



Council of the European Union
General Secretariat

Brussels, 12 December 2025

WK 17133/2025 INIT

LIMITE

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
N° Cion doc.:	11771/25
Subject:	Proposal for a Regulation of the European Parliament and of the Council establishing the 'AgoraEU' programme for the period 2028-2034, and repealing Regulations (EU) 2021/692 and (EU) 2021/818 - Comments from delegations

Following the call for comments on the above proposal set out with WK 16016/2025 INIT, delegations will find attached comments from: AT, BE, CZ, DE, EL, FI, FR, HR, IE, IT, LV, NL, PL, RO, SI and SK.

WK 17133/2025 INIT

LIMITE

EN

AgoraEU proposal – template for the fifth consultation

From: RO, PL, LV, IT, IE, HR, FR, FI, EL, DE, CZ, BE, AT, HU, NL, SK, SI

Deadline: *11 December 2025 (18:00)*

Updated: 12/12/2025 09:56

Guidelines to be followed

Please kindly provide your contributions in the table below.

In this consultation, you are invited to contribute with drafting suggestions, comments or both.

To make drafting suggestions, copy-paste the text you wish to modify in the ‘Drafting suggestions’ column, on the same row as the original text. You may use track changes or formatting (for example **bold** for additions and ~~strike through~~ for deletions). Track changes can only be activated when your cursor is in the ‘Drafting suggestions’ or ‘Comments’ columns. To activate them, choose the setting Review – Track changes – Just mine.

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows or columns can be added or deleted**.

New provisions may only be added in any of the existing cells.

Thank you for your cooperation!

Commission proposal	Drafting suggestions and Comments
General Comments	PL (Comments): 1. Potential applicants need a clear description of actions, perhaps as an annex to the programme. Otherwise - existence of an only programme with so many objectives, target groups, calls, shall not lead to a simplification from the applicants’ and beneficiaries point of view, on the contrary it will be more difficult for them to identify the adequate call for their needs. All funded actions and projects by the new proposed umbrella Programme AgoraEU should contain clear indicators, short and long-term ones - quantitative but also qualitative, through extensive research after the implementation of the funded actions. In this way, a very much needed evidence base can be formed for all the funded sectors. 2. MANAGEMENT: We are concerned about the absence of the role of Member States in managing and monitoring the programme's implementation How the

Commission proposal	Drafting suggestions and Comments
	<p>programme will be managed including the role of Member States in the supervision of its implementation and that this information is appropriately reflected in the proposal? We would like the relevant authorities of the Member States to be substantively involved in the governance of the programme, developing and implementation of the programme work programmes, as the sectoral MS expertise will ensure the programme efficiency and most adequately addressing the sectors needs.</p> <p>LV (Comments):</p> <p>Latvia welcomes the continuation of targeted support for the audiovisual sector, civil society, cultural and creative industries in the next Multiannual Financial Framework for the period 2028–2034, by improving existing support instruments and increasing the budget. Therefore, Latvia overall supports the proposed “AgoraEU” regulation.</p> <p>Latvia appreciates the intention to create synergies between different policy strands but emphasizes the importance of ensuring the visibility and autonomy of the cultural and creative sectors, as well as the audiovisual sector. It is essential that the specific nature of these sectors is taken into account and appropriately reflected in the structure of the proposed new program. Therefore, Latvia calls on the European Commission to carefully assess and consider developing an annex to the proposed “AgoraEU” Regulation to provide a clearer description of the measures supported under each strand of the “AgoraEU” programme.</p> <p>Latvia is pleased about the Commission’s proposal to significantly increase funding across all strands of the “AgoraEU” programme. We consider the proposed funding justified, given the growing challenges in the relevant policy areas, including global competition, as well as the urgent need to strengthen democratic and societal resilience against disinformation and hybrid threats. It is important to provide more effective support to civil society</p>

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	<p>organizations, cultural and creative sectors. Increased funding in the new period is a prerequisite for supporting a larger number of cooperation projects submitted by organizations of various sizes and ensuring better geographical balance in the selection of supported projects.</p> <p>Since Russia’s full-scale invasion of Ukraine, European democracy has faced unprecedented challenges, especially in countries forming the EU’s eastern border. Recent experience shows that a cohesive and civically active society can respond much more quickly to various crises; therefore, support for strengthening societal resilience is of particular importance. This is a prerequisite for jointly protecting democratic values and ensuring stability, especially in the EU’s external eastern border region. Therefore, to strengthen European democracy at all levels, support for civil society must be as accessible and geographically balanced as possible, with minimal administrative burden and financial barriers (for example, with the lowest possible pre-financing and co-financing requirements, which are significant obstacles, particularly for local-level civil society organizations).</p> <p>Civic space in the EU is largely shaped by local-level organizations whose activities, despite limited human resources and funding opportunities, are essential for democratic and societal resilience, promoting public participation, and developing community-based initiatives. In the civil society sector, there are also significant barriers to accessing international funding, especially when pre-financing, co-financing, or complex administrative requirements are involved. To address these challenges, Latvia calls for the proposed “AgoraEU” Regulation to more clearly reflect the need for targeted support mechanisms for small and micro-level civil society organizations, as well as to maintain and strengthen re-granting opportunities to ensure broader accessibility and balanced civil society activity across the EU.</p> <p>Latvia, as part of the EU’s eastern border, faces ongoing challenges related to disinformation, foreign information manipulation and interference (FIMI), as</p>

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	<p>well as increasing risks of “news deserts,” particularly in the eastern border regions. Therefore, Latvia welcomes and agrees with the consolidation of EU financial support for news media and journalism and considers that support for the media ecosystem must be as targeted as possible.</p> <p>IT (Comments):</p> <p>IT supports the proposal for the AgoraEU programme, which is in line with the call of 27 Ministers of Culture launched in their letter of 14 January 2025 (“The future of the EU Creative Europe Programme”) addressed to the Commission VP and Commissioners Micallef and Serafin.</p> <p>In the letter, EU Ministers called for continuing the support at the EU level to cooperation and content creation in the cultural and creative sectors and industries, in the light of the ongoing digital transformation and technological innovations, such as artificial intelligence. “This support should be visible, inclusive, and sustainable, with creativity and cultural diversity at its core. The need for such cooperation at the EU level has never been more pressing, especially in the context of ongoing digital transformation and ever-changing world.”</p> <p>IT supports this new approach where support for a sustainable, competitive and pluralistic media and audiovisual space, the promotion and safeguarding of European cultural diversity and the support for fundamental rights, the rule of law, equality and values are mutually reinforcing.</p> <p>IT appreciates the new emphasis given intergenerational equity and inform policy development, and the commitment to increase visibility and autonomy, alongside procedural simplification</p> <p>FR (Comments):</p> <p>With regard to the percentage breakdown between the various strands and sub-strands, the French authorities would like the Presidency to specify the framework within which it intends to hold this discussion.</p>

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	<p>The introduction of a breakdown by strand, while maintaining a degree of flexibility, would ensure greater predictability for Member States and for the sector, while retaining sufficient room for manoeuvre in the event of crises or new priorities.</p> <p>France would also like an annex to be added to the regulation to detail the actions that could be carried out under the programme's various objectives. As mentioned in the ad hoc MFF group of 01/12, the French authorities consider that distribution of the amount shall remain the competence of the Cultural Affairs Committee and are in favour of minimum percentage envelopes, that would leave some margin of manoeuvre while giving previsibility to Members States and to the sectors, for example:</p> <p>The indicative distribution of the amount set out in article 11 shall be:</p> <ul style="list-style-type: none"> (a) at least XX% for the objective referred to in point (a) of article 3(2) (Culture) (b) at least XX% for the objective referred to in point (b)(i) of article 3(2) (audiovisual) (c) at least XX% for the objective referred to in point (b)(ii) of article 3(2) (news) (d) at least XX% for the objective referred to in point (c)(i) of article 3(2) (rights, equality, citizens and civil society) (e) at least XX% for the objective referred to in point (c)(ii) of article 3(2) (Daphne) (f) at least XX% for the objective referred to in point (c)(ii) of article 3(2) (democratic participation and rule of law) (g) at least XX% for the objective referred to in point (d) of article 3(3) (cross-cutting and horizontal priorities and activities) <p>DE (Comments):</p>

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	<p>All comments remain subject to a general scrutiny reservation with regard to the links with the other legislative proposals for the next Multiannual Financial Framework and the EUCO decision on the MFF. The results of the negotiations from the MFF AHWP on horizontal aspects must be fully taken into account.</p> <p>BE (Comments):</p> <p>BE welcomes this proposal that merges Creative Europe and CERV. We would like to emphasize that this merger must respect the balance between the different strands of the programme, as well as continuity and specific nature of the various sectors and strands concerned.</p> <p>We believe it is important that MS are involved in the implementation of the Programme. We believe the best way to do this, is by adding a strong programme committee into the regulation to ensure that Member States experts are involved in the decisions regarding the work programmes</p> <p>It is important to keep in mind and respect the principles of subsidiarity.</p> <p>We also believe that there is need to make the program accessible to small organizations (all strands).</p> <p>Finally we must ensure that there is enough long term predictability in the budgets of the strands to answer to needs of sectors that work with long term planning (e.g. audiovisual productions).</p> <p>AT (Comments):</p>

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	<p>AT is committed to strengthening the current programmes Creative Europe and CERV under a joint umbrella. Attention should be paid to achieving a good balance between the three strands. A less detailed programme regulation and greater flexibility in implementation, must go hand in hand with a strong role of the Member States within the comitology procedure, which is missing in the COM proposal. As annexes on concrete programme actions are missing as well, we need a stronger and more binding wording for the scope of the strands in Articles 4-9. In comparison, the wording for Erasmus+ sounds more specific. At least, we kindly ask the COM to provide a list of planned actions and calls, in order to be able to inform and consult national stakeholders.</p> <p>SK (Comments):</p> <p>As reflected in the progress report, a programme committee is to be established. A corresponding recital and an article should be added to the text of the regulation.</p>
2025/0550 (COD)	
<p style="text-align: center;">Proposal for a</p>	
<p style="text-align: center;">REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL</p>	
<p style="text-align: center;">establishing the 'AgoraEU' programme for the period 2028-2034, and repealing Regulations (EU) 2021/692 and (EU) 2021/818</p>	<p>PL (Comments):</p>

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	<p>The programme title refers to the social angle (CERV+) of the programme. The culture, the intrinsic value of which Creative Europe Programme emphasised and facilitated to develop, is pushed back and not visible, referred to in the shortest passage. We see feeble chance of the audience to associate the programme with culture sector. Special attention must be paid to avoiding imbalances between chapters.</p> <p>IE (Comments):</p> <p>Ireland notes the comments from several Member States that the name may be confusing or not offer clarity on the areas funded under the programme. Ireland is open to other suggestions which are may be more explanatory. Sub-titled heading which lists Creative Europe, Media+ and CERV could help. The Creative Europe brand is very strong within target groups, and the loss of Creative Europe to both Culture and MEDIA (AV/Film) programmes would likely cause confusion, risking a loss of branding and visibility within key target groups. In that regard, it will be important that there is a clear and adequate public campaign to inform the public of the new programme and to equip the programme desks to be part of this campaign</p> <p>DE (Drafting suggestions):</p> <p>establishing the 'AgoraCreative EU' programme for the period 2028-2034, and repealing Regulations (EU) 2021/692 and (EU) 2021/818</p> <p>DE (Comments):</p> <p>The previously defining attribute “Creative” has been lost in the new name of the program. In our view, it is important to reflect the character of the programme as supporting creativity or “the creative process” in Europe more strongly in its name, for example by using “AgoraCreative EU” or a similar</p>

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	<p>wording. The Agora used to be the central market- and meetingplace in ancient Greece - but not mainly for creative purposes. The creative aspect - which summarizes two of three strands, culture and media – should be made visible. “Agora” stands for the societal aspect, “Creative” for the cultural and medial aspects of the programme.</p> <p>AT (Comments):</p> <p>The new programme name sounds very general and non-destinctive, as globally there are several initiatives with the same name. It also seems inappropriate for some topics of the programme (especially with respect to fight against gender-based violence). With the change of the brand every 7 years (CERV) repectively 14 years (Creative Europe) there a a risk of a loss of visibility and impact. Therefore we prefer to keep the current programme names for communication purposes for the strands Culture, MEDIA+ and CERV+. Alternatively, AT is open to a descriptive programme name, such as “Culture and Democracy Programme”.</p>
<p>THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,</p>	
<p>Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 19(2), 21(2), 24, 167(5), 168(5) and 173(3) thereof,</p>	
<p>Having regard to the proposal from the European Commission,</p>	
<p>After transmission of the draft legislative act to the national parliaments,</p>	

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Having regard to the opinion of the European Economic and Social Committee ¹ , <hr/> 1 OJ C , , p. .	
Having regard to the opinion of the Committee of the Regions ² , <hr/> 2 OJ C , , p. .	
Acting in accordance with the ordinary legislative procedure	
Whereas:	DE (Comments): The currently applicable Regulation 2021/818 addresses the relevance of small projects in recital 25, which (neither directly nor indirectly) can not be found in this draft. For small projects and small organisations in structurally weak regions, the annual work programmes should be able to provide for deviating, higher co-financing rates and simplified reporting and evidence requirements. In-kind contributions and the provision of goods or services should be accepted as eligible co-financing where documented in simplified form. A corresponding reference/basis should be included in the regulation; e.g. via a recital or in the (not yet existing) annex.
(1) Pursuant to Article 2 of the Treaty on European Union (TEU), the Union is founded on the values of respect for human dignity, freedom,	IT

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<p>democracy, equality, the rule of law and the respect for human rights, including the rights of persons belonging to minorities, which are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail ('Union values'). The Union values are reflected in the rights, freedoms and principles set out in the Charter of Fundamental Rights of the European Union (the 'Charter'). Article 3 TEU further mandates the Union to promote the protection of the rights of the child. Article 10 TEU further states that the functioning of the Union shall be founded on representative democracy, that citizens are directly represented at Union level in the European Parliament and that citizens have the right to participate in the democratic life of the Union. Article 20 establishes Union citizenship and sets out important rights that citizens of the Union shall, inter alia, enjoy.</p>	<p>(Drafting suggestions):</p> <p>(1) Pursuant to Article 2 of the Treaty on European Union (TEU), the Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and the respect for human rights, including the rights of persons belonging to minorities, which are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail ('Union values'). The Union values are reflected in the rights, freedoms and principles set out in the Charter of Fundamental Rights of the European Union (the 'Charter'). Article 3 TEU further mandates the Union to promote the protection of the rights of the child. Article 10 TEU further states that the functioning of the Union shall be founded on representative democracy, that citizens are directly represented at Union level in the European Parliament and that citizens have the right to participate in the democratic life of the Union. Article 20 establishes Union citizenship and sets out important rights that citizens of the Union shall, inter alia, enjoy. Article 3 TEU further specifies that the Union's aim is to promote peace, its values and the well-being of its peoples and that, inter alia, it is to respect its rich cultural and linguistic diversity and ensure that Europe's cultural heritage is safeguarded and enhanced.</p> <p>IT</p> <p>(Comments):</p> <p>We suggest to add a reference to Article 3(3) of the Treaty on European Union (TEU) and Article 167 of the Treaty on the Functioning of the European Union (TFEU), (both are referenced in the Regulation establishing the current CE programme), as they provide the legal basis for EU action in the field of culture.</p> <p>HR</p> <p>(Drafting suggestions):</p>

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	<p>Pursuant to Article 2 of the Treaty on European Union (TEU), the Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and the respect for human rights, including the rights of persons belonging to minorities, which are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail ('Union values'). The Union values are reflected in the rights, freedoms and principles set out in the Charter of Fundamental Rights of the European Union (the 'Charter') including cultural diversity as also embodied in the UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions and with the emphasis on promoting equality and preventing and combating inequalities and discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, and respecting the principle of non-discrimination on the grounds provided for in Article 21 of the Charter. Article 3 TEU further mandates the Union to promote the protection of the rights of the child. Article 10 TEU further states that the functioning of the Union shall be founded on representative democracy, that citizens are directly represented at Union level in the European Parliament and that citizens have the right to participate in the democratic life of the Union. Article 20 establishes Union citizenship and sets out important rights that citizens of the Union shall, inter alia, enjoy. The Union also recognizes the essential role of culture, the audiovisual and media sectors in safeguarding pluralism, fostering democratic debate, supporting cultural and linguistic diversity and enhancing societal resilience."</p> <p>HR (Comments):</p> <p>Croatia supports the preamble but suggests explicitly acknowledging culture, AV and media as key to democratic life. Thus, MEDIA+ should be recognised from the start as an instrument to support pluralism, diversity and resilience.</p>

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	<p>This reinforces the EU’s policy coherence between Union values and support to audiovisual and news media.</p> <p>We would also suggest that the Article 21 of the Charter of the Fundamental rights as part of the current regulation of the CERV programme (EU) 2021/692 (Article 4., point 1) is emmabded as one of the legal basis in the new proposal of the regulation. The result will be more clear definition of one of the Programme’s scopes and we would propose that it is added in the text of the proposal of the regulation where suitable and applicable.</p> <p>FR (Drafting suggestions):</p> <p>(1) Pursuant to Article 2 of the Treaty on European Union (TEU), the Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and the respect for human rights, including the rights of persons belonging to minorities, which are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail (‘Union values’). The Union values are reflected in the rights, freedoms and principles set out in the Charter of Fundamental Rights of the European Union (the ‘Charter’). In particular, Article 11 of the Charter establishes that media freedom and pluralism shall be respected. Article 3 TEU further mandates the Union to promote the protection of the rights of the child. Article 10 TEU further states that the functioning of the Union shall be founded on representative democracy, that citizens are directly represented at Union level in the European Parliament and that citizens have the right to participate in the democratic life of the Union. Article 20 establishes Union citizenship and sets out important rights that citizens of the Union shall, inter alia, enjoy.</p> <p>FR (Comments):</p> <p>Recital 1 should include a reference to Article 11 of the Charter of Fundamental Rights, and in particular to the principle of pluralism. More</p>

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	<p>broadly, from the perspective of the French delegation, the recitals could refer to the principles of reciprocity and cultural diversity enshrined in the 2005 UNESCO Convention, in order to strengthen the presence of European cultural and media actors on the international stage.</p> <p>BE (Drafting suggestions):</p> <p><u>“The Union values are reflected in the rights, freedoms and principles set out in the Charter of Fundamental Rights of the European Union (the ‘Charter’). [Specifically in its article 11 on freedom of expression and information and article 13 on freedom of the arts and sciences”]</u></p> <p><u>“Article 3 TEU further mandates the Union to promote the protection of the rights of the child [and establish an internal market that shall respect its rich cultural and linguistic diversity, and shall ensure that Europe's cultural heritage is safeguarded and enhanced.”]</u></p> <p>“ – BE (Comments):</p> <p>Article 3 TEU also refers to cultural and linguistic diversity, as well as cultural heritage. Why is this not mentioned?</p> <p>Why is there no reference to Articles 11 and 13 of the Charter and more specifically, the freedom of expression and information and the freedom of the arts?</p> <p>NL (Comments):</p>

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	<p>How will clear mechanisms be established for the European Commission to monitor that beneficiaries of EU funds are not acting against the EU Charter of Fundamental Rights, either in the funded project or their other activities? Including CSOs working on the protection of fundamental rights in this monitoring?</p> <p>SI (Drafting suggestions):</p> <p>...the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men and between all gender identities prevail ('Union values')...</p> <p>SI (Comments):</p> <p>The Charter of Fundamental Rights of the European Union (Article 21) explicitly prohibits discrimination on grounds of sex. In cases C-13/94 <i>P. v. S.</i> and C-451/16 <i>MB</i>, the Court of Justice of the European Union interpreted this prohibition as also covering discrimination related to gender reassignment, providing the basis for a broader interpretation that today extends to gender identity</p>
<p>(2) Culture and media and promotion and respect of Union values are all crucial components of a free, fair, diverse, inclusive and cohesive Union. Citizens' participation and engagement, in due respect of Union values, constitutes the basis of the democratic life of the Union, with media playing a crucial role in shaping public opinion and free debate. Audiovisual works and all other forms of cultural and creative expressions, including cultural heritage, are essential to Europe's diversity and to forging societal resilience and mutual understanding among European citizens and communities.</p>	<p>RO (Drafting suggestions):</p> <p>This recital links media to free debate and the values of the Union. Without editorial independence, media risks becoming a tool of propaganda rather than a vehicle for free debate and accurate information. Integrating editorial independence into the recital is therefore not only appropriate but necessary. Strengthening editorial independence becomes a prerequisite for the media's robust role in the democratic life of the Union. A possible reformulation could</p>

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	<p>include: “media [and its editorial independence] playing an essential role in shaping public opinion and free debate.”</p> <p>Additionally, video games constitute part of the European cultural and creative sector and represent a contemporary form of cultural and creative expression, with major potential for Europe’s diversity and for citizen engagement, especially among young people. A clarification indicating that, alongside audiovisual works or cultural heritage, video games are also considered as a form of cultural and creative expression would bring added clarity. A possible reformulation could be: “Audiovisual works and all other forms of cultural and creative expression, including cultural heritage or video games.”</p> <p>DE (Drafting suggestions):</p> <p>(2) Culture and media and as well as promotion and respect of Union values are all crucial components of a free, fair, diverse, inclusive and cohesive Union. Citizens’ participation and engagement, in due respect of Union values, constitutes the basis of the democratic and cultural life of the Union, with media playing a crucial role in shaping public opinion and free debate. Audiovisual works and all other forms of cultural and creative expressions, including cultural heritage, are essential to Europe’s diversity and to forging societal resilience and mutual understanding among European citizens and communities.</p> <p>DE (Comments):</p> <p>Linguistic adaptation to clarify the unity of meaning.</p>

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	<p>Intrinsic value!</p> <p>BE (Comments):</p> <p>Why is it not mentioned that culture, non-formal and informal learning in the field of youth and education play a key role in building inclusive and cohesive societies?</p> <p>SI (Drafting suggestions):</p> <p>Add sentence at end: The Programme shall safeguard balanced visibility and dedicated resources for each policy field, maintaining the acquired achievements of the CERV and Creative Europe Programmes.</p> <p>SI (Comments):</p> <p>The merger of CERV and Creative Europe entails a real risk of thematic dilution: larger cultural operators may absorb funding intended for equality and democracy. The amendment establishes a legal presumption of budgetary balance and continuity, fulfilling Article 5 TEU (proportionality) by preserving existing successful mechanisms while pursuing efficiency through synergies.</p>
	<p>FR (Drafting suggestions):</p> <p>2a. The Union is committed at the international level to green transition, as enacted in its laws by the Green New Deal. Culture and media, as key European business sectors, have a significant environmental footprint, <i>inter alia</i>, of greenhouse-gas emissions and on biodiversity. Cultural</p>

