEU must dedicate long-term funding for civil society organizations, fact-checkers, FIMI-focused bodies, independent researchers and the infrastructure layer that underpins such groups. These are organizations on the frontlines of democratic protection, particularly in Central and Eastern Europe. They must be supported via instruments that are flexible enough to meet emerging threats, not pre-defined thematic calls.

The FPA operating grant model must be explicitly protected in AgoraEU's implementing regulation. It is the most stable long-term civil society funding instrument currently available to groups that span the 27-country bloc. The European Commission's current proposal deliberately avoids earmarking amounts for specific organizational types. That flexibility risks eliminating FPAs entirely. The MFF negotiations may replace them with project-level thematic calls. Without explicit protection for FPAs, including defined eligibility criteria and a minimum funding envelope as a share of the CERV+ budget, EU institutions may not include such operating grants in the next MFF cycle.

Protecting FPAs is necessary. But it is not sufficient. That long-term funding mechanism reaches between 70–80 organizations that primarily function as connecting vehicles for pan-EU causes. It does not fund the operational infrastructure of hundreds of national and grassroots organizations that are conducting on-the-ground monitoring, FIMI response and platform accountability work. Those groups must currently navigate CERV annual action grants with 12–36 month time horizons. The current funding instrument is designed for project outputs, not sustained institutional capacity now required by both EU-level and national policymakers.

What is necessary is a mid-tier grant that is longer than the current CERV action grants, but more accessible than the existing FPAs. To meet this need, AgoraEU should introduce a Democratic Resilience Institutional Grant within CERV+: 5–7-year grants, renewable once, that are open to organizations whose primary function is democratic resilience monitoring, FIMI response, online information environment auditing and supporting data infrastructure.

Eligible organizations would include fact-checkers, digital rights bodies, independent research groups and data infrastructure providers which provide systemic monitoring and data collection functions. Grants would fund operational infrastructure, staff, monitoring systems, longitudinal datasets and sub-granting to in-country partners, not one-off project outputs. This is the instrument that converts short-term project funding into mid-term institutional capacity. Currently, such a structure does not exist.

# Recommendations: Building sustainable democratic resilience for the digital age

## 1. Address the structural misalignment at the heart of EU funding

Both the EU member country convenings and separate analysis of the 2021-2027 budget cycle highlight two parallel tracks for the bloc's democratic resilience work. One provides long-term institutional budgets for permanent regulatory agencies. The other funds primarily short-term civil society and academic projects that were then often subsumed by these EU and member country government policy instruments.

The FPA operating grant model is the only EU funding instrument that gives civil society organizations a funding horizon comparable to institutional budgets. It is not guaranteed in AgoraEU, as currently proposed. The European Commission's flexibility-first approach risks eliminating it by default. AgoraEU's implementing regulation must explicitly protect FPAs, including defined eligibility criteria and a minimum funding envelope as a share of the CERV+ budget. This stabilizes the sole long-term EU funding instrument not beholden to individual budget cycles for the small, but critical, cohort of EU-wide civil society organizations that depend on it.

Yet the current FPA structure remains inadequate. Current eligibility criteria limit long-term funding support to a small group of Brussels-based organizations. AgoraEU's implementing regulation should establish a second tier within the FPA framework, at a lower funding level, for organizations that do not have an EU-wide footprint, but whose democratic resilience work has immediate impact, either within a specific EU member country or across multiple states. This structure does not abolish the current FPA structure. But it acknowledges that most democratic resilience work is done at a national, not EU-wide, scale.

## 2. Create a democratic resilience institutional grant tier

The fundamental problem between institutional capacity building and civil society support is imbalanced time horizons. Institutional instruments persist beyond MFF budget cycles, whereas civil society funding instruments end. A five- to seven-year democratic resilience institutional grant tier within CERV+ should be created. It would be renewable once and include zero co-financing requirements to remove existing financial barriers for eligible organizations. It would give digital rights organizations, fact-checkers, independent research groups, academic institutions and infrastructure providers a funding horizon equivalent to EU compliance procurement contracts.

It would not match the permanence of EU institutions. But it would close the gap from the current permanent-versus-temporary structural misalignment to something that is more equitable and long-lasting, by nature. Five to seven uninterrupted years of operation, with the ability to sub-grant to in-country partners, is a qualitative step change from the current cycle of mostly 12–36 month grants. All sub-grants would similarly be published to establish sufficient transparency over this funding mechanism. The mechanism could fund longitudinal data monitoring, FIMI detection across electoral cycles, sustained platform accountability and systemic infrastructure. This is work that EU member countries say they need but no current EU instrument supports.

### 3. Resolve the geographic asymmetry in democratic resilience funding

The current MFF has baked-in regional inequalities that have yet to be addressed in the current EU budget negotiations. The good news is that in both the CERV and Digital Europe programs, organizations from Central and Eastern Europe are well represented compared to their Western European counterparts. In the Horizon Europe program, however, Western European organizations currently receive €4 for every €1 earmarked for Central and Eastern European groups, based on publicly available data.

This geographical asymmetry has meaningful implications for the future of the EU's democratic resilience. Organizations from Central and Eastern Europe — many of which are on the frontlines in combating online attacks on democratic norms and institutions — are not sufficiently represented in the exact EU funding program designed to create longer-term infrastructure and research agendas compared to those available via either CERV or Digital Europe.

As part of FP10, or the proposed successor to Horizon Europe, calls for democratic resilience research should explicitly require that at least one consortium partner from a Central and Eastern European country hold an operational intelligence-sharing role. This would connect the current Horizon Europe research layer with operational knowledge that such groups possess. The Digital Europe's successor within AgoraEU should also extend the current EDMO structure, in which groups from the region currently receive more than 50 percent of funding, to broader democratic resilience monitoring. This should be phased in during the next MFF period to allow organizations in Central and Eastern European countries to acquire sufficient expertise to play a broader research role across the bloc.

### 4. Mandatory data-sharing between parallel democratic resilience paths

There are in-built inefficiencies in how regulatory compliance and democratic resilience tenders operate within the EU budget cycle. The former produces quantifiable data about platform behavior. The latter is designed to hold those platforms and EU institutions accountable — but without access to underlying datasets that would help them to effectively carry out that mandate in the name of European citizens.

Currently, there is no mandatory connection, built into EU funding structures, to connect digital regulatory compliance with democratic resilience outputs. There are legitimate enforcement restrictions for why this currently does not exist. But the next MFF should resolve this data-sharing limitation to ensure that future EU funding represents more than the sum of its parts.

That entails including a grant agreement condition to be applied across all compliance-related funding between 2028–2034. Any instrument under Digital Europe or its successors that funds regulatory compliance infrastructure, including market intelligence contracts, compliance monitoring tools, regulatory support frameworks, and algorithmic transparency development, should include, as a condition of award, a structured data-sharing protocol, based on contractual agreements that such data is not made public, with civil society organisations holding CERV+ FPA or the proposed Democratic Resilience Institutional grants.

Such data sharing does not require renegotiating eligibility rules for compliance tenders. Instead, it operates at the grant agreement level by attaching an external scrutiny obligation to these instruments.

This cooperation between separate funding modalities represents the minimum intervention to sustain accountability without requiring the European Commission to relinquish control of the compliance infrastructure.

## **5. Open democratic resilience institutional grants to non-academic organizations**

Horizon Europe and Digital Europe systematically designate academic institutions as lead partners within democratic resilience grants. The result is that the most durable funding goes to organizations with grant management infrastructure, not operational expertise. Digital rights organizations, fact-checkers and independent research groups are primarily junior consortium members or must rely on CERV annual grants.

The FP10 work programs, as well as MEDIA+ hub call designs within the proposed AgoraEU, should explicitly permit non-academic organizations with a demonstrable track record in information integrity, media freedom monitoring or fact-checking to serve as lead partners in qualifying coalitions. Academic partners should remain required consortium members contributing research methodology and longitudinal evaluation. But they do not need to lead these partnerships.