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	<p>activities and sites are heavily exposed to the various effects of climate change. They also have a unique power to mobilise Europe to become more sustainable and resilient. Reducing its environmental footprint, adapting to climate change (“green for culture”), and empowering the overall green transition (“culture for green”), are objectives of the Union.</p> <p>FR (Comments):</p> <p>The reference to environmental issues in the recitals currently under discussion is partial (it only addresses climate change adaptation. Yet, culture as an economic sector has a significant impact on greenhouse gas emissions (over 1% of total CO₂ emissions in France for the artistic creation sector alone, and considerably more when including heritage, audiovisual, and other cultural industries); there is therefore a clear need to mitigate these emissions. Culture also has a role to play in addressing the biodiversity crisis, which is distinct in its causes and effects from the climate crisis) and fragmented (it appears only incidentally in the enumeration in recitals 8, 9, and 26, among numerous other challenges facing the cultural sector). It would be desirable to give ecological transition a strong, distinct place, as a fundamental commitment of the Union, in which culture must play its part (“green for culture”) and contribute by mobilizing for the transition (“culture for green”).</p>
<p>(3) The ‘AgoraEU’ Programme (the ‘Programme’) will provide a significant contribution to the attainment and realisation of these objectives, rights and values.</p>	<p>HR (Drafting suggestions):</p> <p>The ‘AgoraEU’ Programme (the ‘Programme’) will provide a significant contribution to the attainment and realisation of these objectives, rights and values. In doing so, the Programme shall in particular strengthen the cultural, audiovisual and media sectors, supporting cultural and linguistic diversity and fostering pluralism, innovation and democratic</p>

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	<p>resilience, while taking into account the specific needs of audiovisual markets of different sizes across the Union.</p> <p>FR (Drafting suggestions):</p> <p>(3) The ‘AgoraEU’ Programme (the ‘Programme’) will provide a significant contribution to the attainment and realisation of these objectives, rights and values, <u>by supporting actions and activities with European added value, which complement regional, national and international actions of the Union and the Member States.</u></p> <p>FR (Comments):</p> <p>In accordance with the division of competences between the EU and the Member States in the field of culture, the recital should explicitly refer to the importance of actions and activities implemented under the Agora Programme providing European added value and being planned in close coordination with regional, national and international actions by the EU and Member States.</p>
<p>(4) The Programme should succeed the Creative Europe Programme established by Regulation (EU) 2021/818 of the European Parliament and the Council³ and the Citizens, Equality, Rights and Values Programme, established by Regulation (EU) 2021/692 of the European Parliament and of the Council⁴. It should streamline various funding actions in support of media freedom and pluralism, fight against disinformation in support of the provision on information on Union affairs. Free and pluralistic media and civil society are among key watchdogs of the Union’s democratic systems, playing a crucial role for democratic resilience, and should be supported. The Programme should also support the cultural, creative and media sectors, harness the power of culture and cultural diversity, enhance the information space, and support the Union’s efforts to strengthen a rights-based, inclusive, equal and</p>	<p>RO (Comments):</p> <p>Given that AgoraEU replaces the former CERV and Creative Europe programmes and brings together culture, creation, media, the information space, journalism, and democratic values under one unified framework, we consider it necessary to clarify the existence of distinct funding strands. Rationalisation should not lead to dilution of support for news media and pluralism; on the contrary, clear strands should ensure sustained funding for public-interest journalism, including a better balance between audiovisual funding and support for the news media. Clarifications could state that a defined part of the</p>

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<p>democratic society. [This Regulation lays down an indicative financial envelope for the ‘AgoraEU’ Programme⁵. For the purpose of this Regulation, current prices are calculated by applying a fixed 2% deflator.]</p> <hr/> <p>3 Regulation (EU) 2021/818 of the European Parliament and of the Council of 20 May 2021 establishing the Creative Europe Programme (2021 to 2027) and repealing Regulation (EU) No 1295/2013 (OJ L 189, 28.5.2021, p. 34, ELI: http://data.europa.eu/eli/reg/2021/818/oj).</p> <p>4 Regulation (EU) 2021/692 of the European Parliament and of the Council of 28 April 2021 establishing the Citizens, Equality, Rights and Values Programme and repealing Regulation (EU) No 1381/2013 of the European Parliament and of the Council and Council Regulation (EU) No 390/2014 (OJ L 156, 5.5.2021, p. 1, ELI: http://data.europa.eu/eli/reg/2021/692/oj).</p> <p>5 Where relevant, the support provided by the Programme shall accelerate or boost investments by addressing market failures or sub-optimal investment situations, in a proportionate manner, avoiding duplication or crowding out, and by incentivising private funding, and shall have Union added-value.</p>	<p>budget should be dedicated to communication campaigns and EU-related disinformation prevention, with particular attention to Member States where democratic risks or vulnerabilities have been identified.</p> <p>Recital (4) also establishes an indicative financial envelope for AgoraEU. We consider it useful to clarify that this envelope is intended to work in complementarity with, not above, national policies and funding mechanisms, helping to reinforce cultural diversity and democratic resilience. Support for cultural, creative and media sectors should be designed in alignment with national systems and with respect for the specificities of Member States’ audiovisual markets.</p> <p>IE (Drafting suggestions):</p> <p>The Programme should succeed the Creative Europe Programme established by Regulation (EU) 2021/818 of the European Parliament and the Council and the Citizens, Equality, Rights and Values Programme, established by Regulation (EU) 2021/692 of the European Parliament and of the Council . It should streamline various funding actions in support of media freedom and pluralism, fight against disinformation in support of the provision on information on Union affairs. Free and pluralistic media and civil society are among key watchdogs of the Union’s democratic systems, playing a crucial role for democratic resilience, and should be supported. The Programme should also support the cultural, creative and media sectors, harness the power of culture and cultural diversity, enhance the information space. The Programme should sustain and develop open, rights-based, democratic, equal and inclusive societies based on the rule of law and values enshrined in the EU treaties and the Charter of Fundamental Rights. This includes a vibrant and empowered civil society, encouraging people’s democratic, civic and social participation and cultivating the</p>

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	<p>rich diversity of European society. [This Regulation lays down an indicative financial envelope for the ‘AgoraEU’ Programme . For the purpose of this Regulation, current prices are calculated by applying a fixed 2% deflator.</p> <p>IE (Comments):</p> <p>Drafting suggestion</p> <p>DE (Drafting suggestions):</p> <p>(4) The Programme should succeed the Creative Europe Programme established by Regulation (EU) 2021/818 of the European Parliament and the Council and the Citizens, Equality, Rights and Values Programme, established by Regulation (EU) 2021/692 of the European Parliament and of the Council . It should streamline various funding actions in support of media freedom and pluralism, fight against disinformation in support of the provision on information on Union affairs. Free and pluralistic media and civil society are among key watchdogs of the Union’s democratic systems, playing a crucial role for democratic resilience, and should be supported. The Programme should also support the cultural, creative and media sectors.; The intrinsic value of culture and artistic expression should be preserved and promoted; artistic creation should be at the heart of the programme’s culture strand. Additionally, the programme should harness the power of culture and cultural diversity, enhance the information space, and support the Union’s efforts to strengthen a rights-based, inclusive, equal and democratic society. [This Regulation lays down an indicative financial envelope for the ‘AgoraEU’ Programme . For the purpose of this Regulation, current prices are calculated by applying a fixed 2% deflator.]</p> <p>DE (Comments):</p>

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	<p>The intrinsic value of culture should be given priority. The text proposal inserted here corresponds to point 4 of the previous Creative Europe Regulation (Regulation 2021/818).</p> <p>BE (Drafting suggestions): <u>“The Programme should also support the cultural, creative and media sectors, harness the power of culture and cultural diversity, [as as enshrined in the 2005 UNESCO Convention]”</u></p> <p>BE (Comments): It seems appropriate to place greater emphasis in this paragraph on fostering the cross-border dimension and on preserving and promoting the intrinsic value of cultural and artistic expression, consistent with the 2005 UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions.</p> <p>AT (Comments): AT welcomes the merger of Creative Europe and CERV in terms of common objectives which could trigger new/further synergies between culture, audiovisual, media, democracy and citizenship, thereby increasing cross-sectoral cooperation. AT welcomes the enhancement of EU funding for the news media sector.</p> <p>SI (Drafting suggestions): The Programme should succeed the Creative Europe Programme established by Regulation (EU) 2021/818 of the European Parliament and the Council^A and the Citizens, Equality, Rights and Values Programme, established by</p>

^A Regulation (EU) 2021/818 of the European Parliament and of the Council of 20 May 2021 establishing the Creative Europe Programme (2021 to 2027) and repealing Regulation (EU) No 1295/2013 (OJ L 189, 28.5.2021, p. 34, ELI: <http://data.europa.eu/eli/reg/2021/818/oj>).

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	<p>Regulation (EU) 2021/692 of the European Parliament and of the Council^B. Distinct identities for the successor strands shall be maintained to ensure continuity for applicants and National Contact Points....</p> <p>SI (Comments):</p> <p>CERV and Creative Europe have built strong, recognisable communities of applicants and evaluators. Abrupt rebranding would disrupt access and visibility, especially for small CSOs and municipalities. Maintaining strand identities reduces transition costs and information asymmetry, ensuring that structural reforms do not compromise the high absorption rate achieved by smaller Member States such as Slovenia.</p>
	<p>FR (Drafting suggestions):</p> <p>This indicative financial envelope shall be broken down by strand and sub-strand, while a non-allocated reserve shall be maintained to ensure flexibility.</p> <p>FR (Comments):</p> <p>The French authorities reiterate its desire for an appropriate breakdown to be provided for each strand and sub-strand of the programme, while retaining an unallocated budget to give the European Commission sufficient flexibility in implementing the programme. It will also propose a reference to the programme committee within this recital.</p>

^B Regulation (EU) 2021/692 of the European Parliament and of the Council of 28 April 2021 establishing the Citizens, Equality, Rights and Values Programme and repealing Regulation (EU) No 1381/2013 of the European Parliament and of the Council and Council Regulation (EU) No 390/2014 (OJ L 156, 5.5.2021, p. 1, ELI: <http://data.europa.eu/eli/reg/2021/692/oj>).

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	(this comment is made without prejudging the forum in which this breakdown will actually be included.)
<p>(5) To be effective, the Programme should take into account the specific nature and challenges of the different policy areas and sectors, their different target groups and their particular needs through targeted approaches.</p>	<p>FR (Drafting suggestions): To be effective, the Programme should take into account the specific nature and challenges of the different policy areas and sectors, their different target groups and their particular needs through targeted approaches and appropriate means.</p> <p>NL (Comments): Based on this logic, AgoraEU must have earmarked budgets for different sectors, budgets that take into account their specificities. The audiovisual sectors, the news media, and the component focusing on cultural and audiovisual programs with human rights and equality themes, referred to as "cross-sectoral," must have their own distinct budgets.</p> <p>SI (Drafting suggestions): Append: “Targeted approaches shall include small-grant and re-granting schemes for grassroots CSOs and municipalities.”</p> <p>SI (Comments): The Commission states that financial support to third parties (re-granting) “has proven efficient [...] and will continue and could be extended”, and that obstacles for grassroots organisations will be addressed via targeted simplification. The recital should reflect these already-announced modalities</p>
<p>(6) In a fast changing economic, social and geopolitical environment, the recent experience has shown the need for a more flexible multiannual financial</p>	<p>RO (Comments):</p>

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<p>framework and its programmes. To that effect, and in line with the objectives of the ‘AgoraEU’ Programme, the funding will take due account of the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions while ensuring sufficient predictability for the implementation.</p>	<p>Recital (4) also establishes an indicative financial envelope for AgoraEU. We consider it useful to clarify that this envelope is intended to work in complementarity with, not above, national policies and funding mechanisms, helping to reinforce cultural diversity and democratic resilience. Support for cultural, creative and media sectors should be designed in alignment with national systems and with respect for the specificities of Member States’ audiovisual markets.</p> <p>FR (Drafting suggestions):</p> <p>(6) In a fast changing economic, social and geopolitical environment, the recent experience has shown the need for a more flexible multiannual financial framework and its programmes. To that effect, and in line with the objectives of the ‘AgoraEU’ Programme, the funding will take due account of the evolving policy needs and Union’s priorities as identified hand in hand with the Programme Committee and in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions while ensuring sufficient predictability for the implementation.</p> <p>DE (Comments):</p> <p>For public cultural institutions as well as for creative professionals, among others, simplifying the application process for funding would be crucial. Many of these individuals and institutions (e.g., neighborhood libraries, music schools, and local archives) lack specialized expertise in EU funding.</p> <p>BE (Comments):</p>

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	<p>Continuity and balance should be ensured in the allocation of funding across the different strands of the programme.</p> <p>AT (Comments):</p> <p>Greater flexibility of the programme must not lead to weakening of the MS role in governance! A less detailed regulation, must go hand in hand with a strong role of the Member States within the comitology procedure, which is missing in the COM proposal.</p> <p>NL (Comments):</p> <p>NL will strive for straightforward management based on transparency and accountability. It is desirable that it be clear where decision-making on the work program and budget allocation takes place. NL would also like to see a midterm and final evaluation added to the Commission proposal.</p> <p>SI (Drafting suggestions):</p> <p>Add a new second sentence: “Predictability shall be ensured inter alia through multi-annual grants and biennial work programmes.”</p> <p>SI (Comments):</p> <p>The proposal states that multi-annual grants will increase and that simplification will enhance predictability. A recital reference to biennial planning reinforces this predictability without restricting flexibility.</p>
<p>(7) The cultural and creative sectors, including performing arts (such as theatre and dance), literature and book publishing, music, visual arts, tangible and intangible cultural heritage, architecture, archives, libraries and museums, crafts and design (including fashion design), serve as ‘public good’, generating meaning and embodying the values of the Union. They are also a great asset</p>	<p>RO (Comments):</p> <p>We consider that there is a need for a clearer definition of the cultural and creative sectors, aligned with proposed amendments to Article 2.</p>

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<p>for the Union and its regions, attracting sustainable tourism and projecting the image of a dynamic continent on the world stage. The Programme should take into account, on the one hand, their intrinsic and artistic value, as well as, on the other hand, their extrinsic social and economic contributions, including to social and territorial cohesion, well-being and health, growth and job creation, competitiveness, creativity and innovation.</p>	<p>Given the volatility and constant evolution of these industries, a non-exhaustive definition of the cultural and creative sectors would ensure clarity while retaining flexibility.</p> <p>Furthermore, the recital lists cultural and creative sectors without explicitly mentioning emerging creative sectors such as video games. Video games are a highly innovative industry with a complex value chain and are significant drivers of cultural export, high-skilled jobs and digital competencies. Including video games explicitly would not only acknowledge their role but would operationalise their potential contribution to growth, competitiveness and innovation.</p> <p>IT (Comments): We support the reference to the cultural and creative sectors serving as ‘public good’. Culture, like other equally essential sectors for our citizens, must be considered a “European public good”.</p> <p>IE (Comments): It is essential that the intrinsic value of culture continues to be a priority for support under Culture and Media strands. Key actions such as Culture Moves Europe, Cultural Cooperation Projects etc., play an important role in developing capacity in the sector and fostering cross-border collaboration. It is important to retain these programmes which face significant demand. Previous evaluations of Creative Europe have consistently highlighted the strong impact of these programmes and the need for additional resourcing.</p> <p>HR (Drafting suggestions):</p>

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	<p>The cultural and creative sectors — including the audiovisual and media industries, performing arts (such as theatre and dance), literature and book publishing, music, visual arts, tangible and intangible cultural heritage, architecture, archives, libraries and museums, crafts and design (including fashion design) — serve as a 'public good', generating meaning and embodying the values of the Union. They are also a great key asset for the Union and its regions, projecting Europe’s cultural and linguistic diversity, strengthening democratic debate and media pluralism, attracting sustainable tourism and projecting the presenting a dynamic image of a the continent on the world stage. In implementing the Programme, the Union shall take into account, on the one hand both their intrinsic and artistic value, as well as, on the other hand, and their extrinsic social and economic contributions, including to social and territorial cohesion, well-being and health, growth and job creation, competitiveness, creativity and innovation. The Programme shall also recognise the different capacities of audiovisual and other cultural markets, ensuring balanced access for small and medium-sized markets and linguistic communities, and supporting their ability to collaborate, innovate and reach audiences across the Union.</p> <p>HR (Comments):</p> <p>Croatia welcomes the recognition of the cultural and creative sectors but suggests:</p> <ul style="list-style-type: none"> • Explicitly naming audiovisual and media among the sectors, since they are crucial both culturally and economically. • Acknowledging the diversity of market sizes to avoid concentration of support in big countries and ensure smaller markets remain competitive and visible. This complements the Programme’s objective of fostering pluralism, diversity and equal participation. <p>DE</p>

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	<p>(Drafting suggestions):</p> <p>(7) In addition to the intrinsic value of culture, tThe cultural and creative sectors, including performing arts (such as theatre and dance), literature and book publishing, music, visual arts, tangible and intangible cultural heritage, architecture, archives, libraries and museums, crafts and design (including fashion design), can serve as a ‘public good’, generating meaning and embodying the values of the Union. They are also a great asset for the Union and its regions, attracting sustainable tourism and projecting the image of a dynamic continent on the world stage. The Programme should take into account, on the one hand, their intrinsic and artistic value, as well as, on the other hand, their extrinsic social and economic contributions, including to social and territorial cohesion, well-being and health, growth and job creation, competitiveness, creativity and innovation.</p> <p>DE</p> <p>(Comments):</p> <p>See comment on recital 4 above;</p> <p>The value of the cultural and creative sectors is not primarily being a “public good”.</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>(7) The cultural and creative sectors, including performing arts (such as theatre and dance), literature and book publishing, music, visual arts, tangible and intangible cultural heritage, architecture, archives, libraries and museums, crafts and design (including fashion design), serve as ‘public good’, generating meaning and embodying the values of the Union. They are also a great asset for the Union and its regions, attracting sustainable tourism and projecting the image of a dynamic continent on the world stage. The Programme should take into account, on the one hand, their intrinsic and artistic value, as well as, on the other hand, their extrinsic social and</p>

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	<p>economic contributions, including to social and territorial cohesion, well-being and health, growth and job creation, competitiveness, education, creativity and innovation.</p> <p>AT (Comments): The definition of CCS should also be defined in article 2 as a non exhaustive list. We welcome the approach on culture as a public good. We welcome the reference to health & wellbeing. Please add reference to education.</p> <p>NL (Comments): Recital 7 emphasizes the importance of respecting intrinsic and artistic value when supporting the CCS. This recital underscores the importance of clearly incorporating cross-sectoral themes into a separate program with its own budget and perhaps even its own label.</p> <p>SI (Drafting suggestions): Add at the end: “The Programme shall also promote cross-sectoral cooperation between culture, media and civil society to enhance social cohesion and democratic participation. Stakeholder participation shall include a permanent Civil Dialogue Group assisting the Commission.”</p> <p>SI (Comments): Integrating a civic-participation dimension ensures that culture and media are not treated merely as economic sectors but as vectors of democratic life. This aligns with Article 167(4) TFEU, which requires cultural policy to contribute to “respect and promotion of the diversity of its cultures” and supports the European Democracy Action Plan.</p>

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<p>(8) The cultural and creative sectors are however fragmented along national and linguistic lines in the Union. They also face multiple challenges, such as attacks on freedom of artistic expression, precarious working conditions, digital transformations with the rise of artificial intelligence, and the need to adapt to climate change. The Programme should help those sectors respond to such challenges, untap their full potential and project themselves resolutely into the future while ensuring the widest participation, including from local and regional actors, through various channels and formats.</p>	<p>RO (Drafting suggestions): This recital notes that cultural and creative sectors are fragmented along national and linguistic lines and highlights the need to support local and regional actors. Fragmentation is particularly visible in small markets, which face barriers to funding, distribution, technological adaptation (including to AI), and digital consumption models. We therefore support clarifying “through different channels and in different formats” by referencing cohesion principles and including an illustrative (non-exhaustive) list, such as mechanisms for adapting to technological change, equitable access for small audiovisual markets, and a standing European consultative mechanism bringing together representative associations, NGOs, fact-checkers and researchers.</p> <p>PL (Drafting suggestions): (8) The cultural and creative sectors are however fragmented along national and linguistic lines in the Union. They also face multiple challenges, such as attacks on freedom of artistic expression, precarious working conditions, digital transformations with the rise of artificial intelligence, and the need to adapt to climate change. The Programme should help those sectors respond to such challenges, untap their full potential and project themselves resolutely into the future while ensuring the widest participation, including from local and regional actors, through various channels and formats, and ensure fair working conditions, adequate remuneration and social protection for artists, creators and freelance professionals participating in the cultural and creative sectors, in line with the Union’s principles of decent work and social rights.</p> <p>PL (Comments):</p>

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	<p>Since the catalogue is not exhaustive, proposed addition reinforces the Programme’s social dimension by promoting fair working conditions, adequate pay and social protection for artists and creative professionals. It aligns the Programme with the EU’s core principles of decent work and social rights, addressing the widespread precarity in the cultural and creative sectors.</p> <p>IE (Comments):</p> <p>Ireland welcomes the thematic focuses on addressing the challenges faced by artists from artificial intelligence, precarious working conditions, challenges to freedom of expression and climate change</p> <p>HR (Drafting suggestions):</p> <p>The cultural and creative sectors are, however, fragmented along national and linguistic lines in the Union. They also face multiple challenges, such as attacks on freedom of artistic and media expression, precarious working conditions, rapid digital transformation with — including the rise of artificial intelligence — and the need to adapt to climate change. The Programme should help those sectors respond to such challenges, safeguard artistic freedom and media pluralism, strengthen their capacity to innovate and remain economically viable, and untap unlock their full potential and project themselves resolutely into future while ensuring. It should pay particular attention to the specific situation of small and medium markets and linguistic communities, supporting fair access to EU opportunities and cross-border cooperation. The Programme should enable the widest participation, including from local and regional actors and independent media outlets, through diverse channels and formats.</p> <p>HR (Comments):</p>

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	<p>Croatia welcomes the focus on fragmentation and challenges but recommends:</p> <ul style="list-style-type: none"> • explicitly including media and audiovisual freedom and pluralism alongside artistic expression; • recognising the specific difficulties of small and linguistically diverse markets; • ensuring AI/digital transition support does not bypass smaller players. <p>DE (Drafting suggestions):</p> <p>(8) The cultural and creative sectors are however fragmented along national and linguistic lines in the Union. They also face multiple challenges, such as attacks on freedom of artistic expression, precarious working conditions, digital transformations with the rise of artificial intelligence, and the need to adapt to climate change. In the age of artificial intelligence, human creativity remains irreplaceable. The Programme - as the only EU programme with a clear focus on human creativity - should help those sectors respond to such challenges, untap their full potential and project themselves resolutely into the future while ensuring the widest participation, including from local and regional actors, through various channels and formats.</p> <p>The Programme should help those sectors respond to such challenges, untap their full potential and project themselves resolutely into the future while ensuring the widest participation, including from local and regional actors, through various channels and formats.</p> <p>DE (Comments):</p> <p>Human creativity is the unique single point of this programme. AI is an asset, but also a challenge. Therefore it is essential to address this here.</p> <p>AT</p>

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	<p>(Comments):</p> <p>We welcome the references to the challenges with respect to working conditions, climate change and A.I.</p>
	<p>FR</p> <p>(Drafting suggestions):</p> <p>(8a) new Music, in all its forms and expressions, is an important component of the cultural, artistic and economic landscape of the Union and its heritage. It is an element of social cohesion and it serves as a key instrument to enhance economic and cultural development.</p> <p>To respond to shared needs within the Union, the following actions shall be supported the music sector, whose specificities or specific challenges require a more targeted approach that complements the horizontal actions: actions that promote diversity, creativity and innovation in the field of music, including live performance, in particular, the production, distribution and promotion of all musical repertoires in Europe and beyond, training actions, participation in and access to music, and audience development for all European repertoires, and support for data gathering and analysis; those actions shall build on and continue to support the experiences and expertise gained within the ‘Music moves Europe’ initiative</p> <p>FR</p> <p>(Comments):</p> <p>The French authorities would like to add a specific recital to be devoted to the music sector.</p>
<p>(9) Europe's cultural heritage is a shared and priceless legacy facing budget constraints, natural and human-induced disasters, climate change, and regional conflicts. It is important to safeguard and preserve such a legacy, enhancing access and fostering a collective European identity. Digital preservation</p>	<p>RO</p> <p>(Comments):</p> <p>This recital refers to European cultural heritage, emphasising protection and access as foundations for a shared European identity.</p>

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<p>further ensures that future generations can learn from, appreciate, and draw inspiration from their cultural heritage.</p>	<p>We support improving clarity by noting the need for equitable and inclusive access, including through gender mainstreaming and accessibility for children, young people and vulnerable groups.</p> <p>LV (Drafting suggestions):</p> <p>(9) Europe's cultural heritage is a shared and priceless legacy facing budget constraints, natural and human-induced disasters, climate change, and regional conflicts. It is important to safeguard and preserve such a legacy, <u>including the heritage of indigenous peoples and other traditional cultural communities</u>, enhancing access and fostering a collective European identity. Digital preservation further ensures that future generations can learn from, appreciate, and draw inspiration from their cultural heritage.</p> <p>IT (Drafting suggestions):</p> <p>(9) The ideals, principles and values embedded in Europe's cultural heritage constitute a shared source of remembrance, understanding, identity, dialogue, cohesion and creativity for Europe. Cultural heritage plays a role in the European Union and the preamble to the Treaty on European Union (TEU) states that the signatories drew inspiration from the cultural, religious and humanist inheritance of Europe. Europe's cultural heritage is a shared and priceless legacy facing budget constraints, natural and human-induced disasters, climate change, and regional conflicts. It is important to safeguard and preserve such a legacy, enhancing access and fostering a collective European identity. Digital preservation further ensures that future generations can learn from, appreciate, and draw inspiration from their cultural heritage.</p> <p>IE (Comments):</p>

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	<p>Ireland welcomes the focus on the safeguarding and protection of cultural heritage from climate impacts.</p> <p>While culture’s role in “fostering a collective European identity” is important, we note that Europe’s strength lies in the diversity of cultures and identities contained within the union. Focusing on actions supporting a cohesive European identity should not come at the expense of actions supporting diverse cultural expression.</p> <p>While digitisation is one way to ensure preservation for future generations, Ireland recognises that there is strong need to foster a broad range of conservation skills to protect heritage. A wider focus on skills and training in the heritage sector would be welcomed.</p> <p>HR (Drafting suggestions):</p> <p>Europe's cultural heritage is a shared and priceless legacy facing budget constraints, natural and human-induced disasters, climate change, and regional conflicts. It is important to safeguard and preserve such a legacy, enhancing access and fostering a collective European identity. This includes strengthening the role of the audiovisual and media sectors in promoting and giving visibility to Europe’s heritage and cultural diversity. The Programme shall also pay particular attention to the situation of small and medium markets and linguistic communities, ensuring that heritage is accessible and represented across all Member States.</p> <p>Digital preservation further ensures that future generations can learn from, appreciate, and draw inspiration from their cultural heritage, while fostering innovation, education and new forms of audience engagement through digital and audiovisual media.</p> <p>HR (Comments):</p>

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	<p>Croatia welcomes the focus on safeguarding Europe’s cultural heritage but suggests:</p> <ul style="list-style-type: none"> • explicitly mentioning the audiovisual and media sectors as vehicles to preserve and promote heritage, • recognising the specific needs of smaller and linguistically diverse markets, <p>linking digital preservation not only to access but also to innovation, education and audience development, which are particularly valuable.</p> <p>FR (Drafting suggestions):</p> <p>Europe’s cultural heritage is a shared and priceless legacy facing budget constraints, natural and human-induced disasters, climate change, and regional conflicts. It is important to safeguard and preserve such a legacy, enhancing access and fostering a collective European identity. Ensuring open and inclusive access to cultural heritage, including through sustainable digitisation and appropriate training for heritage professionals, is equally essential to allow current and future generations to learn from, appreciate and draw inspiration from their cultural heritage.</p> <p>FR (Comments):</p> <p>In recital 9, a reference could be made to the need to ensure open and inclusive access to cultural heritage, including through sustainable digitisation and the training of heritage professionals.</p>
	<p>LV (Drafting suggestions):</p> <p><u>(9a) Cooperation projects, in particular small-scale projects, reflecting the diversity and specific needs of Europe’s cultural and creative sectors, should be at the core of the “Creative Europe - Culture strand”. To facilitate participation from smaller organisations, the Commission</u></p>

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	<p><u>should ensure simplification of application procedures for small-scale projects and allow higher co-financing rates</u></p> <p>LV (Comments): New recital proposal.</p>
<p>(10) The Programme should also give financial support to the European Heritage Label and the European Capitals of Culture actions, that celebrate and preserve Europe's rich cultural diversity and heritage, connecting it to the local level and contributing to culture-driven development strategies.</p>	<p>PL (Comments): We fully endorse the support for the European Heritage Label and the European Capitals of Culture actions. In our opinion, the Melina Mercouri Prize (awarded to European Capitals of Culture) should be expanded. Furthermore, beyond the initiatives mentioned above, the Creative Europe programme has supported many other valuable initiatives and benefits, such as the European Youth Orchestra and the Europa Nostra Award, which should also be continued.</p> <p>IT (Drafting suggestions): The Programme should also give financial support to the European Heritage Label and the European Capitals of Culture actions, that celebrate and preserve safeguard Europe's rich cultural diversity and heritage, connecting it to the local level and contributing to culture-driven development strategies.</p> <p>IE (Comments): Ireland welcomes specific reference to the continued financial support for European Heritage Label and European Capitals of Culture.</p> <p>Consideration should also be given to supporting, where appropriate, the Enlarged Partial Agreement on Cultural Routes of the Council of Europe, particularly in the context of the upcoming EU Strategy on Sustainable</p>

Commission proposal	Drafting suggestions and Comments
	<p>Tourism, which aims <i>inter alia</i> to support visitors in discovering lesser-known cultural routes and heritage sites across Europe.</p> <p>DE (Drafting suggestions):</p> <p>(10) The Programme should also give available financial support to the European Heritage Label and the European Capitals of Culture actions, that celebrate and preserve Europe's rich cultural diversity and heritage, connecting it to the local level and contributing to culture-driven development strategies.</p> <p>DE (Comments):</p> <p>The final budget for AgoraEU is subject to the negotiations for the Multiannual Financial Framework (MFF) 2028 – 2034. From GER's point of view, the overall MFF-volume, as suggested by the COM, is too high and horizontal cuts are necessary.</p> <p>Moreover, it remains unclear which plans the Commission has for the funding of other existing initiatives in the cultural sector (e.g. European Heritage Days). Is continued funding intended for these as well?</p> <p>AT (Comments):</p> <p>We welcome the references to financial support for ECOC and EHL. They should be explicitly mentioned in the article 5 on Culture as well.</p> <p>NL (Comments):</p> <p>The Netherlands is in favor of close alignment between the European Heritage Label on the one hand and the European Capital of Culture and European heritage awards on the other.</p>

Commission proposal	Drafting suggestions and Comments
<p>(11) Europe's media sectors hold a unique position in our democracies, culture, and economies. They encompass, inter alia, content such as films, series, video games, news and information, immersive reality and multimedia, as well as services including theatrical exhibition, television and radio broadcasting, print and online publishing, advertising online videos and podcasts. The digital transformation, notably the rise of artificial intelligence, has accelerated media convergence, changed consumer behaviour, disrupted business and revenue models, as well as intellectual property management and exploitation. The Union should therefore help the Union's media thrive, foster innovation and access to finance, promote cross fertilisation between news, audiovisual and other media sectors and support collaborations between different types of media entities across the Union.</p>	<p>RO (Drafting suggestions):</p> <p>This recital refers to Europe's media sectors, including news, audiovisual production, video games and a wide range of services. As essential pillars for democracy, culture and the economy, these sectors are deeply affected by digital transformation and the rise of artificial intelligence, which reshape business models and the management of intellectual property. The Union should therefore strengthen media access to innovation, financing and cross-border cooperation, explicitly recognising emerging media such as video games. The final formulation could be improved as follows: "...the Union should help media in the Union, [including emerging media], to thrive and innovate...".</p> <p>This recital also emphasises the need to support the media sector during accelerated technological change. European regulation is adapting to new realities, promoting consumer protection and innovation while safeguarding cultural diversity and Europe's economic interests in global competition. EU funding programmes such as MEDIA+ can help European content production and support small enterprises in adopting new technologies. Cross-sector cooperation (news, audiovisual, online media, etc.) can further stimulate innovation and create synergies across content types.</p> <p>IT (Comments):</p> <p>IT greatly appreciates the importance attributed to the news and information sector within the Media and Culture Framework, and the affirmation of their</p>

Commission proposal	Drafting suggestions and Comments
	<p>essential role in our democracies, cultures and economies. We firmly believe that the integrity of Europe's democratic framework and collective security are inextricably linked to the vitality of the news and information sector. Quality journalism plays a vital role in combatting the spread of misinformation, fostering community cohesion, promoting civic engagement, and ensuring governmental accountability. We therefore welcome the Union's efforts to foster innovation and facilitate access to finance of the news media, as well as any other activity that may contribute to the sector's financial viability.</p> <p>FR (Drafting suggestions):</p> <p>(11) Europe's media sectors hold a unique position in our democracies, culture, and economies. They encompass, inter alia, content such as films, series, video games, news and information, immersive reality and multimedia, as well as services including theatrical exhibition, television and radio broadcasting, print and online publishing, advertising online videos and podcasts. The digital transformation, notably the rise of artificial intelligence, has accelerated media convergence, changed consumer behaviour, disrupted business and revenue models, as well as intellectual property management and exploitation. The Union should therefore help the Union's media thrive, foster innovation and access to finance, promote cross-fertilisation between news, audiovisual and other media sectors and support collaborations between different types of media entities across the Union.</p> <p>FR (Comments):</p> <p>The term 'cross-fertilisation' is not sufficiently clear, particularly in a context where collaborations between different media entities are already mentioned; France therefore proposes to remove it.</p> <p>DE</p>

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	<p>(Drafting suggestions):</p> <p>(11) Europe's media sectors hold a unique position in our democracies, culture, and economies. They encompass, inter alia, content such as films, series, video games, news and information, immersive reality and multimedia, as well as services including theatrical exhibition, television and radio broadcasting, print and online publishing, advertising online videos and podcasts. The digital transformation, notably the rise of artificial intelligence, has accelerated media convergence, changed consumer behaviour, disrupted business and revenue models, as well as intellectual property management and exploitation. The Union should therefore not only support the sustainability and competitiveness of the sector, but help the Union's media thrive, foster innovation and access to finance, promote cross fertilisation between news, audiovisual and other media sectors and support collaborations between different types of media entities across the Union.</p> <p>DE (Comments): The continuous support of the sector remains one of the important priorities and should be mentioned alongside the other motives here.</p> <p>BE (Comments): What is meant with 'advertising online videos and podcasts'? And why are audio and video streaming not mentioned?</p> <p>AT (Comments): The definition of audiovisual and media sectors shouldn't be mixed, but dealt with separately. In AT film is part of culture policy and not media policy. Therefore the audiovisual sector needs to be added.</p>

Commission proposal	Drafting suggestions and Comments
<p>(12) The Union audiovisual sector faces challenges stemming from limited cross-border circulation, shifting consumption habits and the dominance of non-Union players. Given these challenges, Union intervention should support the capacity of European audiovisual and video games industries to create, finance, produce and disseminate European works on all platforms that are available and attractive to audiences within the Union and beyond. It should foster transmedia adaptations of intellectual property between different media formats, contribute to promoting collaboration among Member States with different market capacities, and accompany the Union’s audiovisual regulatory framework.</p>	<p>RO (Comments): The recital describes in general terms “the capacity to create, finance, produce and disseminate,” but does not mention human capital or technological adaptation. We support adding references to continuous training, mobility and professional networks as integral elements of EU support for the audiovisual and video game industries, recognising that professional development and mobility are essential for successful transmedia adaptation of intellectual property.</p> <p>FR (Drafting suggestions): The Union audiovisual sector faces challenges stemming from limited cross-border circulation, shifting consumption habits and the dominance of non-Union players. Given these challenges, Union intervention should support the capacity of European audiovisual and video games industries to create, finance, produce and disseminate European works, including heritage works, on all platforms via all distribution channels that are available and attractive to audiences within the Union and beyond, including theatrical exhibition. The MEDIA+ ‘Audiovisual’ sub-strand It should foster transmedia adaptations of intellectual property between different media formats, contribute to promoting collaboration among Member States with different market capacities, and accompany the Union’s audiovisual regulatory framework. <u>Its audiovisual production support should be dedicated to supporting independent production – that which presents no direct or indirect ties to audiovisual media services – and ensure that intellectual property rights remain mostly with European independent companies. As the market conditions and audiovisual operators continue to evolve, specific criteria to define what constitutes an independent production company should be provided in the context of the implementation of the Programme.</u></p>

Commission proposal	Drafting suggestions and Comments
	<p>FR (Comments):</p> <p>With regard to the first sentence, the French authorities do not share the view that cross-border circulation of works is limited; it has improved significantly in terms of both the number of non-national titles available and consumption. They consider that the sentence should instead highlight the increased tension in the audiovisual market due to increased competition and the dominance of non-European companies, the concentration of orders in the hands of a handful of players, and the lack of visibility of European works on online platforms.</p> <p>With regard to the second sentence, targeting the dissemination of European works on all ‘platforms’ is too narrow in that it seems to exclude television channels and cinemas in particular. Furthermore, it is essential to make reference to heritage works, which constitute a cultural treasure and are essential for democratic resilience of all Europeans.</p> <p>Furthermore, the French authorities would like the recital to reiterate the importance of directing funds allocated to audiovisual production towards independent production. In principle, independent production refers to the absence of a link or a distant link between the producer and the media service provider, whether the latter is a television channel or a video-on-demand platform. Because of this positioning, independent production is subject to a high level of risk: unlike broadcasters, independent producers do not have knowledge of their audiences, nor are they under pressure to satisfy them. In the overwhelming majority of cases, it is carried out by small European companies that do not have the financial backing of broadcasters; the variety of this production fabric and its low concentration are also factors contributing to cultural diversity.</p> <p>DE (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>Germany welcomes the recognition of the challenges the audiovisual sector is currently facing that have to be reflected in the MEDIA+ part of the programme.</p> <p>AT (Drafting suggestions):</p> <p>(12) The Union audiovisual sector faces challenges stemming from limited cross-border circulation, shifting consumption habits and the dominance of non-Union players. Given these challenges, Union intervention should support the capacity of European audiovisual <u>sector</u> and video games <u>industries</u> to create, finance, produce and disseminate European works on all platforms that are available and attractive to audiences within the Union and beyond. It should foster transmedia adaptations of intellectual property between different media formats, contribute to promoting collaboration among Member States with different market capacities, and accompany the Union’s audiovisual regulatory framework.</p> <p>NL (Comments):</p> <p>Recitals 11, 12, and also 38 point towards the existence of significant differences between the sectors covered by MEDIA PLUS. This consideration leads the Netherlands to request that the distinction between audiovisual sectors and newsmedia be made within MEDIA PLUS, creating separate budgets for these two sectors.</p>
<p>(13) News media outlets and journalists across the Union are under increased pressure, notably due to the rise of global online platforms, shifting consumption habits and growing spread of disinformation. These challenges impact news revenues and distribution, undermining the viability and public trust in news media outlets, and limiting citizens’ access to diverse, professionally produced European journalistic content. The Union should support a viable, independent and diverse information ecosystem, protect</p>	<p>RO (Drafting suggestions):</p> <p>This recital begins with a diagnosis (“news media and journalists in the Union face structural pressure”) and concludes with a public-policy direction: the Union must support a viable, independent and diverse information ecosystem. We strongly support anchoring this in</p>

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<p>journalists under threat, promote media freedom and pluralism, and reinforce the integrity of the information space, by promoting measures and enhancing cooperation aimed at tackling disinformation and supporting digital and media literacy, including for young people.</p>	<p>professional journalism standards and independent fact-checking infrastructures, which are central to the credibility and resilience of the information space. A suggested addition could read: "...to promote media freedom and pluralism and strengthen the integrity of the information space, [including through the promotion of professional journalism standards, editorial independence, media diversity and independent fact-checking mechanisms], by fostering cooperation and measures to counter disinformation and support media and digital literacy, including for young people."</p> <p>LV (Drafting suggestions):</p> <p>(13) News media outlets and journalists across the Union are under increased pressure, notably due to the rise of global online platforms, shifting consumption habits and growing spread of disinformation. These challenges impact news revenues and distribution, undermining the viability and public trust in news media outlets, and limiting citizens' access to diverse, professionally produced European journalistic content, <u>particularly at the local level, thereby increasing the risk of news deserts emerging.</u></p> <p><u>Additionally, local and small media service providers, which are essential for media pluralism and for ensuring access to local news, often face structural barriers in accessing funding and adapting to digital transformation.</u> The Union should support a viable, independent and diverse information ecosystem, protect journalists under threat, promote media freedom and pluralism, <u>including by taking into account the specific needs of local and small media service providers,</u> and reinforce the integrity of the information space by promoting measures and enhancing cooperation aimed at tackling disinformation and supporting digital and media literacy, including for young people.</p>

Commission proposal	Drafting suggestions and Comments
	<p>LV (Comments):</p> <p>Considering the fact that the media sector in Latvia and several other Member States is predominantly made up of micro and small enterprises, both in terms of the number of employees and revenue, Latvia calls on the Commission to reflect more clearly in the recitals the importance of media service providers and projects of different sizes, especially small-scale projects, in maintaining the diversity of the media ecosystem and ensuring the availability of local news. Despite their limited capacity, local and small media service providers, including regional media, ensure the diversity of the media ecosystem and the availability of reliable local news. At the same time, their capacity limits their ability to attract international funding, especially in cases where pre-financing or co-financing is required. Targeted support mechanisms would help small-scale media outlets to promote competitiveness and strengthen the ability to coexist with online platforms and digital content creators.</p> <p>In the case of media literacy, our experience shows that person-to-person approaches (such as mentor-based training, regional workshops, cooperation with local leaders) yield the strongest results. Therefore, it is important that EU support for media literacy initiatives is as accessible as possible to local and small organisations. Support for other actors such as academia is important as well.</p> <p>IT (Drafting suggestions):</p> <p>(13) News media outlets and journalists across the Union are under increased pressure, notably due to the rise of global online platforms, very large online search engines and the impact of artificial intelligence, shifting consumption habits and growing spread of disinformation. These challenges impact news revenues and distribution, undermining the viability and public trust in news media outlets, and limiting citizens' access to</p>

Commission proposal	Drafting suggestions and Comments
	<p>diverse, editorially independent and professionally produced European journalistic content. The Union should support a viable, independent and diverse information ecosystem, protect journalists under threat, promote media freedom and pluralism, and reinforce the integrity of the information space, by promoting measures and enhancing cooperation aimed at tackling disinformation and supporting digital and media literacy, including for young people.</p> <p>IT (Comments):</p> <p>IT is pleased with the key concepts expressed in this paragraph. However, it's not only (very large) online platforms that threaten the news media outlet viability, but also very large online search engines and providers of generative AI systems. IT thinks that we should stress their distinct role in the selection, distribution and dissemination of information. In particular, generative AI systems are increasingly permeating all stages of the news value chain, from selection and creation of the news content to distribution and monetization.</p> <p>IE (Drafting suggestions):</p> <p>News media outlets and journalists across the Union are under increased pressure, notably due to the rise of global online platforms, impact of artificial intelligence, shifting consumption habits and growing spread of disinformation. These challenges impact news revenues and distribution, undermining the viability and public trust in news media outlets, and limiting citizens' access to diverse, editorially independent and professionally produced European journalistic content.</p> <p>IE (Comments):</p>

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	<p>Ireland welcomes the inclusion of a new specific objective on News media in the Media+ strand of the programme, and the areas of focus under the objective, including protection of the professional news sector and media pluralism, which are particularly critical for independent local news media organisations, who are trusted sources of information for the public and face increasing pressures on their sustainability. In this regard, it will be critical that actions or measures under the News Media objective include targeted supports for smaller local media organisations that are key actors in helping to avoid ‘news deserts’ and that supports are not just focused on transnational actions that can most often benefit larger, and multinational media organisations. Measures to help safeguard the online environment and promote digitalisation and media literacy are equally important and welcome.</p> <p>BE (Drafting suggestions): <u>. The Union should support a viable, independent and diverse information ecosystem, protect journalists under threat, [safeguard/ensure media freedom and promote media pluralism] and reinforce the integrity of the information space, by promoting measures and enhancing cooperation aimed at tackling disinformation and supporting digital and media literacy, including for young people.</u></p> <p>BE (Comments): It seems appropriate to strengthen the phrasing of this paragraph by stating ‘safeguard/ensure media freedom and promote media pluralism’ instead of simply ‘promote media freedom’.</p> <p>NL (Drafting suggestions): Add: (13a) In line with Commission Recommendation (EU) 2022/758 and Directive (EU) 2024/1069, the Programme shall support preventive</p>

Commission proposal	Drafting suggestions and Comments
	<p>and remedial measures against strategic lawsuits against public participation (SLAPPs), including legal aid, capacity building and awareness raising for journalists, human rights defenders and civil society organisations. These actions shall be implemented in complementarity with the Justice Programme, ensuring a coherent and comprehensive implementation of EU framework against SLAPPs across the Union.”</p> <p>NL (Comments): NL requests adding a new paragraph as 13a.</p> <p>As currently drafted, only the Justice Programme explicitly covers anti-SLAPP measures. This could very likely hinder the proper implementation of the Commission Recommendation (EU) 2022/758 and create a structural gap: victims of SLAPPs may lack preventive, financial or organisational support. The absence of a coordination mechanism could also lead to fragmentation and inefficiencies - similar awareness raising or training actions could be submitted under both funding lines, creating confusion for applicants, evaluators and beneficiaries. To address these risks and ensure a comprehensive cost-neutral approach, NL, in line with the suggestions made by SLOV and its non-paper, proposes the following additions (13a) and amendments to</p> <p>SI (Drafting suggestions): After “<i>young people</i>” add “, and by supporting independent watchdog and fact-checking organisations at Union and national level.</p> <p>SI</p>

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	<p>(Comments):</p> <p>This follows the European Democracy Action Plan and the Digital Services Act, ensuring that independent watchdog and fact-checking organisations can be direct beneficiaries under AgoraMedia actions, thereby enhancing transparency and trust in the information space.”</p>
	<p>FR</p> <p>(Drafting suggestions):</p> <p>(13a) new In particular, the Union should support modernisation actions aimed at, for example, enabling and facilitating the use of AI technologies by news media, particularly for the purposes of research, information gathering and processing, or editorial assistance, but also to facilitate content tagging and attribution. Particular attention should also be paid to combating information deserts and to the structuring role of local media in promoting and maintaining democratic debate. In order to ensure the effectiveness of this support, these actions may also be carried out with actors established in a single Member State.</p> <p>FR</p> <p>(Comments):</p> <p>A reference should be added to measures encouraging the modernisation of news media. The programme should support these media in adapting to the rapid developments in the sector so that they are able to provide European citizens not only with reliable content but also with content that remains attractive. A dedicated recital should also be devoted to supporting local news media, which play a crucial role in ensuring access to reliable information.</p> <p>Considering the inherent national character of news products and services, as recognised by the Commission for the written news media market in different</p>