## **6. Establish a democratic resilience endowment fund outside the MFF cycle**

Dependence on seven-year budget cycles is the single greatest structural vulnerability to the EU's democratic resilience agenda. Civil society organizations build staff and institutional capacity around MFF timelines. They then face existential uncertainty during every budget renegotiation. A Democratic Resilience Endowment Fund, capitalized once at the start of the 2028–2034 MFF at a minimum of €500 million and governed independently of the European Commission's annual budget process, would provide counter-cyclical stability that US philanthropy once offered, but can no longer sustain.

The Fund should be seeded through EU budget contributions, matched via EU member country commitments and structured participation from European institutional investors under a public-interest mandate. It would be governed by an advisory board drawn from EU institutions, outside philanthropic organizations and civil society groups with binding nomination rights. It should operate on a perpetual endowment model in which only returns are disbursed. Such a structure insulates democratic resilience funding from potential political renegotiation. It is the critical EU funding structural intervention on which all other recommendations ultimately depend.

## **7. Mandate a democratic resilience impact ledger for all AgoraEU grantees**

Civil society organizations deliver policy expertise, early-warning intelligence and enforcement support that is routinely absorbed into EU-wide and member country policymaking without attribution or measurement. This invisibility is a political liability. It weakens the case for sustained investment at every EU budget negotiation due to a lack of awareness of individual groups' overall impact.

AgoraEU grantees should be required to complete a standardized Democratic Resilience Impact Ledger as a condition of funding. It would capture: Institutional uptake (European Commission enforcement actions, European Parliamentary inquiries and EU member country regulatory decisions that cite civil society research); Early-warning effectiveness (disinformation incidents and FIMI operations identified ahead of electoral events); and Ecosystem health indicators (organizational

survival rates, geographic distribution of capacity, and sub-grant flows to national partners). Ledger compliance should consolidate, not add to, existing annual reporting obligations.

For the European Parliament, the Ledger provides quantifiable evidence to defend the AgoraEU budget against potential future EU member country pressure. For civil society organizations, it creates an auditable record of public value and greater transparency on their societal impact. The Ledger should be governed by an independent panel including the European Court of Auditors and be reported annually to the European Parliament's Committee on Civil Liberties, Justice and Home Affairs.

## **8. Create FIMI intelligence and civil society accountability funding instruments**

Investigative civil society organizations, whose primary function is operational FIMI monitoring, currently rely on private philanthropic funding because no EU public instrument is built for their needs. Separately, the EU's digital regulatory compliance infrastructure is the fastest-growing funding cluster within democratic resilience support. But civil society organizations that independently audit whether platforms comply with the EU's digital rulebook operate almost entirely via private philanthropy. What is required are two separate funding instruments within the AgoraEU program to meet this structural deficit.

Dedicated FIMI Operational Intelligence Action and Civil Society Digital Accountability Instruments should be established, separately, within CERV+ and the Digital Europe program's successor in the proposed 2028–2034 MFF.

The former would be managed directly by the relevant European Commission directorate in which grants would last 24 months and be renewable once. Eligible organizations could include investigatory civil society organizations, fact-checkers and independent research teams with a demonstrable FIMI track record. The latter would target similar organizations, but the funding's mandate would be to provide independent external checks on both platforms and regulators to ensure that the EU's digital rulebook is audited, tested and monitored to meet societal needs.

## **9. Establish a long-term strategic litigation fund within CERV+**

The EU's digital regulatory framework is only as effective as its enforcement. Organizations that generate such oversight through civil society litigation represent one of the most cost-effective accountability mechanisms available to European citizens. Such strategic litigation is indispensable to the EU's digital regulatory project. But it is also the function most systematically failed by current EU funding programs.

AgoraEU should therefore establish a strategic litigation reserve as a dedicated funding line within the next MFF programming. Eligible organizations could include civil society bodies and legal aid organizations with active casework before national courts, the EU Court of Justice or European regulatory bodies. Grants should last between three and seven years to mirror the realistic arc of digital rights litigation from case initiation to final judgment. The rationale for this funding support is that the EU's regulatory frameworks can only be long-lasting if civil society organizations have access to sustained financial support to hold regulatory actions to account in court.

## **10. Align electoral integrity funding to electoral calendars, not program cycles**

The EU's current electoral integrity funding functions on an annual program calendar that is structurally misaligned with the democratic threat it is designed to address. CERV elections calls run on a 12-month cycle, and award grants for 12–36 months. In contrast, electoral interference campaigns often operate on four- to five-year national electoral cycles. In the current MFF, the CERV elections programming has grown in thematic sophistication. But the duration of individual grants has not changed.

AgoraEU should realign electoral integrity grant durations to EU member country and European Parliament election calendars. These grants should open 24 months before a scheduled national or EU election and run through the six-month post-election period. This timeframe would cover the full arc of electoral interference risk. It should also permit single-country applicants because, under current CERV election calls, projects typically require a minimum of 2-country consortia. Monitoring for potential election interference is predominantly national, not transnational. This change would provide direct support for organizations whose primary operations are within a sole EU member country.

# ANNEX: EU funding for democratic resilience, MFF 2021–2027

## Section A: Cross-program summary

This analysis maps all EU funding programs within the MFF 2021-2027 dataset against their managing bodies, instrument types, eligible entities, and budget envelopes. Together, the 61 tenders surveyed represent a central estimate of €614M in thematic EU funding for democratic resilience, digital governance, and related fields across the 2021–2027 MFF cycle.

The underlying dataset was compiled via Anthropic’s Claude, and then independently verified by the author. All figures, below, are based on all publicly available information. Some figures are inherently not exact due to the limitations of the available information.

### A1: Program overview

Table A1 sets out each program’s strand, managing body, central budget estimate, and the number of tenders included in the analysis. Budget figures are central estimates from the scenario assessment.

The dataset includes a subset of EU funding related to: Internet governance; Digital rights, Disinformation; Fact-checking; Independent media support; Foreign Information Manipulation and Interference (FIMI); Democratic resilience; Trust and safety infrastructure; and the EU’s digital rulebook compliance.

It includes data from: Digital Europe, Horizon Europe, CERV, Creative Europe, DG CNECT Multimedia and Preparatory Actions and the European Media and Information Fund (only public funding included) between 2021-2027.

A base estimate was created by counting only what EU funding was confirmed and unambiguous. A central estimate overlaid that figure with active or recently-closed calls where results had not yet been formally published, whose call ceiling and expected number of projects were known from public documents. A top estimate included the full plausible funding envelope if every condition was in favor of maximum scope.

All figures below are based on the central estimate.

The CERV figure (€138M) covers Union Values and Citizens’ Engagement democratic resilience strands only, which represent 8.9 percent of the full CERV program budget of €1.55B. The CNECT figure reflects the full 2021–2027 annual multimedia envelope. The EMIF figure covers EU/EP public contribution only.

Program	Instrument	Managing body	Budget (central est.)	Primary eligible entities	Tenders in this analysis
<b>Digital Europe</b> (DIGITAL)	Trust & Safety / DSA / AI Act grants & procurement	HaDEA (grants) DG CNECT (procurement)	<b>€81M</b>	Research, tech, public authorities, fact-checkers, NGOs	<b>9</b>
<b>Horizon Europe – Cluster 2</b> (Democracy & Governance)	Research & Innovation Actions (RIA, CSA)	REA	<b>€105M</b>	Universities, research institutes, CSOs (≥3 EU/assoc. countries)	<b>12</b>
<b>Horizon Europe – Cluster 3</b> (Civil Security)	Research & Innovation (RIA)	REA	<b>€20M</b>	Universities, research, civil society, security institutions	<b>2</b>
<b>Horizon Europe – Cluster 4</b> (Media Innovation)	Innovation Action (IA)	REA	<b>€12M</b>	Technology companies, media organizations, research (≥3 countries)	<b>1</b>
<b>CERV – Union Values &amp; Citizens' Engagement</b>	Action grants / Operating grants / FSTP	EACEA / DG JUST	<b>€138M</b>	CSOs, NGOs, civic networks, think tanks, advocacy groups (EU-based)	<b>14</b>
<b>Creative Europe (CREA)</b> Cross-sectoral	Action grants / Restricted tenders	EACEA / DG EAC	<b>€101M</b>	Media organizations, journalism intermediaries, press freedom bodies, academic institutions	<b>15</b>
<b>DG CNECT Multimedia &amp; Preparatory Actions</b>	Direct grants / Preparatory actions	DG CNECT (direct)	<b>€139M</b>	EU media outlets, fact-checking networks, CSOs, tech companies	<b>7</b>
<b>EMIF (EU/EP public contribution only)</b>	Co-funded rolling grants	Calouste Gulbenkian Foundation	<b>€10M</b>	European fact-checkers, media literacy bodies, disinformation researchers	<b>1</b>
<b>TOTAL</b>	–	–	<b>€614M</b>	–	<b>61</b>