Commission proposal	Drafting suggestions and Comments
	<p>decisions, actions undertaken by actors established in a single Member State should be allowed.</p> <p>SI (Drafting suggestions):</p> <p>Add recital 13a: In line with Recommendation (EU) 2022/758 and Directive (EU) 2024/1704, the Programme shall support preventive and remedial measures against strategic lawsuits against public participation (SLAPPs), including legal aid, capacity-building and awareness-raising for journalists, human-rights defenders and civil-society organisations. These actions shall be implemented in complementarity with the Justice Programme, which supports judicial and procedural safeguards against SLAPPs, ensuring a coherent and comprehensive implementation of Directive (EU) 2024/1704.</p> <p>SI (Comments):</p> <p>Recital (13a) provides the interpretative and legal foundation for the new point (h) in Article 7, which introduces support for strategic-litigation defence and anti-SLAPP measures within the CERV+ strand. This addition ensures horizontal coherence between the <i>Justice</i> and <i>AgoraEU</i> Programmes in implementing Directive (EU) 2024/1704 on protecting persons who engage in public participation from abusive litigation (SLAPPs). The recital clarifies that <i>Justice</i> addresses the judicial and procedural dimension (civil-law and training measures), while <i>AgoraEU</i> covers the societal and preventive dimension (support for journalists, human-rights defenders and civil society). This division of labour avoids overlap, ensures complementarity, and enables a full-cycle approach to anti-SLAPP protection: <i>Justice safeguards the courtrooms, AgoraEU safeguards the public space.</i></p>
(14) Democracies in the Union are facing increasing challenges. Declining trust of citizens in democratic institutions and processes is exacerbated by	IT

AgoraEU proposal – template for the fifth consultation

From: RO, PL, LV, IT, IE, HR, FR, FI, EL, DE, CZ, BE, AT, HU, NL, SK, SI

Deadline: *11 December 2025 (18:00)*

Updated: 12/12/2025 09:56

Commission proposal	Drafting suggestions and Comments
<p>disinformation, social polarisation and hatred impacting the electoral and other democratic processes. A whole of society approach is needed to make European democracy more resilient.</p>	<p>(Drafting suggestions):</p> <p>(14) Democracies in the Union are facing increasing challenges. Declining trust of citizens in democratic institutions and processes is exacerbated by disinformation, social polarisation and hatred impacting the electoral and other democratic processes. A whole of society, rights-based approach is needed to make European democracy more resilient.</p> <p>IT</p> <p>(Comments):</p> <p>IT agrees that the main impact of disinformation is the declining trust of citizens in public institutions. To make our societies more resilient, media literacy activities are fundamental in the long term against disinformation because they build an individual's and society's resilience to manipulative and false information by equipping them with critical evaluation skills. The whole-of-society approach, in our opinion, can be considered a long-term, preventative strategy that goes beyond reactive measures like fact-checking</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>Democracies in the Union are facing increasing challenges. Declining trust of citizens in democratic institutions and processes is exacerbated by disinformation, social polarisation and hatred impacting the electoral and other democratic processes. A whole of society, rights-based approach is needed to make European democracy more resilient.</p> <p>IE</p> <p>(Comments):</p> <p>We strongly agree on the need for a whole of society approach to addressing the challenges set out in this recital. We believe in a rights-based approach, balancing effective protection with fundamental rights and freedoms.</p>

Commission proposal	Drafting suggestions and Comments
<p>(15) The protection and promotion of fundamental rights contributes to the construction of a more democratic Union. Non-discrimination is a core principle of the Union enshrined in Article 19 TFEU and in Article 21 of the Charter. Working towards an equal and discrimination-free society contributes to untapping the potential of individuals in their diversity and to cultural, economic and social growth. It also helps to address important root causes of violence against vulnerable groups, which in turn is a frontal attack on equality. Therefore, the Programme should promote actions to address all forms of discrimination and intolerance, namely direct and indirect discrimination, paying attention to the specific forms of structural and intersectional discrimination, with a view to supporting relevant Union policy frameworks. The Programme should support actions to prevent and combat all forms of xenophobia and racism, antisemitism and anti-Muslim hatred, homophobia, biphobia, transphobia, interphobia, intolerance and discrimination based on gender identity, intolerance towards persons belonging to minorities including Roma, as well as hate speech. The Programme should also contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities adopted on 13 December 2006⁶ to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities.</p> <hr/> <p>⁶ OJ L 23, 27.01.2010, p. 35-36</p>	<p>IE (Drafting suggestions):</p> <p>The protection and promotion of fundamental rights contributes to the construction of a more democratic Union. Non-discrimination is a core principle of the Union enshrined in Article 19 TFEU and in Article 21 of the Charter. Working towards an equal and discrimination-free society contributes to untapping the potential of individuals in their diversity and to cultural, economic and social growth. It also helps to address important root causes of gender based violence and violence against vulnerable groups, which in turn is a frontal attack on equality. Therefore, the Programme should promote actions to address all forms of discrimination and intolerance, namely direct and indirect discrimination, including gender discrimination, paying attention to the specific forms of structural and intersectional discrimination, with a view to advancing non-discrimination mainstreaming and supporting relevant Union policy frameworks. The Programme should support actions to prevent and combat all forms of xenophobia and racism, antisemitism and anti-Muslim hatred, homophobia, biphobia, transphobia, interphobia, intolerance and discrimination based on gender identity, intolerance towards persons belonging to minorities including Roma, as well as hate speech. The Programme should also contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities adopted on 13 December 2006 to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities.</p> <p>IE (Comments):</p> <p>This is welcome – but drafting suggestions here aim to better reflect the specific focus on gender equality, gender-based violence, and mainstreaming that currently features in CERV.</p>

Commission proposal	Drafting suggestions and Comments
	<p>DE (Drafting suggestions):</p> <p>(15) The protection and promotion of fundamental rights contributes to the construction of a more democratic Union. Non-discrimination and equality are is-a core principles of the Union enshrined in Articles 8 and 19 TFEU and in Articles 21 and 23 of the Charter. Working towards an equal and discrimination-free society contributes to untapping the potential of individuals in their diversity and to cultural, economic and social growth. It also helps to address important root causes of violence against vulnerable groups, which in turn is a frontal attack on equality. Therefore, the Programme should promote actions to address all forms of discrimination and intolerance, namely direct and indirect discrimination, paying attention to the specific forms of structural and intersectional discrimination, with a view to supporting relevant Union policy frameworks. The Programme should support actions to prevent and combat all forms of xenophobia and racism, antisemitism, hatred against religious beliefs and anti-Muslim hatred, homophobia, biphobia, transphobia, interphobia, intolerance and discrimination based on gender identity, intolerance towards persons belonging to minorities including Roma, as well as hate speech. The Programme should also contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities adopted on 13 December 2006 to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities.</p> <p>DE (Comments):</p> <p>Article 8 TFEU and Article 23 of the Charter are also relevant because they address gender equality. The previous Creative Europe Regulation</p>

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	<p>(Regulation 2021/818) also cited Article 23. And: The terms “equal” and “equality” are already in use in the following lines.</p> <p>The programme should be directed against hatred based on religious beliefs in general.</p> <p>It should be avoided to explicitly mention - and therefore single out - some minorities while forgetting to mention others.</p> <p>AT (Comments): We support that intersecional discrimination is explicitly mentioned. However we would like to already raise awareness that the wordings “vulnerable groups” should be used with caution</p> <p>HU (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The protection and promotion of fundamental rights contributes to the construction of a more democratic Union. Non-discrimination is a core principle of the Union enshrined in Article 19 TFEU and in Article 21 of the Charter. Working towards an equal and discrimination-free society contributes to untapping the potential of individuals in diverse situations and conditions their diversity and to cultural, economic and social growth. It also helps to address important root causes of violence against vulnerable groups, which in turn is a frontal attack on equality. Therefore, the Programme should promote actions to address all forms of discrimination and intolerance, namely direct and indirect discrimination, paying attention to the specific forms of structural and intersectional discrimination, with a view to supporting relevant Union policy frameworks. The Programme should support actions to prevent and combat all forms of xenophobia and racism, antisemitism, and anti-Muslim and anti-Christian hatred, homophobia, biphobia, transphobia, interphobia, intolerance and discrimination based on sexual orientation and gender identity, intolerance towards persons belonging to national or ethnic minorities including Roma, as well as hate speech. The Programme should also contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities adopted on 13 December 2006^C to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities.</p> <p>HU (Comments):</p> <p>Hungary interprets the concept of gender on a binary basis. The use of the expression 'individuals in their diversity' allows for a broader interpretation of the concept of gender instead of which Hungary prefers to use the expression 'in diverse situations and conditions'.</p>

^C OJ L 23, 27.01.2010, p. 35-36

Commission proposal	Drafting suggestions and Comments
	<p>Seeing the numerous and hateful anti-Christian acts in the European Union, we believe that it is also necessary to fight against anti-Christianity. Instead of a list, we prefer a blanket reference by the agreed language “sexual orientation and gender identity” to address the discrimination against these groups. Moreover, the concept of minorities needs to be made more explicit by referring to “national or ethnic”</p> <p>NL (Drafting suggestions):</p> <p>(15) The protection and promotion of fundamental rights contributes to the construction of a more democratic Union. Non-discrimination is a core principle of the Union enshrined in Article 19 TFEU and in Article 21 of the Charter. Working towards an equal and discrimination-free society contributes to untapping the potential of individuals in their diversity and to cultural, economic and social growth. It also helps to address important root causes of violence against vulnerable groups, which in turn is a frontal attack on equality. Therefore, the Programme should promote actions to address all forms of discrimination and intolerance, namely direct and indirect discrimination, paying attention to the specific forms of structural and intersectional discrimination, with a view to supporting relevant Union policy frameworks. The Programme should support actions to prevent and combat all forms of xenophobia and racism, antisemitism and anti-Muslim hatred, lesbophobia, homophobia, biphobia, transphobia, interphobia, intolerance and discrimination based on gender identity, intolerance towards persons belonging to minorities including Roma, as well as hate speech. The Programme should also contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons</p>

Commission proposal	Drafting suggestions and Comments
	<p>with Disabilities adopted on 13 December 2006 to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities.</p> <p>NL (Comments):</p> <p>NL requests adding ‘lesbophobia’ to the list. Lesbophobia reflects the intersection of sexism and homophobia and results in specific patterns of discrimination that are not captured by the broader term ‘homophobia.’ Coherently with the mention of other forms of LGBTI-phobia, including lesbophobia would allow to address the persistent violence and exclusion faced by persons that are or are perceived as LBQ women. Explicitly naming lesbophobia strengthens the inclusiveness of the Programme and ensures compliance with the Charter of Fundamental Rights and the Union’s equality commitments.</p>
<p>(16) The rights to privacy and the protection of personal data, enshrined respectively in Article 7 of the Charter and in Article 16 TFEU and Article 8 of the Charter, are enforced through a dedicated Regulation⁷ and Directive⁸. The Union’s legal framework lays down provisions to ensure that the right to protection of personal data is effectively protected. These legal instruments entrust the national data protection supervisory authorities with the task of promoting public awareness and understanding the risks, rules, safeguards and rights in relation to the processing of personal data. The Programme should contribute to raising awareness, carry out studies and other relevant activities in this field, including through the national data protection supervisory authorities, given the importance of the right to the protection of personal data in times of rapid technological developments.</p> <p>⁷ OJ L 119, 4.5.2016, p. 1-88.</p>	<p>IT (Drafting suggestions):</p> <p>(16) The rights to privacy and the protection of personal data, enshrined respectively in Article 7 of the Charter and in Article 16 TFEU and Article 8 of the Charter, are enforced through a dedicated Regulation⁷ and Directive⁸. The Union’s legal framework lays down provisions to ensure that the right to protection of personal data is effectively protected. These legal instruments entrust the national data protection supervisory authorities with the task of promoting public awareness and understanding the risks, rules, safeguards and rights in relation to the processing of personal data. The Programme should contribute to raising awareness, carry out studies and other relevant activities in this field, including through the national data protection supervisory authorities, given the importance of the right to the protection of personal data in times of rapid technological developments. The right to freedom of expression and respect for the freedom and pluralism of the</p>

Commission proposal	Drafting suggestions and Comments
<p>8 OJ L 119, 4.5.2016, p. 89-131.</p>	<p>media, protected by Article 11 of the Charter, provide a necessary foundation for democratic life in the Union. Article 3 of the European Media Freedom Act built on the Charter and requires Members States to respect the right of people to have access to a plurality of editorially independent media content. In address the challenges facing the European media sector, the Programme should also promote and support media freedom and plurality and ensure the protection of the fundamental right to freedom of expression and information.</p> <p>IT (Comments):</p> <p>IT supports tyhe drafting suggestion from IE, adding a reference to art.11 of the Charter</p> <p>IE (Drafting suggestions):</p> <p>(16) The rights to privacy and the protection of personal data, enshrined respectively in Article 7 of the Charter and in Article 16 TFEU and Article 8 of the Charter, are enforced through a dedicated Regulation and Directive . The Union’s legal framework lays down provisions to ensure that the right to protection of personal data is effectively protected. These legal instruments entrust the national data protection supervisory authorities with the task of promoting public awareness and understanding the risks, rules, safeguards and rights in relation to the processing of personal data. The Programme should contribute to raising awareness, carry out studies and other relevant activities in this field, including through the national data protection supervisory authorities, given the importance of the right to the protection of personal data in times of rapid technological developments.</p> <p>‘The right to freedom of expression and respect for the freedom and pluralism of the media, protected by Article 11 of the Charter, provide a necessary foundation for democratic life in the Union. Article 3 of the</p>

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	<p>European Media Freedom Act built on the Charter and requires Members States to respect the right of people to have access to a plurality of editorially independent media content. In address the challenges facing the European media sector, the Programme should also promote and support media freedom and plurality and ensure the protection fo the fundamental right to freedom of expression and information</p> <p>IE (Comments):</p> <p>Ireland welcomes the references to fundamental rights. Given the importance role of the media in vindicating the Article 11 CFREU rights to freedom of expression and information it would useful to incorporate a reference in the recitals, noting also the further right set out in Article 3 EMFA to ‘access to a plurality of editorially independent media content’.</p> <p>FR (Drafting suggestions):</p> <p>The rights to privacy and the protection of personal data, enshrined respectively in Article 7 of the Charter and in Article 16 TFEU and Article 8 of the Charter, are enforced through a dedicated Regulation⁷ and Directive⁸. The Union’s legal framework lays down provisions to ensure that the right to protection of personal data is effectively protected. These legal instruments entrust the national data protection supervisory authorities with the task of promoting public awareness and understanding the risks, rules, safeguards and rights in relation to the processing of personal data. The Programme should contribute to raising awareness, carry out studies and other relevant activities in this field, including through the national data protection supervisory authorities, given the importance of the right to the protection of personal data in times of rapid technological developments. The Programme should also contribute to strengthening the digital literacy of European citizens and</p>

Commission proposal	Drafting suggestions and Comments
	<p>to promoting the ethical and responsible use of data and artificial intelligence in the cultural and media sectors.</p> <p>FR (Comments):</p> <p>In recital 16, France suggests adding a reference to the need for the programme to contribute to strengthening the digital literacy of European citizens and to promoting the ethical and responsible use of data and artificial intelligence in the cultural and media sectors.</p>
	<p>FR (Drafting suggestions):</p> <p>(16a) Children are fully-fledged holders of rights and protection and promotion of the rights of the child, including child participation, is a key objective of the European Union.</p> <p>Article 3 TEU requires the Union, inter alia, to promote the protection of the rights of the child, in line with Article 24 of the Charter and with the United Nations Convention on the Rights of the Child.</p> <p>FR (Comments):</p> <p>The French delegation would like to add a recital concerning the promotion and protection of children’s rights in the context of the implementation of the CERV Programme and the “CHILD” priorities. This addition will serve to reflect paragraph (d) of Article 7 of the draft Agora EU Regulation, which is not highlighted in the recitals.</p>
<p>(17) Gender equality is a fundamental right and an objective of the Union and should be supported by the Programme. Despite many achievements, significant challenges remain, which require to reinforce the Union’s commitment. This includes working towards freedom from gender-based</p>	<p>FR (Drafting suggestions):</p> <p>(17) Gender equality is a fundamental right and an objective of the Union and should be supported by the Programme. Despite many achievements,</p>

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<p>violence, the highest standards of health, including in particular sexual and reproductive health, equal pay and economic empowerment, work-life balance and care, equal employment, career opportunities and working conditions, quality and inclusive education, political participation and equal representation, institutional mechanisms that deliver on women’s rights, actively tackling gender stereotypes and addressing intersectional discrimination.</p>	<p>significant challenges remain, which require to reinforce the Union’s commitment. This includes working towards freedom from gender-based violence, the highest standards of health and rights, including in particular sexual and reproductive health, equal pay and economic empowerment, work-life balance and care, equal employment, career opportunities and working conditions, quality and inclusive education, political participation and equal representation, institutional mechanisms that deliver on women’s rights, actively tackling gender stereotypes and addressing intersectional discrimination.</p> <p>FR (Comments):</p> <p>As in the current CERV Regulation (see Recital 12), it is important to ensure the inclusion of the full spectrum of ‘sexual and reproductive health and rights’.</p> <p>FI (Drafting suggestions):</p> <p>(17) Gender equality is a fundamental right and an objective of the Union and should be supported by the Programme. Despite many achievements, significant challenges remain, which require to reinforce the Union’s commitment. This includes working towards freedom from gender-based violence, the highest standards of health, including in particular sexual and reproductive health and rights, equal pay and economic empowerment, work-life balance and equal sharing of care responsibilities between women and men, equal employment, career opportunities and working conditions, quality and inclusive education, political participation and equal representation, institutional mechanisms that deliver on women’s rights, actively tackling gender stereotypes and addressing intersectional discrimination. The promotion of gender equality and gender mainstreaming in all activities of the Union is therefore a core task for the Union, and should be supported by the Programme.</p>

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	<p>FI (Comments): We suggest using the term "sexual and reproductive health and rights", in line with the Roadmap for Women's Rights, which sets the long-term principles and objectives of the EU in gender equality.</p> <p>We suggest adding "equal sharing of care responsibilities between women and men" as an objective ("care" as such remains an abstract concept in this context)</p> <p>We suggest adding the reference to the active promotion of gender equality and gender mainstreaming. It is important to refer to gender mainstreaming in the recitals and to explain the concept, as gender mainstreaming is part of the article 7. The sentence "and should be supported by the Programme" could be mentioned either in the beginning or in the end of the article.</p> <p>EL (Drafting suggestions): Gender equality is a fundamental right and an objective of the Union and should be supported promoted and mainstreamed by the Programme. Despite many achievements, significant challenges remain, which require to reinforce the Union's commitment. This includes working towards freedom from gender-based violence, the highest standards of health, including in particular sexual and reproductive health and rights, equal pay and economic empowerment, work-life balance and care, equal employment, career opportunities and working conditions, quality and inclusive education, political participation and equal representation, institutional mechanisms that deliver on women's rights, actively tackling gender stereotypes and addressing intersectional discrimination.</p> <p>EL</p>

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	<p>(Comments):</p> <p>The use of the stronger verbs “promoted and mainstreamed” adds an operational commitment to gender mainstreaming across all strands, in line with EU Gender Equality Strategy and the Roadmap for Women’s Rights.</p> <p>The addition of the word “rights” is in line with the Roadmap for Women’s Rights</p> <p>AT</p> <p>(Comments):</p> <p>We welcome that sexual and reproductive health and intersectional discrimination are explicitly mentioned.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>17) Gender equality is a fundamental right and an objective of the Union and should be supported by the Programme. Despite many achievements, significant challenges remain, which require to reinforce the Union’s commitment. This includes working towards freedom from gender-based violence, the highest standards of health, including in particular sexual and reproductive health and rights, equal pay and economic empowerment, work-life balance and care, equal employment, career opportunities and working conditions, quality and inclusive education, political participation and equal representation, institutional mechanisms that deliver on women’s rights, actively tackling gender stereotypes and addressing intersectional discrimination.</p> <p>NL</p> <p>(Comments):</p> <p>NL requests adding “rights”.</p>

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	<p>As in the current CERV Regulation (see Recital 12), it is crucial to ensure the inclusion of the full spectrum of ‘sexual and reproductive health and rights’. Activities carried out to defend and advance sexual and reproductive rights must continue to be supported by CERV+, as fundamental human rights essential to gender equality.</p> <p>SI (Drafting suggestions):</p> <p>Gender equality is a fundamental right and an objective of the Union and should be supported by the Programme. The Programme shall mainstream gender equality across all its strands and ensure a dedicated budget line under the CERV+ strand...</p> <p>SI (Comments):</p> <p>This amendment is legally consistent with Article 8 TFEU, which obliges the Union to promote equality between women and men in all its activities, and aligns with the Commission’s guidance on gender budgeting (SEC (2024) 195 final). Establishing a dedicated budget line ensures traceability of expenditure related to gender equality and facilitates ex-post evaluation of gender-mainstreaming measures.</p>
<p>(18) Gender-based violence and violence against women, children, young persons and other groups at risk, such as LGBTIQ persons and persons with disabilities, constitute a serious violation of fundamental rights and continue to persist throughout the Union, in all social and economic contexts. Violence against women and persons belonging to other groups at risk is a violation of human rights and a frontal attack on equality. Thus, preventing and addressing such violence is a societal imperative and contributes to tackling such discrimination as well as addressing the impacts of violence, including on health. At the same time, ensuring a discrimination-free society will also help address the root causes of violence against vulnerable groups, since they are</p>	<p>RO (Drafting suggestions):</p> <p>This recital anticipates AgoraEU’s contribution to addressing gender-based violence and violence against women, children, young people, LGBTIQ persons and persons with disabilities. As women with disabilities face heightened risks of gender-based violence and social exclusion, we consider it appropriate to include a specific reference to this group. A suitable amendment could read: “gender-based violence</p>

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<p>intrinsically linked. Therefore, the Programme should continue the longstanding Union effort in preventing, responding to and fighting violence at all levels as well as in protecting and supporting all direct and indirect victims and survivors of violence, building on the five consecutive generations of the Daphne programme and strand⁹. The Programme should support the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women adopted in Istanbul on 11 May 2011, the implementation of the Commission Recommendation on developing and strengthening integrated child protection systems in the best interests of the child¹⁰, which protects children from any form of violence, as well as contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities, which protects persons with disabilities against any form of exploitation, violence and abuse.</p> <hr/> <p>⁹ Three consecutive generations of the Daphne programme (OJ L 34. 9.2.2000, p. 1; OJ L 143. 30.4.2004, p. 1; OJ L 173, 3.7.2007, p. 19–26), and the results of the Daphne strands of the Rights, Equality and Citizenship Programme (OJ L 354, 28.12.2013, p. 62–72) and the CERV Programme (OJ L 156, 5.5.2021, p. 1–20).</p> <p>¹⁰ C(2024) 2680 final (OJ L, 2024/1238, 14.5.2024, ELI: http://data.europa.eu/eli/reco/2024/1238/oj).</p>	<p>and violence against women[, including women with disabilities, violence against] children, young people...”.</p> <p>FR (Drafting suggestions):</p> <p>Gender-based violence and violence against women, children, young persons and other groups at risk, such as LGBTIQ persons and persons with disabilities, constitute a serious violation of fundamental rights and continue to persist throughout the Union, in all social and economic contexts. Violence against women and persons belonging to other groups at risk is a violation of human rights and a frontal attack on equality. Thus, preventing and addressing such violence is a societal imperative and contributes to tackling such discrimination as well as addressing the impacts of violence, including on health. At the same time, ensuring a discrimination-free society will also help address the root causes of violence against vulnerable groups, since they are intrinsically linked. Therefore, the Programme should continue the longstanding Union effort in preventing, responding to and fighting violence at all levels as well as in protecting and supporting all direct and indirect victims and survivors of violence, building on the five consecutive generations of the Daphne programme and strand⁹. The Programme should support the achievement of the objectives of Directive 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence and the Council of Europe Convention on preventing and combating violence against women adopted in Istanbul on 11 May 2011, the implementation of the Commission Recommendation on developing and strengthening integrated child protection systems in the best interests of the child¹⁰, which protects children from any form of violence, as well as contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities, which protects persons with disabilities against any form of exploitation, violence and abuse.</p> <p>FR</p>

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	<p>(Comments):</p> <p>In recital 18, in line with what has already been raised previously, the French delegation asks for the addition of the implementation of Directive 2024/1385 on combating violence against women and domestic violence as an objective of the programme.</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(18) Gender-based violence and violence against women, children, young persons and other groups at risk, such as LGBTIQ persons and persons with disabilities, constitute a serious violation of fundamental rights and continue to persist throughout the Union, in all social and economic contexts. Violence against women and persons belonging to other groups at risk is a violation of human rights and a frontal attack on equality. Thus, preventing and addressing such violence is a societal imperative and contributes to tackling such discrimination as well as addressing the impacts of violence, including on health. At the same time, ensuring a discrimination-free society will also help address the root causes of violence against vulnerable groups, since they are intrinsically linked. Therefore, the Programme should continue the longstanding Union effort in preventing, responding to and fighting violence at all levels as well as in protecting and supporting all direct and indirect victims and survivors of violence, building on the five consecutive generations of the Daphne programme and strand^D. The Programme should support the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women adopted in Istanbul on 11 May 2011, the implementation of the Commission Recommendation on developing and strengthening integrated child protection systems in the best interests of the child^E, which protects children</p>

^D Three consecutive generations of the Daphne programme ([OJ L 34, 9.2.2000, p. 1](#); [OJ L 143, 30.4.2004, p. 1](#); OJ L 173, 3.7.2007, p. 19–26), and the results of the Daphne strands of the Rights, Equality and Citizenship Programme (OJ L 354, 28.12.2013, p. 62–72) and the CERV Programme (OJ L 156, 5.5.2021, p. 1–20).

^E C(2024) 2680 final (OJ L, 2024/1238, 14.5.2024, ELI: <http://data.europa.eu/eli/reco/2024/1238/oj>).

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	<p>from any form of violence, the EU Directive on combating violence against women and domestic violence, as well as contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities, which protects persons with disabilities against any form of exploitation, violence and abuse.</p> <p>FI (Comments): We suggest adding the reference to the EU directive on combating violence against women and domestic violence as it is central element, together with Istanbul Convention, to combat gender-based violence in the EU.</p> <p>EL (Comments): We suggest to somehow also include an explicit reference to the Directive (EU) 2024/1385</p> <p>DE (Drafting suggestions): (18) Gender-based violence and violence against women, children, young persons and other groups at risk, such as LGBTIQ persons and persons with disabilities, constitute a serious violation of fundamental rights and continue to persist throughout the Union, in all social and economic contexts. Violence against women and persons belonging to other groups at risk is a violation of human rights and a frontal attack on equality. Thus, preventing and addressing such violence is a societal imperative and contributes to tackling such discrimination as well as addressing the impacts of violence, including on health. At the same time, ensuring a discrimination-free society will also help address the root causes of violence against vulnerable groups, since they are intrinsically linked. Therefore, the Programme should continue the longstanding Union effort in preventing, responding to and fighting</p>

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	<p>violence at all levels as well as in protecting and supporting all direct and indirect victims and survivors of violence, building on the five consecutive generations of the Daphne programme and strand . The Programme should support the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women adopted in Istanbul on 11 May 2011, the implementation of the Commission Recommendation on developing and strengthening integrated child protection systems in the best interests of the child , which protects children from any form of violence, as well as contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities, which protects persons with disabilities against any form of exploitation, violence and abuse.</p> <p>DE (Comments): The deletion serves to avoid duplication with the phrase "gender-based violence".</p> <p>AT (Comments): It is suggested to include a reference to DIRECTIVE (EU) 2024/1385 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 May 2024 on combating violence against women and domestic violence. As the first European legal instrument specifically addressing violence against women and domestic violence, this Directive represents a significant legislative milestone.</p> <p>HU (Drafting suggestions): Gender-based violence and violence against women, children, young persons and other groups at risk, such as LGBTIQ persons and persons with</p>

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	<p>disabilities, constitute a serious violation of fundamental rights and continue to persist throughout the Union, in all social and economic contexts. [...]</p> <p>The Programme support the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women adopted in Istanbul on 11 May 2011 to which the EU has only acceded as regards the matters falling within the exclusive competence of the Union, namely insofar as the relevant provisions of the Convention may affect common rules or alter their scope.</p> <p>HU (Comments):</p> <p>First of all, the Fundamental Law of Hungary only recognises two genders, second of all, the agreed language within the Council is “LGBTI” without the “Q”. Therefore the term LGBTIQ is unacceptable to us. Regarding the Istanbul Convention, we would like to insert the agreed language found in recital (6) of <i>Council Decision (EU) 2023/1075 of 1 June 2023 on the conclusion, on behalf of the European Union, of the Council of Europe Convention on preventing and combating violence against women and domestic violence with regard to institutions and public administration of the Union</i>. This reference may also be placed in a footnote.</p> <p>NL (Drafting suggestions):</p> <p>(18) Gender-based violence and violence against women, children, young persons and other groups at risk, such as LGBTIQ persons and persons with disabilities, constitute a serious violation of fundamental rights and continue to persist throughout the Union, in all social and economic contexts. [...]</p> <p>Preventing and addressing such violence requires sustained support for women's rights organisations and women's specialist services, which serve as frontline responders across Member States and possess the specialised expertise necessary to tackle the root causes and manifestations of gender-based violence. The Programme should support</p>

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	<p>the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women adopted in Istanbul on 11 May 2011, the implementation of the Commission Recommendation on developing and strengthening integrated child protection systems in the best interests of the child 18, which protects children from any form of violence, the EU Directive on combating violence against women and domestic violence, as well as contribute to enabling the Union to deliver on the commitment taken as Party to the UN Convention on the Rights of Persons with Disabilities, which protects persons with disabilities against any form of exploitation, violence and abuse.</p> <p>NL (Comments):</p> <p>The EU Directive on combating violence against women and domestic violence is a groundbreaking Directive, which contains many key provisions to prevent and criminalise certain forms of gender-based violence, protect and support victims and ensure their access to justice. The CERV+ strand must support the implementation of the Directive at the national level. The Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), in its mid-term horizontal review, has consistently identified women's specialist services as the most effective and best-equipped actors to prevent and tackle gender-based violence, emphasising that adequate and sustainable funding for these organisations is a fundamental requirement under the Istanbul Convention (Articles 8 and 9). GREVIO has warned that without dedicated support for specialist women's organisations, States risk diluting the gender-specific expertise essential for effective implementation.</p> <p>As the Union advances implementation of both the Istanbul Convention and the new EU Directive, it is essential to reinforce the role of women's organisations and ensure effective coordination of services supporting survivors of gender-based violence.</p> <p>SI</p>

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	<p>(Drafting suggestions):</p> <p>Add at the end: “Actions under this recital shall be implemented in line with Directive (EU) 2024/1385 on combating violence against women and domestic violence.”</p> <p>SI</p> <p>(Comments):</p> <p>This amendment provides an updated factual and legal link to the Directive (EU) 2024/1385, which entered into force on 4 June 2024. The explicit reference ensures that AgoraEU’s Daphne actions are fully aligned with binding Union law and the Council of Europe Istanbul Convention, thereby avoiding potential definitional inconsistencies concerning the notions of “victim” and “perpetrator.” It also enhances legal certainty for implementing authorities and beneficiaries across Member States.</p>
<p>(19) In accordance with Union acquis on equal treatment, the Member States have set up independent bodies for the promotion of equal treatment (‘equality bodies’), which play a key role in promoting equality and ensuring the effective application of equal treatment legislation. Further, the Programme should support the European Network of Equality Bodies (Equinet) composed of the national equality bodies as provided for by Council Directive (EU) 2024/1499¹¹ and Directive (EU) 2024/1500 of the European Parliament and of the Council¹², since Equinet is the only entity which ensures coordination of activities between equality bodies. This is of key importance for the effective implementation of Union anti-discrimination law in the Member States.</p>	<p>FI</p> <p>(Drafting suggestions):</p> <p>(19) In accordance with Union acquis on equal treatment, the Member States have set up independent bodies for the promotion of equal treatment (‘equality bodies’), which play a key role in promoting equality, including gender equality, and ensuring the effective application of equal treatment legislation. Further, the Programme should support the European Network of Equality Bodies (Equinet) composed of the national equality bodies as provided for by Council Directive (EU) 2024/1499^F and Directive (EU)</p>

^F Council Directive (EU) 2024/1499 of 7 May 2024 on standards for equality bodies in the field of equal treatment between persons irrespective of their racial or ethnic origin, equal treatment in matters of employment and occupation between persons irrespective of their religion or belief, disability, age or sexual orientation, equal treatment between women and men in matters of social security and in the access to and supply of goods and services, and amending Directives 2000/43/EC and 2004/113/EC (OJ L, 2024/1499, 29.5.2024, ELI: <http://data.europa.eu/eli/dir/2024/1499/oj>).

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<p>11 Council Directive (EU) 2024/1499 of 7 May 2024 on standards for equality bodies in the field of equal treatment between persons irrespective of their racial or ethnic origin, equal treatment in matters of employment and occupation between persons irrespective of their religion or belief, disability, age or sexual orientation, equal treatment between women and men in matters of social security and in the access to and supply of goods and services, and amending Directives 2000/43/EC and 2004/113/EC (OJ L, 2024/1499, 29.5.2024, ELI: http://data.europa.eu/eli/dir/2024/1499/oj).</p> <p>12 Directive (EU) 2024/1500 of the European Parliament and of the Council of 14 May 2024 on standards for equality bodies in the field of equal treatment and equal opportunities between women and men in matters of employment and occupation, and amending Directives 2006/54/EC and 2010/41/EU (OJ L, 2024/1500, 29.5.2024, ELI: http://data.europa.eu/eli/dir/2024/1500/oj).</p>	<p>2024/1500 of the European Parliament and of the Council^G, since Equinet is the only entity which ensures coordination of activities between equality bodies. This is of key importance for the effective implementation of Union anti-discrimination law in the Member States.</p> <p>FI (Comments): We suggest adding "including gender equality," to point out that gender equality is included in the mandate of equality bodies.</p> <p>SI (Drafting suggestions): Add at the end: “The Programme shall also foster capacity-building for equality bodies and facilitate exchange with civil-society organisations.”</p> <p>SI (Comments): Grounded in Commission Recommendation (2023/2821) on standards for equality bodies. It formalises cooperation with CSOs, reinforcing multi-actor enforcement mechanisms and ensuring coherent implementation of equality law across Member States.</p>
<p>(20) Citizens throughout the Union, many of whom regularly or at least occasionally travel to, live, study, work or volunteer in another Member State, should feel able to enjoy and exercise their citizenship rights and to place their trust in equal access, full enforceability and protection of their rights without any discrimination, no matter where in the Union they happen to be. Citizens should be more aware of their rights deriving from citizenship of the Union,</p>	<p>RO (Drafting suggestions): This recital highlights equal and non-discriminatory access to rights derived from EU citizenship. We note that young EU citizens belonging to diaspora communities within the Union often face obstacles in accessing opportunities, as eligibility criteria are tied</p>

^G Directive (EU) 2024/1500 of the European Parliament and of the Council of 14 May 2024 on standards for equality bodies in the field of equal treatment and equal opportunities between women and men in matters of employment and occupation, and amending Directives 2006/54/EC and 2010/41/EU (OJ L, 2024/1500, 29.5.2024, ELI: <http://data.europa.eu/eli/dir/2024/1500/oj>).

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<p>namely their right to move and reside freely in the Union, their voting rights when residing in another Member State, their right to petition the European Parliament in any of the official languages, their right to submit citizens' initiatives and their right to lodge complaints with the European ombudsman against institutional maladministration.</p>	<p>either to the country of origin or to the host country. To stimulate access to AgoraEU projects, we propose replacing “should feel that they have the possibility to enjoy their rights...” with “should be encouraged and enabled to enjoy their rights...”.</p> <p>DE (Comments):</p> <p>Unlike in the current CERV programme, the EU Commission's proposal makes no mention of exchanges between citizens of different Member States. These exchanges are currently included in one of the four existing CERV strands (‘Citizens' engagement and participation’). In practice, this aspect is implemented through municipal partnerships (town twinning), municipal networks and citizen encounters. In the new AgoraEU programme, this aspect could be included either in Article 9, ‘Democratic participation and rule of law’, or in Article 7, ‘Rights, equality, citizens and civil society’.</p>
<p>(21) Encouraging citizens to play a more active role in democracy at Union level will strengthen European civil society and foster the development of a European identity. Civil society therefore needs to be supported in promoting, safeguarding and raising awareness of Union values and in contributing to the effective enjoyment of rights under Union law. When Union citizens participate in the democratic life of the Union, they contribute to making a reality representative democracy, a principle on which the functioning of the Union is founded and which gives concrete expression to the value of democracy enshrined in Article 2 TEU.</p>	<p>RO (Comments):</p> <p>We support adding a reference to stimulating the participation of young EU citizens, particularly those belonging to diaspora communities, in democratic life through civic education, public debate and participatory tools. Currently, participation and eligibility opportunities are often difficult to access, limiting engagement in transnational initiatives and reducing the potential impact of democratic participation measures.</p> <p>IE (Drafting suggestions):</p> <p>Encouraging citizens to play a more active role in democracy at Union level will strengthen European civil society and foster the development of a European identity. Civil society therefore needs to be supported and</p>

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	<p>empowered in promoting, safeguarding and raising awareness of Union values and in contributing to the effective enjoyment of rights under Union law. When Union citizens participate in the democratic life of the Union, they contribute to making a reality representative democracy, a principle on which the functioning of the Union is founded and which gives concrete expression to the value of democracy enshrined in Article 2 TEU</p> <p>IE (Comments): This recital and the two which follow on civil society and citizen engagement are critically important. We welcome the recognition of the indispensable role played by civil society in promoting, safeguarding and raising awareness of the Union’s values.</p> <p>DE (Comments): See comment on recital 20 above.</p> <p>AT (Drafting suggestions): (21) Encouraging citizens, <u>particularly young people</u>, to play a more active role in democracy at Union level will strengthen European civil society and foster the development of a European identity. Civil society therefore needs to be supported in promoting, safeguarding and raising awareness of Union values and in contributing to the effective enjoyment of rights under Union law. When Union citizens participate in the democratic life of the Union, they contribute to making a reality representative democracy, a principle on which the functioning of the Union is founded and which gives concrete expression to the value of democracy enshrined in Article 2 TEU. <u>(21a) Young people and youth organisations are vital to the future of democracy. European values, and European identity, bringing innovative perspectives, especially when empowered through education and dialogue to understand, embrace, and promote these shared principles.</u></p>

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	<p>AT (Comments): We support deepening the focus in the CERV+ strand on young people as current and future guardians of democracy and Union values.</p> <p>We suggest an own recital on youth engagement, see text proposal (21a).</p> <p>SI (Drafting suggestions): Add:” The Programme shall ensure accessible funding for local CSOs through intermediary organisations and re-granting mechanism.</p> <p>Implementation shall be guided by biennial work programmes prepared in consultation with Programme Committees and the Civil Dialogue Group.”</p> <p>SI (Comments):</p>

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	<p>Re-granting was identified by DG JUST (2025 CERV Evaluation) as the most efficient access route for small organisations. Embedding it in the recital ensures continuation of this instrument in AgoraEU, thereby promoting participation and territorial balance.</p> <p>This bridges recital-level and article-level provisions, ensuring consistency between narrative and binding clauses. It underscores Slovenia’s request for predictable planning cycles and participatory management.</p>
<p>(22) In order to bring the Union closer to its citizens and to foster democratic participation, a variety of actions and coordinated efforts are necessary. European citizenship and European identity should be developed and advanced by encouraging citizens’ understanding of the policy-making process, and by promoting civic engagement in the actions of the Union. Remembrance activities and critical reflection on Europe’s historical memory are necessary to make citizens aware of the common history, and to lay the foundation for a common future and shared values. Furthermore, supporting civil society organisations at local, regional, national and transnational level in the areas covered by the Programme will contribute to increasing citizens’ engagement in society and ultimately to their active involvement in the democratic life of the Union. At the same time, supporting activities that promote mutual understanding, intercultural dialogue, cultural and linguistic diversity, social inclusion and respect for others fosters a sense of belonging to the Union and of a common citizenship under a European identity, based on a shared understanding of our common European values, culture, history and heritage.</p>	<p>RO (Drafting suggestions): We appreciate the recital’s aim of bringing the Union closer to citizens through democratic participation and shared historical memory. We support integrating, in a balanced way, the historical experiences of post-communist Member States into the narrative of European memory, to strengthen cohesion between old and new Member States and to ensure a comprehensive understanding of Europe’s totalitarian past. We also propose adding, “in particular young persons,” as follows: “Remembrance activities and critical reflection on Europe’s historical memory are necessary to make citizens, in particular young persons, aware of the common history...”.</p> <p>LV (Drafting suggestions): (22) In order to bring the Union closer to its citizens and to foster democratic participation, a variety of actions and coordinated efforts are necessary. European citizenship and European identity should be developed and advanced by encouraging citizens’ understanding of the policy-making process, and by promoting civic engagement in the actions of the Union. Remembrance activities and critical reflection on Europe’s historical memory are necessary to make citizens aware of the common history, and to lay the foundation for a</p>

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	<p>common future and shared values. Furthermore, supporting civil society organisations at local, regional, national and transnational level in the areas covered by the Programme will contribute to increasing citizens’ engagement in society and ultimately to their active involvement and participation in the democratic life of the Union. At the same time, supporting activities that promote mutual understanding, intercultural dialogue, cultural and linguistic diversity, social inclusion and respect for others, <u>in particular the inclusion of vulnerable and marginalised groups, such as Roma community, will help to</u> fosters a sense of belonging to the Union and of a common citizenship under a European identity, based on a shared understanding of our common European values, culture, history and heritage.</p> <p>IE (Drafting suggestions):</p> <p>In order to bring the Union closer to its citizens and to foster democratic participation, a variety of actions and coordinated efforts are necessary. European citizenship and European identity should be developed and advanced by encouraging citizens’ understanding of the policy-making process, and by promoting civic engagement in the actions of the Union. Remembrance activities and critical reflection on Europe’s historical memory are necessary to make citizens aware of the common history, and to lay the foundation for a common future and shared values. Furthermore, supporting and empowering civil society organisations at local, regional, national and transnational level in the areas covered by the Programme will contribute to increasing citizens’ engagement in society and ultimately to their active involvement in the democratic life of the Union. At the same time, supporting activities that promote mutual understanding, intercultural dialogue, cultural and linguistic diversity, social inclusion and respect for others fosters a sense of belonging to the Union and of a common citizenship under a European identity, based on a shared understanding of our common European values, culture, history and heritage.</p> <p>IE</p>

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	<p>(Comments):</p> <p>Drafting suggestion</p> <p>EL</p> <p>(Drafting suggestions):</p> <p>(22) In order to bring the Union closer to its citizens and to foster democratic participation, a variety of actions and coordinated efforts are necessary. European citizenship and European identity should be developed and advanced by encouraging citizens’ understanding of the policy-making process, and by promoting civic engagement in the actions of the Union. Furthermore, bringing citizens together through town-twinning projects and networks of towns and supporting civil society organisations at local, regional, national and transnational level in the areas covered by the Programme will contribute to increasing citizens’ engagement in society and ultimately to their active involvement in the democratic life of the Union. At the same time, supporting activities that promote mutual understanding, intercultural dialogue, cultural and linguistic diversity, social inclusion and respect for others fosters a sense of belonging to the Union and of a common citizenship under a European identity, based on a shared understanding of our common European values, culture, history and heritage. The promotion of a greater sense of belonging to the Union and of Union values is particularly important among citizens of its outermost regions because of their remoteness and distance from continental Europe.Remembrance activities and critical reflection on Europe’s historical memory are necessary to make citizens aware of the common history, and to lay the foundation for a common future and shared values. Furthermore, supporting civil society organisations at local, regional, national and transnational level in the areas covered by the Programme will contribute to increasing citizens’ engagement in society and ultimately to their active involvement in the democratic life of the Union. At the same time, supporting activities that promote mutual understanding, intercultural dialogue, cultural and linguistic diversity, social</p>

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	<p>inclusion and respect for others fosters a sense of belonging to the Union and of a common citizenship under a European identity, based on a shared understanding of our common European values, culture, history and heritage.</p> <p>DE (Comments): See comment on recital 20 above.</p> <p>AT (Drafting suggestions): (22) In order to bring the Union closer to its citizens and to foster democratic participation, <u>including among young people</u>, a variety of actions and coordinated efforts are necessary. European citizenship and European identity should be developed and advanced by encouraging citizens' understanding of the policy-making process, and by promoting civic engagement in the actions of the Union. Remembrance activities and critical reflection on Europe's historical memory are necessary to make citizens aware of the common history, and to lay the foundation for a common future and shared values. Furthermore, supporting civil society organisations at local, regional, national and transnational level in the areas covered by the Programme will contribute to increasing citizens' engagement in society and ultimately to their active involvement in the democratic life of the Union. At the same time, supporting activities that promote mutual understanding, intercultural dialogue, cultural and linguistic diversity, social inclusion and respect for others fosters a sense of belonging to the Union and of a common citizenship under a European identity, based on a shared understanding of our common European values, culture, history and heritage.</p> <p>AT (Comments): Add reference to young people.</p>

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	We very much welcome support measures for remembrance projects and activities.
<p>(23) Civil society organisations, and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, holding institutions accountable, and driving positive change. The Programme should help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively. To this end, Union funding should complement efforts at national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018¹³, as well as Council conclusions of 10 March 2023¹⁴ and 7 March 2025¹⁵. Civil society also plays an important role in ensuring an effective implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council¹⁶ by fostering a speak-up culture and a favourable environment for whistleblowers.</p> <p>13 2018/2619(RSP) (OJ C 390, 18.11.2019, p. 117–119, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2019_390_R_0017)</p> <p>14 ST-7388/23, Council Conclusions on the application of the EU Charter of Fundamental Rights; The role of the civic space in protecting and promoting fundamental rights in the EU</p> <p>15 ST-6878/25, Council Conclusions on the application of the EU Charter of Fundamental Rights: funding to promote, protect and enforce fundamental rights</p> <p>16 Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L 305, 26.11.2019, p. 17, ELI: http://data.europa.eu/eli/dir/2019/1937/oj).</p>	<p>RO (Comments):</p> <p>This recital emphasises the essential role of civil society organisations and the need to ensure adequate resources and an independent and effective operating environment. We propose establishing structured dialogue mechanisms, including, where appropriate, a consultative committee with representatives from all Member States. This would help identify needs, risks and best practices, increase transparency and legitimacy, and strengthen trust between European institutions and civil society.</p> <p>LV (Drafting suggestions):</p> <p>(23) Civil society organisations, and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, holding institutions accountable, and driving positive change. <u>At the same civil society and other civic space actors are also facing increasing restrictions and financial pressures.</u> The Programme should <u>therefore</u> help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively. To this end, Union funding should complement efforts at national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018¹³, as well as Council conclusions of 10 March 2023¹⁴ and 7 March 2025¹⁵. Civil society also plays an important role in ensuring an effective implementation of Directive (EU)</p>

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	<p>2019/1937 of the European Parliament and of the Council¹⁶ by fostering a speak-up culture and a favourable environment for whistleblowers.</p> <p>LV (Comments):</p> <p>Given the trend of decreasing funding for civil society advocacy and civic dialogue both at the EU and national levels*, Latvia calls for a clearer acknowledgement of this issue in the recitals to further emphasize the need to strengthen and support the core activities of civil society organisations.</p> <p>* Source: European Civic Forum (2025). Civic Space Report 2025.</p> <p>IE (Drafting suggestions):</p> <p>Civil organisations, and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, holding institutions accountable, and driving positive change. The Programme should help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively and to support a thriving civic space. To this end, Union funding should complement efforts at national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018 , as well as Council conclusions of 10 March 2023 and 7 March 2025 . Civil society also plays an important role in ensuring an effective implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council by fostering a speak-up culture and a favourable environment for whistleblowers</p> <p>IE (Comments):</p>

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	<p>Drafting suggestion</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(23) Civil society organisations, and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, holding institutions accountable, and driving positive change. The Programme should help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively. To this end, available Union funding should complement efforts at national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018^H, as well as Council conclusions of 10 March 2023^I and 7 March 2025^J. Civil society also plays an important role in ensuring an effective implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council^K by fostering a speak-up culture and a favourable environment for whistleblowers.</p> <p>DE</p> <p>(Comments):</p> <p>See comment on recital 10 above.</p> <p>AT</p>

^H 2018/2619(RSP) (OJ C 390, 18.11.2019, p. 117–119, https://eur-lex.europa.eu/legal_content/EN/TXT/?uri=oj:JOC_2019_390_R_0017)

^I ST-7388/23, Council Conclusions on the application of the EU Charter of Fundamental Rights; The role of the civic space in protecting and promoting fundamental rights in the EU

^J ST-6878/25, Council Conclusions on the application of the EU Charter of Fundamental Rights: funding to promote, protect and enforce fundamental rights

^K Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L 305, 26.11.2019, p. 17, ELI: <http://data.europa.eu/eli/dir/2019/1937/oj>).