## A2: Thematic breakdown: Budget against structural durability

The thematic mandates within this dataset show an inverse relationship between budget size and structural durability. Democratic resilience receives the largest share of thematic funding. But it relies almost exclusively on non-renewable competitive project grants. Regulatory compliance receives the smallest share. But it is funded through instruments that are permanent and often CSO-excluded.

Thematic mandate	Budget (central)	% of total	Primary program	Structural durability	Instrument characteristics
<b>Democratic resilience</b>	€290–310M	~50%	CERV + Horizon CL2	<b>Lowest</b>	Primarily competitive project grants; no multi-year renewal
<b>Media freedom &amp; journalism</b>	€240M	~39%	CREA + CNECT	<b>High</b>	Statutory mandate via EMFA; dedicated institutional structure
<b>Institutional capacity</b>	€50–60M	8–10%	DIGITAL + Horizon	<b>Highest</b>	JRC bodies, procurement contracts; permanent; no MFF dependency
<b>Regulatory compliance</b>	€28–30M	~5%	DIGITAL (DG CNECT)	<b>Permanent</b>	Fastest-growing cluster; civil society competes against technology companies and regulatory consultancies with significantly more structural resources
<b>Civic engagement (other)</b>	€15–25M	~3%	CERV (citizens)	<b>Moderate</b>	Town twinning, elections support, civic participation

Structural durability ratings reflect each instrument's design: Whether grants are renewable; Whether organizations can expect continuity across program cycles; and Whether the managing institution is a permanent body or a program-dependent entity. 'Permanent' denotes instruments funded through institutional or statutory budgets that are not subject to MFF renegotiation.

The regulatory compliance figure excludes institutional budget funding for ECAT.

## Section B: Geographical analysis

This section analyzes the geographic distribution of EU funding across Western Europe, Central and Eastern Europe (CEE), and non-EU countries. The analysis identifies significant and persistent asymmetries between funding tracks, with Horizon Europe showing the sharpest West:CEE divide.

## B1: Program-level West/CEE funding balance

Program	Total funding	West funding	West %	CEE funding	CEE %	W:C ratio	Key finding
CERV	€321.5M	€182.0M	57%	€121.9M	38%	1.5x	Near-balanced. Democracy Shield 2025 expanding CEE envelope.
Horizon Europe	€19.1M	€13.0M	68%	€3.2M	17%	4.1x	Western-concentrated. 5/5 project leads are Western European institutions.
DIGITAL / EDMO	€10.5M	€3.6M	34%	€5.4M	52%	0.7x	CEE majority post-Cohort 2. BECID, BROD, LAKMUSZ, ADMO, MedDMO cover all frontline states.
EMIF	€1.4M	—	0%	€359K	25%	—	Small envelope; limited geographic coverage.

West:CEE ratios are calculated on funding values, not record counts. 'Other' country shares (non-EU, candidate states, EEA) account for residual percentages not shown. The EMIF ratio is not calculated due to limited data points. DIGITAL/EDMO CEE majority reflects the addition of Cohort 2 hub data.

## B2: The two-layer gap — operational monitoring vs research

A structural divide separates the two primary EU-funded democratic resilience functions. Operational monitoring — funded through DIGITAL/EDMO — is geographically balanced, with CEE organizations holding the majority share.