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	<p>(Drafting suggestions):</p> <p>(23) Civil society organisations, youth organisations and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, holding institutions accountable, and driving positive change. The Programme should help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively. To this end, Union funding should complement efforts at national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018¹³, as well as Council conclusions of 10 March 2023¹⁴ and 7 March 2025¹⁵. Civil society also plays an important role in ensuring an effective implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council¹⁶ by fostering a speak-up culture and a favourable environment for whistleblowers.</p> <p>(23a) An open, transparent and regular dialogue with the beneficiaries of the Programme and other relevant stakeholders should be established by setting up a Civil Dialogue Group. The Civil Dialogue Group should be an open and informal forum for discussion and should contribute to the exchange of experiences and good practices and to the discussion of policy developments within the areas and objectives covered by the Programme and related areas. The Civil Dialogue Group should not have any responsibility regarding the management of the Programme.</p> <p>AT</p> <p>(Comments):</p> <p>We support deepening the focus in the CERV+ strand on specifically youth organisations as a recognised part of civil society.</p>

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	<p>We suggest to reinsert the recital on the Civil Dialogue Group as in the current CERV Regulation.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(23) Civil society organisations, and other civic space actors, such as independent human rights bodies, equality bodies and Ombudspersons Institutions, play a vital role in contributing to the implementation of policy, encouraging people’s participation, <u>holding institutions accountable</u>, and driving positive change, including inter alia through advocacy, strategic litigation, campaigning, communication and other watchdog activities. The Programme should help ensure sufficient resources and an enabling environment for them to operate independently, freely, safely, and effectively. In order to ensure the independence and sustainability of civil society organisations, the Programme shall provide for the award of operating grants. To this end, Union funding should complement efforts at</p>

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	<p>national level by supporting, protecting, empowering and building their capacity, as emphasised in the European Parliament resolution of 19 April 2018 21, as well as Council conclusions of 10 March 2023 22 and 7 March 2025 23. Civil society also plays an important role in ensuring an effective implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council 24 by fostering a speak-up culture and a favourable environment for whistleblowers.</p> <p>NEW: 23(bis) Particular attention should be paid to the accessibility of the Programme for civil society organisations at local, regional, national and transnational level, including local grassroots civil society organisations. This shall include the provision of financial support to third parties.</p> <p>NL (Comments):</p> <p>NL requests two additions to this paragraph to ensure CSO’s can operate independently, freely, safely, and effectively at all times.</p> <p>Advocacy, watchdog functions, strategic litigation, campaigning and communication are indispensable activities for civil society organisations to expose rights violations, hold institutions accountable, and give voice to marginalised communities. Explicitly listing these activities in the Regulation, as is the case in the current CERV Regulation in Recital 22 and Annex 1, 6.b), would ensure that organisations can continue this essential work, especially in times of shrinking civic space and democratic backsliding.</p> <p>NL requests the introduction of 23b with the following rationale. Financial support to third parties, or ‘regranting’, is a crucial mechanism to ensure that EU funds reach national and local organisations, through intermediaries. This scheme should be continued across all thematic substrands of the CERV+</p>

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	<p>Strand. This wording is similar to the current CERV Regulation (see end of Recital 22).</p> <p>In relation to the 'holding institutions accountable', clarification is needed on the impact of the <i>Guidance regarding funding for activities related to the development, implementation, monitoring, and enforcement of Union legislation and policy</i>. This should not unduly restrict projects of civil society also aimed at approaching EU-officials and institutions as part of their (advocacy) work.</p> <p>SI (Drafting suggestions):</p> <p>Insert before the final sentence: “Funding shall include multi-annual Framework Partnership Agreements (FPAs) for organisations with a proven record in promoting Union values.”</p> <p>SI (Comments):</p> <p>FPAs are used successfully in <i>Creative Europe</i> and <i>Erasmus+</i>. Mentioning them guarantees continuity, long-term stability of key networks, and predictability of operations, directly supporting Article 175 TFEU’s cohesion objectives</p>
<p>(24) The Court of Justice of the European Union has confirmed that the Union is a legal structure that is based on the fundamental premise that each Member State shares with all the other Member States, and recognises that they share with it, the common values contained in Article 2 TEU, on which the Union is founded¹⁷. That premise is based on the specific and essential characteristics of Union law, including the autonomy it enjoys in relation to the laws of the Member States and to international law. That premise implies and justifies the existence of mutual trust between the Member States that those values will be recognised and, therefore, that the Union law that</p>	<p>HU (Comments):</p> <p>We would like to draw attention to a general transparency issue that should be reflected in the text. The European Court of Auditors and the Commission itself have recently acknowledged concerns about transparency and accountability in the area of NGO funding under direct management programmes. In this context, there is a risk that certain politically active NGOs may gain access to EU funds. These findings suggest that this is a broader,</p>

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<p>implements them will be respected. It follows that compliance by a Member State with the values contained in Article 2 TEU is a condition for the enjoyment of all the rights deriving from the application of the Treaties to that Member State. The Court of Justice of the European Union has therefore confirmed that in the areas for which the Union is competent, it can take action to ensure respect for the values set out in Article 2 TEU.</p> <hr/> <p>17 This stems directly from Opinion 2/13, EU:C:2014:2454, paragraph 168.</p>	<p>systemic issue that deserves careful consideration in all relevant EU-funded programmes and especially in CERV, which is the predecessor of Agora EU.</p> <p>Improved transparency, transferability between pillars and the resulting excessive flexibility shall therefore be addressed.</p> <p>This is essential to safeguard public trust in democratic institutions and the integrity of the EU’s financial instruments.</p> <p>NL (Comments):</p> <p>Question: why the choice for the current second sentence? Usually the first sentence (“fundamental premise”) is followed by the third sentence (“that premise implies and justifies the existence of mutual question”) ?</p>
<p>(25) At a time when European societies face challenges that affect democracies, such as raise of extremisms and intolerance, disinformation and foreign information manipulation and interference by hostile actors, it is crucial that Union values such as respect for fundamental rights, equality and democracy, continue to be actively cultivated, protected, promoted, enforced, and shared among citizens and peoples, so that those values remain at the heart of the Union project. A deterioration in their protection in any Member State can have detrimental effects on the Union as a whole. It is therefore crucial that this Programme contributes to protecting Union values, including respect for fundamental rights, equality and democracy.</p>	<p>IT (Drafting suggestions):</p> <p>(25) At a time when European societies face challenges that affect democracies, such as raise of extremisms and intolerance, disinformation and foreign information manipulation and interference by hostile actors, it is crucial that Union values such as respect for fundamental rights, equality and democracy, continue to be actively cultivated, protected, promoted, enforced, and shared among citizens and peoples, so that those values remain at the heart of the Union project. A deterioration in their protection in any Member State can have detrimental effects on the Union as a whole. It is therefore crucial that this Programme contributes to protecting Union values, including respect for fundamental rights, equality, and democracy and rule of law.</p> <p>IT (Comments):</p> <p>IT supports the drafting suggestion from IE</p>

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	<p>IE (Drafting suggestions): At a time when European societies face challenges that affect democracies, such as raise of extremisms and intolerance, disinformation and foreign information manipulation and interference by hostile actors, it is crucial that Union values such as respect for fundamental rights, equality and democracy, continue to be actively cultivated, protected, promoted, enforced, and shared among citizens and peoples, so that those values remain at the heart of the Union project. A deterioration in their protection in any Member State can have detrimental effects on the Union as a whole. It is therefore crucial that this Programme contributes to protecting Union values, including respect for fundamental rights, equality democracy, and rule of law</p> <p>IE (Comments): Ireland strongly welcomes recital 25 and the values-based approach for which it calls</p> <p>FI (Drafting suggestions): (25) At a time when European societies face challenges that affect democracies, such as raise of extremisms and intolerance, disinformation and foreign information manipulation and interference by hostile actors, it is crucial that Union values such as respect for fundamental rights, equality, including gender equality, and democracy, continue to be actively cultivated, protected, promoted, enforced, and shared among citizens and peoples, so that those values remain at the heart of the Union project. A deterioration in their protection in any Member State can have detrimental effects on the Union as a whole. It is therefore crucial that this Programme contributes to protecting Union values, including respect for fundamental rights, equality and democracy.</p>

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	<p>FI (Comments): We suggest adding "including gender equality", because of the rise of the anti-gender movements in many countries and the important aim of the EU to push for progress in gender equality in this context.</p> <p>DE (Drafting suggestions): (25) At a time when European societies face challenges that affect democracies, such as raise of extremism and intolerance, disinformation and foreign information manipulation and interference by hostile actors, it is crucial that Union values such as respect for fundamental rights, equality and democracy, continue to be actively cultivated, protected, promoted, enforced, and shared among citizens and peoples, so that those values remain at the heart of the Union project. A deterioration in their protection in any Member State can have detrimental effects on the Union as a whole. It is therefore crucial that this Programme contributes to protecting Union values, including respect for fundamental rights, equality and democracy.</p> <p>DE (Comments): The singular already encompasses all forms of extremism.</p> <p>AT (Drafting suggestions): (25) At a time when European societies face challenges that affect democracies, such as raise of extremism and intolerance, disinformation and foreign information manipulation and interference by hostile actors, it is crucial that Union values such as respect for fundamental rights, equality and democracy, continue to be actively cultivated, protected, promoted, enforced, and shared among citizens and peoples, so that those values remain at the heart of the Union project. A deterioration in their protection in any Member</p>

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	<p>State can have detrimental effects on the Union as a whole. It is therefore crucial that this Programme contributes to protecting Union values, including respect for fundamental rights, equality <u>including gender equality</u> and democracy.</p> <p>AT (Comments): AT supports FI proposal to explicitly include gender equality</p>
<p>(26) In light of increasing risks linked to natural hazards, climate and environmental disasters, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the Union’s and Member States’ capability to anticipate, prepare for, and respond to crises. The Programme should therefore support citizens’ education and engagement on crisis preparedness thus enhancing societal resilience.</p>	<p>RO (Drafting suggestions): The recital highlights increasing risks (climatic, environmental, health, technological, security-related) and the need for strengthened crisis preparedness and citizen engagement. We propose clearer formulation in the final sentence referring to education and engagement on crisis preparedness to enhance societal resilience.</p> <p>IT (Comments): We suggest to include a reference to the role of Union Civil Protection Mechanism for the protection of cultural heritage for preparedness and coordinated reaction in case of emergency, valorising past efforts and achievements at EU level to integrate cultural heritage integrated into civil protection frameworks, backed by policy advances, technical guidance, and cross-sectoral cooperation.</p> <p>DE (Drafting suggestions):</p>

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	<p>(26) In light of increasing risks linked to natural hazards, climate and environmental disasters, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the cultural and creative sectors’ as well as the Union’s and Member States’ capability to anticipate, prepare for, and respond to crises. The Programme should therefore support citizens’ education and engagement on crisis preparedness thus enhancing societal resilience.</p> <p>DE (Comments): The aforementioned risk factors also affect the CCS. Therefore, the regulation should especially consider the resilience of the CCS.</p> <p>AT (Drafting suggestions): (26) In light of increasing risks linked to natural hazards, climate and environmental disasters, health emergencies, technological accidents, evolving security threats, <u>the mental health crisis, rising levels of loneliness, population ageing, the silent noncommunicable diseases pandemic, the cost of living crisis,</u> and other disruptions, it is essential to enhance the Union’s and Member States’ capability to anticipate, prepare for, and respond to crises. The Programme should therefore support citizens’ education and engagement on crisis preparedness <u>as well as awareness-raising against crisis-related disinformation</u> thus enhancing societal resilience.</p> <p>AT (Comments): We believe public health, psychosocial factors, demographic and socio-economic developments should be given more attention in this context, since culture can be an important levy to alleviate suffering in these relations. Highligh the fight against specific types of disinformation related to societal crises (e.g. climate disinformation, COVID-19 vaccine disinformation etc.)</p>

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<p>(27) Hence, the Programme should also support actions aiming at safeguarding and strengthening democracy in the Union, reinforcing public trust in democracy and democratic institutions, strengthening democratic preparedness and resilience, fostering citizens’ engagement, participation and awareness of common history and values, thereby supporting citizens’ exercise of their rights, including their electoral rights, in full respect of Member States’ competences in the organisation of elections. The Programme should also contribute to fostering critical thinking, civic participation and democracy through education as a lifelong effort, so that all citizens have the skills to recognise foreign information, manipulation and interference and disinformation.</p>	<p>RO (Drafting suggestions): This recital focuses on critical thinking, education and strengthening democratic resilience against disinformation. We consider it necessary to include an explicit reference to media literacy as an educational tool, encompassing analytical skills, source verification, understanding algorithmic mechanisms and responsible use of information channels—essential for enabling citizens, particularly young people, to recognise and counteract manipulation, foreign interference and organised disinformation campaigns.</p> <p>DE (Comments): See comment on Article 7 (1) lit. f. below.</p> <p>AT (Drafting suggestions): (27) Hence, the Programme should also support actions aiming at safeguarding and strengthening democracy in the Union, <u>including community building and care</u>, reinforcing public trust in democracy and democratic institutions, strengthening democratic preparedness and resilience, fostering citizens’ engagement, participation and awareness of common history and values, thereby supporting citizens’ exercise of their rights, including their electoral rights, in full respect of Member States’ competences in the organisation of elections. The Programme should also contribute to fostering critical thinking, civic participation and democracy through education as a lifelong effort, <u>including non-formal and informal learning</u>, so that all citizens have the skills to recognise foreign information, manipulation and interference and disinformation.</p>

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	<p>AT (Comments): Add reference to community building and care. In terms of crisis preparedness, community resilience and response is already part of official guidance in some MS. Community building, care, and response can be an effective way to tackle sudden or chronic public health-related threats (climate change-related heatwaves, pandemics, isolation). It may also contribute to community mental health and wellbeing, by e.g. reducing loneliness, whose health effects may be comparable to that of smoking. Add reference to non-formal and informal learning.</p> <p>SI (Drafting suggestions): Add: “, including support for local democracy initiatives such as town-twinning and networks of towns.”</p> <p>SI (Comments): The draft recital already covers “citizens’ engagement”. Adding the twinning/networks clause preserves CERV’s most accessible instrument (average grant €30 000–€60 000), vital for smaller municipalities and cross-border cohesion.</p>
<p>(28) The Programme should foster synergies and complementarity with Global Europe as it will contribute to the advancement of the Union’s international cultural relations and to the Union’s external action objectives through cultural cooperation.</p>	<p>DE (Comments): What specific effects would the links between the AgoraEU Regulation and other programmes (also still under negotiation) have? We welcome to use cooperation and synergies, e.g. in the field of foreign broadcasting.</p>

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	Future instruments of EU regional policy (such as the current ERDF and ESF+) should also be mentioned as complementary funding instruments in the cultural and creative sectors. This would strengthen the sustainability and broad effect of AgoraEU measures in this area.
<p>(29) The Programme should also support the financing of technical and organisational support for the implementation of Regulation (EU)2019/788 of the European Parliament and of the Council¹⁸, thereby underpinning the exercise by citizens of the right to launch and support European citizens' initiatives. Together with the other rights set out in Article 24 TFEU, that right ensures citizens' direct participation in the democratic life of the Union.</p> <hr/> <p>18 Regulation (EU) 2019/788 of the European Parliament and of the Council of 17 April 2019 on the European citizens' initiative (OJ L 130, 17.5.2019, p. 55, ELI: http://data.europa.eu/eli/reg/2019/788/oj).</p>	<p>RO (Comments): We consider it useful to introduce an additional recital (29a) concerning the Programme Committee.</p>
<p>(30) [To ensure consistency, the budgetary guarantee and financial instruments under the Programme, including when combined with other forms of non-repayable support in blending operations, should be implemented in accordance with the applicable rules of the European Competitiveness Fund (ECF) InvestEU Instrument through agreements concluded for that type of support under the ECF InvestEU Instrument.]</p>	<p>PL (Comments): The provisions here require further clarification - how the mentioned mechanism would function.</p>
<p>(31) [Where Union support under the Programme is to be provided in the form of a budgetary guarantee or a financial instrument, including where combined with non-repayable support in a blending operation, it is necessary that such support is provided exclusively through the ECF InvestEU</p>	

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Instrument in accordance with the applicable rules of the ECF InvestEU Instrument.]	
<p>(32) The Commission should be able to divide budgetary commitments into annual instalments. In that case, the Commission should commit the annual instalments during the implementation of the Programme, taking into account the progress of the actions that receive financial assistance, their estimated needs and the budget available.</p>	<p>IT (Drafting suggestions):</p> <p>(32) The Commission should be able to divide budgetary commitments into annual instalments. In that case, the Commission should commit the annual instalments during the implementation of the Programme, in consultation with the Member States as part of programme governance arrangements, taking into account the progress of the actions that receive financial assistance, their estimated needs and the budget available.</p> <p>IE (Drafting suggestions):</p> <p>The Commission should be able to divide budgetary commitments into annual instalments. In that case, the Commission should commit the annual instalments during the implementation of the Programme, in consultation with the Member States as part of programme governance arrangements, taking into account the progress of the actions that receive financial assistance, their estimated needs and the budget available</p> <p>IE (Comments):</p> <p>The Member States should be consulted on annual allocations as part of governance arrangements, especially in the context of the effectiveness of actions as they progress and analysis of estimated needs.</p> <p>BE (Comments):</p>

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	<p>Continuity and transparency should be ensured in the implementation of the programme. Therefore, this paragraph should provide more information on how the Commission intends to communicate about the implementation.</p> <p>How will the accessibility of the programme for small organisations and small-scale projects be ensured? Why is this not mentioned?</p> <p>NL (Comments): Based on experiences with the current Creative Europe and CERV programs, NL would like to ask for particular attention to careful monitoring and transparent data disclosure in the further elaboration of the proposal.</p>
<p>(33) Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council¹⁹ applies to the Programme. It lays down the rules on the establishment and the implementation of the general budget of the Union, including the rules on grants, prizes, non-financial donations, procurement, indirect implementation, financial assistance, financial instruments and budgetary guarantees.</p> <hr/> <p>¹⁹ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (OJ L, 2024/2509, 26.9.2024, ELI: http://data.europa.eu/eli/reg/2024/2509/oj).</p>	<p>NL (Drafting suggestions): Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council¹⁹ applies to the Programme. It lays down the rules on the establishment and the implementation of the general budget of the Union, including the rules on grants, prizes, non-financial donations, procurement, indirect implementation, financial assistance, financial instruments and budgetary guarantees. The Programme shall not preclude the possibility of two-stage calls for applicant proposals in the CERV+ work programme.</p> <p>NL (Comments): NL requests assurances that so-called two-stage calls remains a possibility within the work programmes and calls for proposals. This is a desirable system. Stakeholders in the CERV+ programme favour greater use of two-stage calls, whereby applicants may first submit a short concept note prior to</p>

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	<p>being invited to submit a full application In this approach, a call has two deadlines: first, applicants submit a short concept note, and only those positively assessed are invited to submit a full application. They note that single-stage calls can be burdensome, as preparing a complete proposal requires significant effort. Two-stage calls reduce unnecessary workload, allowing applicants to submit an initial proposal without incurring the full costs of a detailed application that may have little chance of success.</p>
<p>(34) In accordance with Regulation (EU, Euratom) 2024/2509, Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council²⁰, Council Regulation (EC, Euratom) No 2988/95²¹, Council Regulation (Euratom, EC) No 2185/96²² and Council Regulation (EU) 2017/1939²³, the financial interests of the Union are to be protected through proportionate measures, including the prevention, detection, correction and investigation of irregularities and fraud, the recovery of funds lost, wrongly paid or incorrectly used and, where appropriate, the imposition of administrative sanctions. In particular, in accordance with Regulations (EU, Euratom) No 883/2013 and (Euratom, EC) No 2185/96, the European Anti-Fraud Office (‘OLAF’) may carry out investigations, including on-the-spot checks and inspections, with a view to establishing whether there has been fraud, corruption or any other illegal activity affecting the financial interests of the Union. In accordance with Regulation (EU) 2017/1939, the European Public Prosecutor's Office (EPPO) may investigate and prosecute fraud and other illegal activities affecting the financial interests of the Union as provided for in Directive (EU) 2017/1371 of the European Parliament and of the Council²⁴. In accordance with Regulation (EU, Euratom) 2024/2509, any person or entity receiving Union funds is to fully cooperate in the protection of the Union’s financial interests, to grant the necessary rights and access to the Commission, OLAF, EPPO and the European Court of Auditors and to ensure that any third parties involved in the implementation of Union funds grant equivalent rights.</p>	<p>DE (Drafting suggestions):</p> <p>(34) In accordance with Regulation (EU, Euratom) 2024/2509, Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council , Council Regulation (EC, Euratom) No 2988/95 , Council Regulation (Euratom, EC) No 2185/96 and Council Regulation (EU) 2017/1939 , the financial interests of the Union are to be protected through proportionate measures, including the prevention, detection, correction and investigation of irregularities and fraud, the recovery of funds lost, wrongly paid or incorrectly used and, where appropriate, the imposition of administrative sanctions. In particular, in accordance with Regulations (EU, Euratom) No 883/2013 and (Euratom, EC) No 2185/96, the European Anti-Fraud Office (‘OLAF’) may carry out investigations, including on-the-spot checks and inspections, with a view to establishing whether there has been fraud, corruption or any other illegal activity affecting the financial interests of the Union. In accordance with Regulation (EU) 2017/1939, the European Public Prosecutor's Office (EPPO) may investigate and prosecute fraud and other illegal activities affecting the financial interests of the Union as provided for in Directive (EU) 2017/1371 of the European Parliament and of the Council . In accordance with Regulation (EU, Euratom) 2024/2509, any person or entity receiving Union funds is to fully cooperate in the protection of the Union’s financial interests, to grant the necessary rights and access to the Commission, OLAF, EPPO and the European Court of Auditors and to</p>