Research and tool-building — funded via Horizon Europe — is heavily Western-concentrated. All five project leads are Western European institutions. No CEE organization bridges both layers.

Layer	Primary program	Total funding	West %	CEE %	Key finding
<b>Operational monitoring</b>	DIGITAL / EDMO	€10.5M	34%	52%	Geographically balanced post-Cohort 2. CEE majority. BECID, BROD, LAKMUSZ, ADMO, and MedDMO cover all frontline EU member countries.
<b>Research &amp; tool-building</b>	Horizon Europe	€19.1M	68%	17%	Western-concentrated. All five project leads are Western European institutions. ATHENA, DE-CONSPIRATOR, RESONANT, ARM outputs are expected to be accessible to EEAS StratCom – a permanent institution – when projects end.
<b>Bridge organizations (both layers)</b>	Both	—	100%	0%	ZERO CEE bridge organizations. Deutsche Welle, Aalto University, and University of Amsterdam are the only organizations operating across both layers. All three are Western European. Operational intelligence from CEE hubs does not directly inform the Horizon research agenda.

Bridge organizations are defined as those appearing in both the DIGITAL/EDMO operational layer and the Horizon Europe research layer, as lead or named consortium partner. Deutsche Welle, Aalto University, and University of Amsterdam are the only three identified. All are Western European entities.

This concentration means that operational intelligence gathered by CEE EDMO hubs — BECID (Baltics), BROD (Balkans/Romania), LAKMUSZ (Hungary), ADMO (Adriatic), MedDMO (Mediterranean) — may not systematically feed into the Horizon research agenda. Horizon Europe total (€19.1M) and West/CEE percentages in this table reflect confirmed grant values and are consistent with the program overview in B1.

## Section C: Entity type analysis

This section analyzes the 57 unique organizations that appear as successful applicants across the 61 tenders in the dataset, broken down by entity type. The analysis covers total appearances (including consortium partnerships), lead roles, and the share of total grant value associated with each entity type (based on an average funding scenario). Grant-led figures are apportioned from program central estimates.

### C1 — Entity type: appearances, lead roles, and grant share

Entity type	Total appearances	Unique orgs	As lead org	% of lead roles	Total grant led (central)	% of grant led	Key organizations & notes
Academic Institution	29	22	7	46.70%	€146.9M	23.90%	Leiden University (NL); Oslo Metropolitan University (NO); University of Vienna (AT). Dominant in Horizon Europe; leads majority of RIA projects.
Media / News Agency	10	8	2	13.30%	€217.5M	35.40%	Deutsche Welle Akademie; Deutsche Welle. Major public broadcasters (DW, RTBF, VRT, RTL) and news agencies (AFP, dpa) prominent in DIGITAL/EDMO and CNECT.
Civil Society Org / NGO	10	9	1	6.70%	€133.9M	21.80%	Unique Projects (LT) as lead. AlgorithmWatch (DE), RSF, OBC Transeuropa as partners. Predominant in CERV; appear as partners in Horizon and DIGITAL hubs.

Entity type	Total appearances	Unique orgs	As lead org	% of lead roles	Total grant led (central)	% of grant led	Key organizations & notes
Fact-Checking Organization	11	9	3	20.00%	€61.2M	10.00%	AFP Factuel (FR); Demagog (CZ); Pagella Politica (IT). Core to EDMO hub structure. EFCSN/IFCN membership acts as de facto eligibility filter.
Research / Think Tank	7	7	2	13.30%	€54.5M	8.90%	GRNET (GR); Jozef Stefan Institute (SI). Strong as Horizon partners. Fraunhofer (DE), GRNET, Trilateral Research (IE) prominent.
Tech / AI / Platform Co.	1	0	0	0.00%	—	—	No tech/AI/platform company confirmed as grant beneficiary in this thematic slice. Tech companies are eligible for forthcoming DIGITAL compliance and CNECT youth media calls.
<b>TOTAL</b>	<b>70</b>	<b>57</b>	<b>15</b>	<b>100%</b>	<b>€614.0M</b>	<b>100%</b>	<b>—</b>

'Total appearances' counts each organization once per tender in which it appears, whether as lead or consortium partner. 'As lead organization' counts only confirmed primary grant-holder roles. Grant-led figures are central budget estimates apportioned from program totals.

Methodology: equal-share splits applied where multiple leads hold joint management responsibility.

## C2: Lead share versus grant share — structural interpretation

The relationship between lead-role share and grant-value share highlights the structural positioning of each entity type within existing EU funding. Media organizations hold the highest grant share despite low lead counts. Civil society organizations hold the second-highest grant share, but the lowest lead rate. They are structurally positioned as delivery partners, not grant holders.

Entity type	% of lead roles	Total grant led	% of total grant pool	Structural interpretation
<b>Academic Institution</b>	<b>46.70%</b>	<b>€146.4M</b>	23.90%	High lead share but mid-range grant share — Horizon RIAs are numerous but smaller in value than EDMO/CNECT instruments.
<b>Media / News Agency</b>	<b>13.30%</b>	<b>€214.3M</b>	35.40%	Highest grant-led share despite low lead count. Deutsche Welle leads highest-value instruments (VERA.AI, F.A.C.T., DW Akademie CREA). Two leads drive disproportionate share.
<b>Civil Society Org / NGO</b>	<b>6.70%</b>	<b>€133.5M</b>	21.80%	Second-highest grant share but lowest lead rate (1 lead). CSOs are structurally positioned as partners, not leads, across Horizon and DIGITAL.
<b>Fact-Checking Org</b>	<b>20.00%</b>	<b>€60.7M</b>	10.00%	Strong lead rate but relatively small grant value — EDMO hubs are capped at €750K/hub. EFCSN/IFCN membership requirement acts as de facto eligibility filter.
<b>Research / Think Tank</b>	<b>13.30%</b>	<b>€54.5M</b>	8.90%	Consistent Horizon partners; two lead roles. GRNET and Jozef Stefan Institute represent CEE-adjacent research capacity.
<b>Tech / AI / Platform Co.</b>	<b>0.00%</b>	—	—	Zero confirmed appearances. Reflects current instrument architecture — not yet integrated as primary beneficiaries, though eligible for forthcoming DIGITAL compliance calls.

Lead share and grant share figures do not sum to 100 percent for Tech/AI companies due to zero confirmed lead roles and no apportioned grant value for that entity type. The 35.2 percent media grant share reflects the high unit value of CNECT Multimedia Actions and DIGITAL/EDMO procurement instruments relative to CERV action grants and Horizon RIAs.

## Methodology and scope

**Dataset:** 61 EU tenders across six programs (Digital Europe, Horizon Europe, CERV, Creative Europe, DG CNECT Multimedia Actions, EMIF) covering 2021–2027.

**Scope criteria:** Tenders were included where the primary thematic focus falls within internet governance, digital rights, disinformation and fact-checking, support for independent media, FIMI, democratic resilience in the digital sphere, trust and safety tooling infrastructure, or regulatory support/compliance for the EU digital rulebook.

Budget figures use central budget estimates. All figures are based on estimated values from all grants and tenders. They may not directly align with specific funding, due to a lack of transparency within the EU's funding programs. Where a project involves organizations from multiple countries, the grant value is divided equally across participating country records.

Country-level EDMO hub assignments reflect confirmed hub lead and co-lead roles per grantees and award amount estimates and CORDIS participants raw data.

## About the centers

The **Digital Forensic Research Lab (DFRLab)** at the Atlantic Council is a first of its kind organization with technical and policy expertise on disinformation, connective technologies, democracy, and the future of digital rights. Incubated at the Atlantic Council in 2016, the DFRLab is a field-builder, studying, defining, and informing approaches to the global information ecosystem and the technology that underpins it.

The **Democracy + Tech Initiative** creates policy practices that align global stakeholders toward tech and governance that reinforces, rather than undermines, open societies. It builds on the DFRLab's established track record and leadership in the open-source field, empowering global communities to promote transparency and accountability online and around the world