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<p>20 Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999 (OJ L248, 18.9.2013, p. 1, ELI: http://data.europa.eu/eli/reg/2013/883/oj).</p> <p>21 Council Regulation (EC, Euratom) No 2988/95 of 18 December 1995 on the protection of the European Communities financial interests (OJ L 312, 23.12.95, p. 1, ELI: http://data.europa.eu/eli/reg/1995/2988/oj).</p> <p>22 Council Regulation (Euratom, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities' financial interests against fraud and other irregularities (OJ L 292, 15.11.1996, p. 2, ELI: http://data.europa.eu/eli/reg/1996/2185/oj).</p> <p>23 Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO') (OJ L 283, 31.10.2017, p. 1, ELI: http://data.europa.eu/eli/reg/2017/1939/oj).</p> <p>24 Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law (OJ L 198, 28.7.2017, p. 29, ELI: http://data.europa.eu/eli/dir/2017/1371/oj).</p>	<p>ensure that any third parties involved in the implementation of Union funds grant equivalent rights. Any measures, especially investigations and coercive measures, shall respect the freedom and independence of media and journalists and carefully weigh the principle of proportionality enshrined in Article 5(4) TFEU.</p> <p>DE (Comments):</p> <p>In particular, inspections and on-site audits by OLAF (Office Européen de Lutte Anti-Fraude) could compromise media independence. Therefore, searches of newsrooms should not be permitted without a valid reason.</p>
<p>(35) [The Programme is to be implemented in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance] which establishes the rules for the expenditure tracking and the performance framework for the budget, including rules for ensuring a uniform application</p>	<p>IT (Comments):</p> <p>Notwithstanding the fact that this is bracketed text, IT supports in full the requests for clarifications submitted by IE concerning the governance and</p>

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<p>of the principles of ‘do no significant harm’ and gender equality referred to in Article 33(2), points (d) and (f), of Regulation (EU, Euratom) 2024/2509 respectively, rules for monitoring and reporting on the performance of Union programmes and activities, rules for establishing a Union funding portal, rules for the evaluation of the programmes, as well as other horizontal provisions applicable to all Union programmes such as those on information, communication and visibility, while taking into account the scope and nature of the activities and priorities.¹</p>	<p>implementation structures for the programme, what is envisaged for ongoing monitoring and periodic evaluation of and reporting on the programme and proposed key actions under each strand of the Programme.</p> <p>IE (Comments): We note comments made by MS at CAC on 09 December 2025 regarding monitoring, evaluation and reporting and are supportive of a reference to these elements in the proposal.</p> <p>DE (Comments): The existing regulation for Creative Europe contains separate articles on monitoring and evaluating of the programme. What specific measures does the Commission propose for these two activities? How do they differ from the previous approach? What (additional) requirements would this entail for the Member States?</p> <p>BE (Comments): The link between AgoraEU and the Regulation on the performance framework should be clarified to ensure transparency and predictability in the implementation, evaluation, and communication of the programme.</p>
	<p>FR (Drafting suggestions): (35a) In order to ensure an effective and transparent implementation of the programme, the Commission shall draw up and adopt the work programmes in direct consultation in close coordination with the Member States, within the framework of a programme committee in accordance as foreseen in with Regulation (EU) No 18219842/2011, under the examination procedure it provides. This comitology procedure enables the Member States to monitor</p>

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	<p><u>deliver an opinion on the priorities, on</u> budgetary allocation between the thematic strands <u>and substrands</u> and to assess the results achieved, thereby ensuring sound governance of the programme.]</p> <p>FR (Comments): On the basis of Recitals 35 and 36, the French delegation wishes for an <i>ad hoc</i> recital to refer to comitology. In order to ensure the effective and transparent implementation of the Programme, the Commission should prepare the work programmes of AgoraEU in close consultation with the Member States, within the framework of a programme committee pursuant to comitology, so as to enable Member States to monitor the allocation of the budget between thematic strands and to assess the results achieved. Indeed, the sound governance of the Programme requires transparency and the effective participation of Member States.</p>
<p>(36) The Programme should also support the role of Programme Desks, which Member States have the possibility to establish, and which should provide guidance and assistance to applicants on funding opportunities and cross-border collaborations, contributing to the Programme’s outreach visibility and dissemination in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance]. Programme Desks should carry out their functions independently and without interference from public authorities in their decision making, and ought not to have any responsibility regarding the management of the programme²⁵.</p> <hr/> <p>25 In order to promote the Programme at national level, provide relevant information on the various types of financial support available under Union policy, and assist operators to apply for support under the Programme, the Programme shall support the establishment of Desks in participating countries. The Desks shall implement their activities aiming to enhance outreach, visibility and dissemination of the Programme results in accordance with Regulation (EU, Euratom) 202X/XXXX</p>	<p>PL (Comments): The future role and functions of national contact points (NCPs) are not clearly defined in the document. Given that NCPs have so far played an essential role in informing applicants, providing guidance on proposal preparation and contributing to the dissemination of programmes at national level, it is necessary that the European Commission clearly outlines their place and functions within the new Programme. This would ensure a smooth transition, continuity, and effective implementation of the Programme in the Member States. At the same time, we would recommend maintaining separate contact points for programme areas regarding culture+media and CERV, which, based on their competence and expertise, could best assist potential program applicants. Furthermore, it is important that the financial resources allocated to Programme are not reduced. Unless we know how management, division of work and responsibilities are defined, we will not</p>

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<p>which establishes the rules for the expenditure tracking and the performance framework for the budget, including the rules applicable to all Union programmes regarding information, communication and visibility obligations, including in particular obligations for beneficiaries and implementing partners</p>	<p>be able to help the Desks to operate more efficiently and provide better support to applicants.</p> <p>IT (Drafting suggestions):</p> <p>(36) The Programme should also support the role of Programme Desks, with appropriate resourcing for Programme Desks or equivalents in each of the thematic areas of the programme, which Member States have the possibility to establish, and which should provide guidance and assistance to applicants on funding opportunities and cross-border collaborations, contributing to the Programme’s outreach visibility and dissemination in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance]. Programme Desks should carry out their functions independently and without interference from public authorities in their decision making, and ought not to have any responsibility regarding the management of the programme</p> <p>IT (Comments):</p> <p>We support comments and drafting suggestions from IE concerning the Creative Europe Desks, in particular on the need to give consideration to the appropriate structure and expertise to support the implementation of new strands, such as the News Media objective, and to ensure that the support systems, for example, the programme desks, have the appropriate expertise.</p> <p>IE (Drafting suggestions):</p> <p>(36) The Programme should also support the role of Programme Desks, with appropriate resourcing for Programme Desks or equivalents in each of the thematic areas of the programme, which Member States have the possibility to establish, and which should provide guidance and assistance to applicants on funding opportunities and cross-border</p>

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	<p>collaborations, contributing to the Programme’s outreach visibility and dissemination in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance]. Programme Desks should carry out their functions independently and without interference from public authorities in their decision making, and ought not to have any responsibility regarding the management of the programme</p> <p>IE (Comments):</p> <p>The Creative Europe Desks have been critical to the successful implementation of the programme to date. If the new programme expands in size as per the proposal, the Desks will also have to expand in size and expertise to meet the new demands. We note that given the additional sectors and scale of the programme, increased expertise, resources and funding would be required by the desks to fulfil their role in supporting applicants for all funding strands, if this is the envisaged future direction.</p> <p>In that regard, consideration needs to be given to the appropriate structure and expertise to support the implementation of new strands, such as the News Media objective, and to ensure that the support systems, for example, the programme desks, have the appropriate expertise.</p> <p>This also raises the question of how the desks are to be match funded from national partners if the desks are to be fully independent. Funding structures could also become increasingly complex with the introduction of new priorities. Therefore, clarification on a proposed Desk Network structure would be welcome in the proposal.</p> <p>Programme Desks should also be included in the substantive Articles of the proposal, where appropriate, and not just in the Recitals</p> <p>HR</p>

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	<p>(Drafting suggestions):</p> <p>The Programme should also support the role of National program contact Desks, which Member States have the possibility are encouraged to establish, and which should provide guidance and assistance to applicants on funding opportunities and cross-border collaborations, contributing to the Programme’s outreach visibility and dissemination in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance].</p> <p>FR (Comments):</p> <p>Recital 36 could more explicitly refer to the financing of desks under the Programme.</p> <p>DE (Comments):</p> <p>The success of the programme remains dependent on maintaining CULTURE, MEDIA and CERV Desks with adequate staffing. Their expertise and proximity to stakeholders are crucial for implementation in the member states.</p> <p>BE (Comments):</p> <p>As the new programme proposal merges Creative Europe and the CERV programme, and as the content and the specificities of each strand/sector differs, we wonder what will be the scope and the responsibilities of the programme desks in the new programme. Will there be desks for each sector/strand? Can COM clarify?</p> <p>What is meant by ‘... Programme Desks should carry out their functions independently and without interference from public authorities ...’? Does</p>

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	<p>this mean that Programme Desks can no longer be embedded within ministries? The terms ‘public authorities’ and ‘interference’ should be further clarified.</p> <p>AT (Drafting suggestions):</p> <p>(36) The Programme should also support the role of Programme Desks, which Member States have the possibility to shall establish <u>and co-finance in accordance with competences at national level, and which</u> The Programme Desks should provide guidance and assistance to applicants on funding opportunities and cross-border collaborations, contributing to the Programme’s outreach visibility and dissemination in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance]. Programme Desks should carry out their functions independently and without interference from public authorities in their decision making, and ought not to have any responsibility regarding the management of the programme.</p> <p>AT (Comments):</p> <p>The wording on the establishment of Programme Desks is too vague. Also it does not refer to the programme name!? MS need the flexibility to decide whether there shall be one single desk or several desks based on national competences and current structures (Creative Europe Desk and CERV desk). It should be highlighted that MS co-finance the Desks as well!</p> <p>NL (Drafting suggestions):</p> <p>The Programme should also support the role of Programme Desks, which Member States have the possibility to establish, and which should provide guidance and assistance to applicants on funding opportunities and cross-border collaborations, contributing to the Programme’s outreach visibility</p>

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	<p>and dissemination in accordance with Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance]. Programme Desks and the national contact points should carry out their functions independently and without interference from public authorities in their decision making, and ought not to have any responsibility regarding the management of the programme²⁵.</p> <p>NL (Comments): CER V+ programmes are currently promoted by national contact points in various Member States in the capacity of an executive body as part of a ministry, yet they do their work independently. Suggestion is to align with the previous formulation in the CERV Regulation: “Programme contact points shall carry out their functions independently.”</p> <p>SK (Comments): From the perspective of the Desks, the practical implementation of the new "AgoraEU" programme raises some questions. As it merges three separate programmes, it is not yet clear how management, division of work and responsibilities will be defined. Clarifying these aspects in advance would help the Desks to operate efficiently and provide better support to applicants.</p> <p>Experience clearly shows that the existence of the Creative Europe Desks is of key importance for the successful implementation and visibility of the programme. The desks significantly contribute to its visibility, play an irreplaceable role in communication with applicants, provide them with practical support and guidance, and at the same time help maintain contacts and connect domestic entities with foreign partners. Thanks to their activities, the European dimension of cooperation in the field of culture and the creative sector is also strengthened, which has a direct positive impact on the quality of projects and the international ties of individual organisations. In the case of the CERV+ programme, a dedicated CERV+ National Contact Point (NCP) should be established to provide expert guidance to applicants in the fields covered by the programme — including citizens’ engagement and participation,</p>

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	<p>democracy, rule of law, and the fight against discrimination and gender based violence among others. This would ensure tailored and in-depth support to beneficiaries, avoid confusion among applicants, and prevent the risk of an integrated, multi-programme desk/NCP diluting the thematic expertise required for such a sensitive and complex programme.</p> <p>The scope of their activities and funding should be well defined in order to ensure same support and activities to be provided by them in all AgoraEU countries.</p> <p>From the perspective of the Desks, the practical implementation of the new "AgoraEU" programme raises some questions. As it merges three separate programmes, it is not yet clear how management, division of work and responsibilities will be defined. Clarifying these aspects in advance would help the Desks to operate more efficiently and provide better support to applicants.</p> <p>SI (Drafting suggestions): Add at the end: "Each strand shall have a dedicated Programme Desk or Contact Point to ensure tailored outreach and visibility."</p> <p>SI (Comments): Supported by evidence from EACEA (2023 CERV report) showing a positive correlation between NCP capacity and success rates. Dedicated desks sustain programme absorption and equal access for smaller Member States.</p>
<p>(37) Pursuant to Article 85(1) of Council Decision (EU) 2021/1764²⁶, persons and entities established in overseas countries and territories are eligible for funding subject to the ruled objectives of the Programme and possible arrangements applicable to the Member State to which the relevant overseas country or territory is linked.</p>	<p>DE (Drafting suggestions):</p>

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<p>26 Council Decision (EU) 2021/1764 of 5 October 2021 on the association of the Overseas Countries and Territories with the European Union including relations between the European Union on the one hand, and Greenland and the Kingdom of Denmark on the other (Decision on the Overseas Association, including Greenland) (OJ L 355, 7.10.2021, p. 6, ELI: http://data.europa.eu/eli/dec/2021/1764/oj).</p>	<p>(37) Pursuant to Article 85(1) of Council Decision (EU) 2021/1764^L, persons and entities established in overseas countries and territories are eligible for funding subject to the ruled rules and objectives of the Programme and possible arrangements applicable to the Member State to which the relevant overseas country or territory is linked.</p> <p>SK (Comments): “rules and objectives” instead of “ruled objectives”</p>
<p>(38) Participation of third countries in the ‘Audiovisual’ specific objective requires a certain level of reciprocity and regulatory alignment. For this reason, the situation of their audiovisual markets, the proximity of their legal frameworks with the Union audiovisual media acquis, in particular Directive 2010/13/EU, and the access to their support schemes should be taken into consideration when concluding Association Agreements. This is of particular importance concerning other European countries, whose audiovisual works benefit from the provisions of Directive 2010/13/EU that promote European works, notably the quotas system. In the specific case of acceding countries, candidate countries and potential candidates, the requirement to align their national legislations with Directive 2010/13/EU was already included in Regulation (EU) 2021/818 establishing the Creative Europe Programme. This condition has been an efficient incentive to accelerate their work on the overall alignment with the EU acquis in view of accession.</p>	<p>RO (Drafting suggestions): We support the participation of third countries in the “Audiovisual” strand, provided that reciprocity and alignment with the Union’s audiovisual acquis are ensured. We consider it necessary to include an explicit reference to the essential role of the Audiovisual Media Services Directive in promoting European works through mechanisms such as quotas. Third countries should be clearly invited to adopt regulations supporting the quota system and align national legislation with EU standards to prevent market distortions or relocation of media services to jurisdictions with lower requirements.</p> <p>IT (Drafting suggestions):</p>

^L Council Decision (EU) 2021/1764 of 5 October 2021 on the association of the Overseas Countries and Territories with the European Union including relations between the European Union on the one hand, and Greenland and the Kingdom of Denmark on the other (Decision on the Overseas Association, including Greenland) (OJ L 355, 7.10.2021, p. 6, ELI: <http://data.europa.eu/eli/dec/2021/1764/oj>).

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	<p>(38) Participation of third countries in the ‘Audiovisual’ specific objective requires a certain level of reciprocity and regulatory alignment. For this reason, the situation of their audiovisual markets, the proximity of their legal frameworks with the Union audiovisual media acquis, in particular Directive 2010/13/EU, and the access to their support schemes should shall be taken into consideration when concluding Association Agreements. This is of particular importance concerning other European countries, whose audiovisual works benefit from the provisions of Directive 2010/13/EU that promote European works, notably the quotas system. In the specific case of acceding countries, candidate countries and potential candidates, the requirement to align their national legislations with Directive 2010/13/EU was already included in Regulation (EU) 2021/818 establishing the Creative Europe Programme. This condition has been an efficient incentive to accelerate their work on the overall alignment with the EU acquis in view of accession.</p> <p>IT (Comments): We highlight in art 14 the absence of a binding requirement for AVMS alignment for non-candidate third countries. As this wording has no binding legal effect, it does not oblige the Commission to require full alignment with the AVMS acquis. Alignment with the AVMS Directive is required only for “acceding countries, candidate countries and potential candidates”. No equivalent obligation applies to other types of third countries. Language of recital 38 should be reinforced to ensure alignment with the AVMS Directive</p> <p>FR (Drafting suggestions): (38) Participation of third countries in the ‘Audiovisual’ specific objective requires a certain level of reciprocity and regulatory alignment. For this reason, <u>Association agreements should foresee that third countries</u></p>

Commission proposal	Drafting suggestions and Comments
	<p><u>contribute financially to the Programme. Should they participate to the MEDIA+ ‘Audiovisual’ sub-strand, third countries should</u> the situation of their audiovisual markets, the proximity of their legal frameworks with the Union audiovisual media acquis, in particular Directive 2010/13/EU, and the access to their support schemes should be taken into consideration when concluding Association Agreements. This is of particular importance concerning other European countries, whose audiovisual works benefit from the provisions of Directive 2010/13/EU that promote European works, notably the quotas system. In the specific case of acceding countries, candidate countries and potential candidates, the requirement to align their national legislations with Directive 2010/13/EU, as was already included in Regulation (EU) 2021/818 establishing the Creative Europe Programme, if they participate to the MEDIA+ ‘Audiovisual’ sub-strand. This condition has been an efficient incentive to accelerate their work on the overall alignment with the EU acquis in view of accession.</p> <p>FR (Comments): The French authorities recall that the current programme provides that third countries may only participate in the programme on the condition that they fulfil the requirements of the SMA Directive (Article 9(2) of Regulation 2018/818). They see no valid reason to derogate from this rule if these countries wish to participate in the MEDIA strand.</p> <p>EL (Comments): News media organisations within the European Union are now required to comply with the EMFA Regulation and its associated obligations, such as ownership transparency, funding transparency, and respect for editorial independence. We would therefore appreciate further clarification on how these regulatory expectations will be accommodated with respect to the participation of third-country news media.”</p>

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	<p>LV (Comments): Latvia emphasizes the need for an explicit reference in the recitals and the main text to EU structural dialogue with stakeholders, as outlined in the Cultural Compass and EU Civil Society Strategy.</p> <p>A recital for the committee procedure must be included as well.</p>
<p>(39) Since the objectives of this Regulation cannot be sufficiently achieved by the Member States but can rather, by reason of the transnational nature of the challenges, be better achieved at Union level, the Union may adopt measures, in accordance with the principle of subsidiarity, as set out in Article 5 TEU. In accordance with the principle of proportionality, as set out in that Article, this Regulation does not go beyond what is necessary in order to achieve those objectives.</p>	<p>SI (Drafting suggestions): After first sentence add: “Member States shall be regularly informed about financial allocations and performance indicators by strand.”</p> <p>SI (Comments): Enhances transparency in line with Financial Regulation Articles 34–36 (sound financial management) and ensures coherence between EU and national equality/culture policies. Provides data for subsidiarity monitoring under Article 5 TEU.</p>
<p>(40) This Regulation establishes the Programme [for 2028 to 2034], which succeeds to the Programmes established by Regulations (EU) 2021/692 and (EU) 2021/818 for 2021 to 2027. Regulations (EU) 2021/692 and (EU) 2021/818 should therefore be repealed,</p>	
<p>HAVE ADOPTED THIS REGULATION:</p>	

Commission proposal	Drafting suggestions and Comments
<p>Chapter I</p>	<p>IT (Comments):</p> <p>We are pleased with the planned doubling of resources for culture, audiovisual, and media, and the support for European values, compared to the current Multiannual Financial Framework. However, this represents a meager portion of the EU budget compared to the enormous challenges facing culture.</p> <p>We believe that more ambitious and concrete support from the Union is needed to defend and promote a common European identity.</p>
<p>General provisions</p>	<p>IT (Comments):</p> <p>Regarding the abolition of the Programme Committees, we believe that their presence plays an important role in ensuring that national governments have adequate oversight of the annual work programmes defined by the Commission, as well as in encouraging the inclusion of new emerging themes during the programming period</p> <p>HU (Comments):</p> <p>As in case of the Regulation on Creative Europe programme, it would be appropriate to supplement the Regulation with an annex specifying the concrete actions, which can be supported, as it is currently unclear through which measures the general and specific objectives are to be achieved. In addition, qualitative and quantitative impact indicators for “AgoraEU” and its sub-programmes are also missing.</p>

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<p><i>Article 1</i></p>	<p>IE (Comments): Ireland is of the view that the Regulation should set out the governance, monitoring and reporting arrangements for the Programme, as well as the key actions, and the inclusion of these should be briefly reflected in Article 1</p>
<p><i>Subject matter</i></p>	
<p>This Regulation establishes the ‘AgoraEU’ Programme (the ‘Programme’) and lays down the objectives of the Programme, its budget [for the period 2028-2034], the forms of Union funding and the rules for providing such funding.</p>	<p>DE (Drafting suggestions): This Regulation establishes the ‘AgoraCreative EU’ Programme (the ‘Programme’) [for the period 2028-2034] and lays down the objectives of the Programme, its budget {for the period 2028-2034}, the forms of Union funding and the rules for providing such funding.</p> <p>DE (Comments): Please see commentary above on page 1. The sectoral programs shall be limited to the duration of the MFF 2028-2034 as stated by DE in the AHWP MFF.</p> <p>AT (Comments): The new programme name sounds very general and non-destinctive, as globally there are several initiatives with the same name. It also seems inappropriate for some topics of the programme (especially with respect to fight against gender-based violence). With the change of the brand every 7 years (CERV) repectively 14 years (Creative Europe) there a a risk of a loss of visibility and impact. Therefore we prefer to keep the current programme</p>

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	names for communication purposes for the strands Culture, MEDIA+ and CERV+. Alternatively, AT is open to a descriptive programme name, such as “Culture and Democracy Programme”.
<i>Article 2</i>	
Definitions	<p>PL (Comments): Lack of the target group definition makes the programme addressee unclear. No definition of CCS might result in funding projects not necessarily best from the culture perspective, leading to less targeted and thus less effective support to the sectors. Identification with a specific target group is essential for potential applicant to be sure if they are eligible.</p> <p>SK (Comments): As reflected in the progress report, a definition of the cultural and creative sectors with a non-exhaustive list of sectors, like that in Art. 2 of the current Creative Europe programme regulation, should be added. The non-exhaustive list provides flexibility necessary to respond to future challenges.</p>
For the purposes of this Regulation, the following definition applies:	<p>LV (Drafting suggestions): For the purposes of this Regulation, the following definitions apply:</p> <p>IT (Comments): We believe it is important to include as well a definition to clarify which sectors are included</p>

Commission proposal	Drafting suggestions and Comments
	<p>IE (Comments): It is important that any definition of the cultural and creative sectors is in the form of a non-exhaustive list of the various cultural and creative sectors, as is the case in the current Creative Europe programme, to take account of the fact that many Member States will have different definitions, including some set out in legislation.</p> <p>AT (Comments): We suggest to reintroduce the definition of cultural and creative sectors in this article, additionally to the mention in recital 7. AT supports the proposal of the DK Presidency (annex in the progress report).</p> <p>HU (Comments): HU suggests to indicate definitions with agreed language to all major criteria such as audiovisual, MEDIA+ and others.</p>
	<p>LV (Drafting suggestions): <u>‘cultural and creative sectors’ means all sectors:</u> <u>(a) whose activities, many of which have the potential to generate innovation and jobs in particular from intellectual property:</u> <u>(i) are based on cultural values and artistic and other individual or collective creative expressions; and</u> <u>(ii) include the development, the creation, the production, the dissemination and the preservation of goods and services which embody cultural, artistic or other creative</u></p>

Commission proposal	Drafting suggestions and Comments
	<p><u>expressions, as well as related functions such as education and management;</u> <u>(b) irrespective of:</u> <u>(i) whether the activities of those sectors are market-oriented or non-market oriented;</u> <u>(ii) the type of structure that carries out those activities; and</u> <u>(iii) how that structure is financed</u></p> <p>LV (Comments): Latvia supports the drafting proposal of the CCS definition by the Presidency.</p> <p>From Latvia’s perspective, the definition included in Article 2 of the current “Creative Europe” (2021–2027) regulation has provided added value not only for EU cultural policy planning but also for ensuring targeted support. In the context of still relatively limited funding, where cultural content projects compete for support, it is necessary to clearly define the relevant sectors. Although cultural and creative sectors are in constant development, the boundaries of the sector can generally be clearly defined and linked to the specifics of cultural heritage, professional arts, or creative industries. It is important to maintain the list of cultural fields to be defined in the main text of the regulation, rather than only in the recitals, in order to strengthen the definition as the basis for eligibility criteria in the “AgoraEU” project calls.</p>
<p>‘award procedure’ means an award procedure, as defined in Article 2, point (3), of Regulation (EU, Euratom) 2024/2509, as well as procedures for entrusting the implementation and provision of support through financial instruments, for granting the budgetary guarantee, or for providing support under the budgetary guarantee.</p>	<p>BE (Drafting suggestions): <u>‘cultural and creative sectors’ means all sectors: (a) whose activities, many of which have the potential to generate innovation and jobs in particular from intellectual property: (i) are based on cultural values and artistic and other individual or collective creative expressions; and (ii) include the</u></p>

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	<p><u>development, the creation, the production, the dissemination and the preservation of goods and services which embody cultural, artistic or other creative expressions, as well as related functions such as education and management: (b) irrespective of: (i) whether the activities of those sectors are market-oriented or non-market oriented; (ii) the type of structure that carries out those activities; and (iii) how that structure is financed</u></p> <p>BE (Comments):</p> <p>We are worried about the lack of definitions to clarify the scope of the regulation. We believe it is important that the target groups and sectors within the different strands in this programme are clearly defined in the regulation.</p>

Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 3</i></p>	<p>LV (Comments):</p> <p>We have some concerns regarding the proposed “MEDIA+” strand. At present, it brings together two distinct policy areas – the audiovisual sector and news media. In the previous generation of the programme, the “Culture” and “MEDIA” strands were merged under Creative Europe, a process that required several years before the name and concept became well recognised. Latvia would like to clarify whether this issue has been considered.</p> <p>In order to preserve the identity of the current “MEDIA” strand as well as to ensure clarity, stability, predictability and visibility both for the audiovisual sector and news media, Latvia considers it would be valuable to explore the possibility of dividing the “MEDIA+” strand into two distinct stands – “MEDIA” and “NEWS+”.</p> <p>Such an approach would preserve the internationally recognised MEDIA brand, avoid overlaps between initiatives, and ensure clearer communication with the sectors and professionals. It would also give news media a more prominent role within the programme’s structure.</p> <p>BE (Comments):</p> <p>It would be appropriate to incorporate certain elements from Chapter 10, particularly to strengthen the cross-cutting dimension. We could even consider an additional cross-cutting strand. This would better reflect the links between the different sectors and strands.</p>

Commission proposal	Drafting suggestions and Comments
<p>Programme objectives</p>	<p>PL (Comments): We believe it is important to also include the protection and promotion of common European cultural heritage (tangible and intangible) in the programme objectives.</p>
<p>(1) The general objectives of the Programme are to promote cultural and linguistic diversity and heritage, to increase the competitiveness of the cultural and creative sectors, in particular the media and audiovisual industries, to safeguard artistic and media freedom, and to protect and promote equality, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p>	<p>PL (Drafting suggestions): The general objectives of the Programme are to promote cultural and linguistic diversity, tangible and intangible heritage, to increase the competitiveness of the cultural and creative sectors, in particular the media and audiovisual industries, to safeguard artistic and media freedom, and to protect and promote equality, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p> <p>PL (Comments): We find it necessary to indicate here both tangible and intangible heritage. In our opinion safeguarding artistic and media freedom should be the rule of the award procedure, not the programme objective.</p> <p>IT (Drafting suggestions): (1) The general objectives of the Programme are to safeguard, develop and promote cultural and linguistic diversity and heritage, to increase the competitiveness of the cultural and creative sectors, in particular the media and audiovisual industries sectors, to safeguard artistic and media freedom, and to protect and promote equality, active citizenship, rights and values as</p>

Commission proposal	Drafting suggestions and Comments
	<p>enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p> <p>IT (Comments):</p> <p>We propose to integrate a reference to the safeguarding of Europe’s heritage, in line with Art.3.3. TUE “The Union and Art. 167.2 TFUE, in continuity with Art.3 1(a) of the current Creative Europe Regulation and building on the results of the 2018 European Year of Cultural Heritage We also suggest to broaden to “media and audiovisual sectors”.</p> <p>IE (Drafting suggestions):</p> <p>(1) The general objectives of the Programme are to promote cultural and linguistic diversity and heritage, to increase the competitiveness of the cultural and creative sectors, in particular the media and, audiovisual and audio industries, to safeguard artistic and media freedom and media pluralism, and to protect and promote equality, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p> <p>IE (Comments):</p> <p>While Article 6(b) – covering the News strand – explicitly addresses media plurality, Ireland considers that it would be appropriate to reference it in the programme objectives given it is explicitly referenced alongside media freedom in Article 11 CFREU.</p> <p>Ireland also proposes to include a reference to audio in the general objective, noting the increasing presence of new mechanisms such as podcasts, as well</p>

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	<p>as the need to support local high quality news providers, such as radio broadcasters</p> <p>HR (Drafting suggestions):</p> <p>The general objectives of the Programme are to promote cultural and linguistic diversity and heritage, to increase the competitiveness of the European cultural and creative sectors, in particular the media and audiovisual industries, to safeguard artistic and media freedom, and to protect and promote equality, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p> <p>DE (Drafting suggestions):</p> <p>(1) The general objectives of the Programme are to promote cultural and linguistic diversity and heritage, to increase the competitiveness of the cultural and creative sectors, in particular the media and audiovisual industries, to safeguard artistic and media freedom, and to protect and promote equality, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation, a culture of innovation and societal resilience.</p> <p>DE (Comments):</p> <p>This multifaceted “side effect” of creativity and open-mindedness is often forgotten.</p> <p>AT (Drafting suggestions):</p> <p>(1) The general objectives of the Programme are to <u>safeguard and</u> promote cultural and linguistic diversity and heritage, to increase the competitiveness <u>and innovation</u> of the cultural and creative sectors, in</p>

Commission proposal	Drafting suggestions and Comments
	<p>particular the media and audiovisual industries, to safeguard artistic and media freedom, and to protect and promote equality, <u>gender equality</u>, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p> <p>AT (Comments): We suggest to add innovation and gender equality under general objectives, like in the current Regulations on Creative Europe and CERV.</p> <p>HU (Drafting suggestions): The general objectives of the Programme are to safeguard, develop and promote <u>European</u> cultural and linguistic diversity and heritage, to increase the competitiveness of the cultural and creative sectors, in particular the media and audiovisual industries, to safeguard artistic and media freedom, and to protect and promote equality, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p> <p>HU (Comments): We suggest aligning this Article with the current text of the Creative Europe regulation (Regulation 818/2021/EU).</p> <p>NL (Drafting suggestions): 1) The general objectives of the Programme are to promote cultural and linguistic diversity and heritage, to increase the competitiveness of the cultural and creative sectors, including the media and audiovisual industries, to safeguard artistic and media freedom, and to protect and promote equality, active citizenship, rights and values as enshrined in the Treaties and in the Charter, thereby enhancing democratic participation and societal resilience.</p>

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	NL (Comments): Fair and open competition is an aspect of all healthy cultural and creative industries, of which the audiovisual sectors and media are a part.
(2) Within the general objectives set out in paragraph 1, the Programme shall have the following strands, implementing the following specific objectives:	
(a) the ‘Creative Europe - Culture’ Strand shall:	PL (Drafting suggestions): ii. contribute to safeguarding and supporting European heritage (both tangible and intangible) as key elements of European identity and remembrance on the one hand and factor of territorial, social and economic development (including tourism) on the other; PL (Comments): We believe one point here does not reflect the richness of the culture sector. For instance, safeguarding tangible and intangible heritage, growth of innovation and creativity are missing. NB – creativity is not just the added value of the culture project, it should be one of its distinctives. Current provisions visibly undermine and diminish the «Culture» strand, especially when in comparison to the other two strands.
i. contribute to cross-border cultural creation, cooperation, participation and accessibility, and cross-border circulation of a diversity of cultural works, while strengthening the social,	PL (Drafting suggestions):

Commission proposal	Drafting suggestions and Comments
<p>economic and international dimensions of the cultural and creative sectors ('culture');</p>	<p>contribute to cross-border cultural creation, cooperation, participation and accessibility, and cross-border circulation of a diversity of cultural works, while strengthening the social, economic and international dimensions of the cultural and creative sectors and their importance in building and maintaining a common European identity ('culture');</p> <p>PL (Comments): We suggest also to bring out the importance of culture for maintaining and building the European identity.</p> <p>LV (Drafting suggestions): i. contribute to cross-border cultural creation, cooperation, access, participation and accessibility, and cross-border circulation of a diversity of cultural works, while strengthening the social, economic and international dimensions of the cultural and creative sectors ('culture');</p> <p>LV (Comments): Does the term "accessibility" cover both access to culture and the accessibility of culture? If not, we propose the following drafting suggestion.</p> <p>IT (Drafting suggestions): i. contribute to cross-border cultural creation, cooperation mobility, participation and accessibility and cross-border circulation of a diversity of European cultural works, while promoting caring, access to and participation in culture and cultural heritage, fostering sustainable innovation and wellbeing and strengthening the social, economic and international dimensions of the cultural and creative sectors ('culture');</p> <p>IT</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>We propose to include a reference on support to creation of European cultural and creative content, similarly to the MEDIA + strand.</p> <p>We propose to include “caring” to include a more people/community - oriented approach. We also propose to separate “cross-border” actions from participation since it can also have a local dimension.</p> <p>We finally propose to include keywords where EU brings important added value: sustainable innovation and mobility. Concerning “innovation” we stress that culture contributes to “social innovation” complementing and not overlapping with EU R&I programmes</p> <p>IE</p> <p>(Comments):</p> <p>Ireland welcomes the continued focus on core Creative Europe objectives to support creation, cooperation, participation and accessibility, as well as the cross-border circulation of works. It will be important to ensure that the core work to support culture based on its intrinsic value is not diluted with the addition on new thematic priorities.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>. contribute to cross-border cultural creation and cultural mediation, cooperation, participation and accessibility, and cross-border circulation of a diversity of cultural works, while fostering the intrinsic value of culture and artistic expression as well as strengthening the social, economic and international dimensions of the cultural and creative sectors (‘culture’);</p> <p>DE</p> <p>(Comments):</p> <p>Relevant specific objectives, such as innovation and mobility, have been partially reduced compared to the previous Creative Europe Regulation (see Article 3 (2) of Regulation (EU) 2021/818). Nevertheless, innovation and</p>

Commission proposal	Drafting suggestions and Comments
	<p>mobility are included further down – see Article 4, which specifically addresses the Culture Strand – which is welcomed. However, as a precautionary measure, it is suggested that congruence be established between these two Articles. /</p> <p>Also, cultural mediation as well as the intrinsic value of culture and artistic expression should be included in the list.</p> <p>AT (Drafting suggestions):</p> <p>i. contribute to cross-border <u>artistic and cultural cooperation</u> creation, cooperation, participation and accessibility, and cross-border circulation of a diversity of cultural works, while strengthening the social, economic and international dimensions of the cultural and creative sectors (‘culture’);</p> <p>AT (Comments):</p> <p>We suggest to mention cooperation in the first place, as cooperation projects are the heart of the Culture strand.</p> <p>HU (Drafting suggestions):</p> <p>i. contribute to and enhance cross-border cultural creation, cooperation, participation and accessibility, and cross-border circulation of a diversity of cultural works, while strengthening the social, economic and international dimensions of innovation in Europe’s the cultural and creative sectors (‘culture’) and enhancing mobility of professionals;</p> <p>HU (Comments):</p> <p>We suggest aligning this Article with the current text of the Creative Europe regulation (Regulation 818/2021/EU). Another phrasing for the insertion of mobility in the text would be acceptable for us as well but we would definitely like to see the mention of it in some form.</p>

Commission proposal	Drafting suggestions and Comments
	<p>NL (Drafting suggestions):</p> <p>i. contribute to cross-border cultural creation, cooperation, participation and accessibility, and cross-border circulation of a diversity of cultural works, while strengthening the social, economic and international dimensions of the cultural and creative sectors ('culture');</p> <p>ii. contribute to a free, viable and diverse Union cultural ecosystem, notably by supporting free and independent cultural production in all its diversity, enhancing citizens' access to culture in all forms, both online and offline.</p> <p>NL (Comments):</p> <p>Please add (ii.) that also guarantees artistic freedom, including online and in digital form, just like in the Media Plus strand.</p>
<p>(b) the 'MEDIA+' strand shall:</p>	<p>PL (Drafting suggestions):</p> <p>iii. strengthen the mechanisms supporting the presence of European films and series on foreign markets, especially within the framework of mobility, co-production and streaming platforms, strengthening their competitiveness towards global ones.</p> <p>iv. place particular emphasis on supporting independent producers and other entities involved in audiovisual production (including broadcasters)</p> <p>PL (Comments):</p>

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	<p>Per analogiam to the previous point – we suggest to follow the pattern with «Creative Europe – Media ».</p> <p>We suggest adding two points :</p> <p><i>iii. strengthen the mechanisms supporting the presence of European films and series on foreign markets, especially within the framework of mobility, co-production and streaming platforms, strengthening their competitiveness towards global ones.</i></p> <p><i>iv. place particular emphasis on supporting independent producers and other entities involved in audiovisual production (including broadcasters)</i></p> <p>Independent producers – the vast majority of whom are small and medium-sized enterprises – play a key role in building a community based on European understanding and identity, while simultaneously counterbalancing the dominance of commercial global formats. In this context, it should be emphasized that the lack of the "independent producer criterion" in the "Agora EU" program project may raise concerns about the potential weakening of the position of entities that the current MEDIA program has particularly protected and supported</p> <p>IT (Drafting suggestions):</p> <p>the Creative Europe ‘MEDIA+’ strand shall:</p> <p>IT (Comments):</p> <p>In analogy with the formulation of the Culture strand</p>
<p>i. contribute to the cultural diversity and competitiveness of the audiovisual and video games industries, notably by enhancing creation and cross-border distribution of European content and its access by citizens (‘audiovisual’);</p>	<p>PL (Drafting suggestions):</p> <p>(2)(b)(i) contribute to the cultural diversity and competitiveness of the audiovisual and video games industries, with particular emphasis on the</p>

Commission proposal	Drafting suggestions and Comments
	<p>independent production sector, notably by enhancing creation and cross-border distribution of European content and its access by citizens ('audiovisual');</p> <p>PL (Comments):</p> <ol style="list-style-type: none"> 1. In our view, « enhancing creation » is also the aim of the Culture strand and one of the main features of the culture projects. 2. Independent production constitutes a cornerstone of the European audiovisual ecosystem, ensuring cultural diversity, pluralism, and artistic originality. Supporting independent producers, in particular small and medium-sized enterprises, is essential for safeguarding the diversity of European stories and perspectives and for strengthening European identity and creative freedom. <p>IT (Drafting suggestions):</p> <p>contribute to the cultural diversity and competitiveness of the film, audiovisual and video games industries sectors, notably by enhancing development, creation, promotion and cross-border distribution of European content works and its access by citizens ('audiovisual');</p> <p>IT (Comments):</p> <p>IT proposes a more detailed formulation to take account of the specific nature of the film and audiovisual sector and the various stages in the life cycle of a work.</p> <p>HR (Drafting suggestions):</p> <p>contribute to the cultural diversity and competitiveness of the European audiovisual and video games industries, notably by enhancing creation and</p>

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	<p>cross-border distribution of European content and its access by citizens ('audiovisual');</p> <p>DE (Drafting suggestions):</p> <p>i. contribute to the cultural diversity and competitiveness of the audiovisual, including film, and video games industries, notably by enhancing creation and cross-border distribution of European content and its access by citizens ('audiovisual');</p> <p>DE (Comments):</p> <p>Film has been at the core of the MEDIA funding since the beginning. Although it is part of the audiovisual industry, we suggest to emphasize its importance in explicitly mentioning the film sector alongside the audiovisual and gaming sector.</p> <p>AT (Drafting suggestions):</p> <p>i. contribute to the cultural <u>and linguistic</u> diversity and competitiveness of the audiovisual <u>sector</u> and video games industries, notably by enhancing creation and cross-border distribution of European content <u>audiovisual works</u> and its access by citizens ('audiovisual');</p> <p>AT (Comments):</p> <p>Please add linguistic diversity. Terms from the current MEDIA strand should be retained.</p> <p>NL (Drafting suggestions):</p> <p>i. contribute to the cultural diversity and competitiveness of the audiovisual industries and digital culture industries, including video games and</p>

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	<p>Xtended Reality, notably by enhancing creation and cross-border distribution of European content and its access by citizens ('audiovisual');</p> <p>NL (Comments):</p> <p>The new and quickly developing field of digital culture is much broader than just video games. It encompasses virtual reality, augmented reality, and immersive experiences, all under the umbrella term XR.</p>
<p>ii. contribute to a free, viable and diverse Union information ecosystem, notably by supporting free and independent journalism and news media, enhancing citizens' access to trustworthy information and tackling disinformation ('news');</p>	<p>LV (Drafting suggestions):</p> <p>ii. contribute to a free, viable and diverse Union information ecosystem, notably by supporting free and independent journalism and news media, enhancing citizens' access to trustworthy information and tackling disinformation ('news');</p> <p>IT (Drafting suggestions):</p> <p>ii. contribute to a free, viable and diverse Union information ecosystem, notably by supporting news media, including the press sector, free and independent journalism and news media, enhancing citizens' access to trustworthy information, preventing news deserts, and tackling disinformation ('news');</p> <p>IT (Comments):</p> <p>IT welcomes the provision of a specific, distinct objective regarding the news sector. Audiovisual and news media face different challenges and the rationale for support is grounded on different bases. It is also true that the current funding programmes have struggled to respond to emerging challenges faced</p>

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	<p>by news media and quality journalism, challenges that have dramatically scaled since such programs were conceived.</p> <p>As far as the focus of the "news" objective is concerned, we believe that financial support to the media sector should come first because it is a precondition for all the other actions contained in this objective.</p> <p>A strong, plural, free and independent media system, together with quality journalism, rely on the sustainability of the sector.</p> <p>Therefore, we propose that the AgoraEU program support the economic sustainability and the enhancement of the news sector as the most urgent priority among the topics proposed for the news sector.</p> <p>IE (Comments):</p> <p>Ireland welcomes the inclusion of a News Media objective in the proposal. This is particularly important for independent, small, local and regional organisations that are vital sources of accurate news and information for their communities. It is important for media independence and plurality that actions under this objective support such small and local media organisations and that supports are not just focussed on large transnational actions that can mainly benefit larger and multinational news organisations</p> <p>BE (Comments):</p> <p>These initiatives must take into account freedom of expression.</p> <p>HU (Comments):</p> <p>Please clarify and align the meaning of “media freedom” between Article 3 (1) and Article 3 (2)(b)ii. Please also clarify if media types other than “News” can get support from the Programme. We suggest to shift those eligible for support be listed here instead of the recitals.</p>
	LV

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	<p>(Drafting suggestions):</p> <p><u>(c) the ‘NEWS+’ strand shall:</u></p> <p><u>i. contribute to a free, viable and diverse Union information ecosystem, notably by supporting free and independent journalism and news media, enhancing citizens’ access to trustworthy information and tackling disinformation (‘news’);</u></p> <p>LV (Comments): Please see comment regarding Article 3.</p>
<p>(c) the Democracy, Citizens, Equality, Rights and Values (‘CERV+’) strand shall:</p>	<p>LV (Drafting suggestions):</p> <p><u>(d e) the Democracy, Citizens, Equality, Rights and Values (‘CERV+’) strand shall:</u></p> <p>IE (Comments): Ireland welcomes the retention of funding for CERV and its inclusion as a discrete strand within the proposed AgoraEU programme. However, it is important that the focus and funding of CERV is not diluted once merged into a bigger programme. It is not clear for instance how the funding of cross cutting proposals as highlighted in the Commission proposal might impact on the availability of funding for CERV specific proposals</p>
<p>i. contribute to protecting and promoting fundamental rights, equality and non-discrimination and Union citizen’s rights enshrined in the Treaties including free movement of citizens, and empowering civil society (‘rights, equality, citizens and civil society’);</p>	<p>LV (Drafting suggestions):</p> <p>i. contribute to protecting and promoting fundamental rights and values, equality and non-discrimination and Union citizen’s rights enshrined in the</p>

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	<p>Treaties including free movement of citizens, and empowering civil society ('rights, equality, citizens and civil society');</p> <p>LV (Comments):</p> <p>We would like to receive more clarification regarding the rationale behind the specific emphasis on the free movement of citizens in this point.</p> <p>IE (Comments):</p> <p>There are four pillars or objectives under CERV currently</p> <ol style="list-style-type: none"> i. equality, rights and gender equality (non- discrimination) ii. citizen engagement and participation iii. fighting violence (gender and against children) [Daphne]and iv. protecting and promoting union values. <p>The new framing of objective (i) brings together protecting and promoting fundamental rights and equality and non-discrimination which is welcome. Ireland is committed to protecting and promoting EU fundamental rights, as enshrined in the EU Charter of Fundamental Rights.</p> <p>An explicit reference to fundamental rights as enshrined in the Charter would therefore strengthen this high level articulation of objective (i). This is particularly the case given that there is a specific reference to citizens rights (a narrower set of rights) as enshrined in the Treaties.</p> <p>The incorporation of a reference to empowering civil society in objective (i) is also welcome reflecting Irelands commitment to a vibrant civil society and the protection of civic space and the development of an EU civil society strategy.</p> <p>FI (Drafting suggestions):</p>

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	<p>i. contribute to protecting and promoting fundamental rights, equality, including gender equality, and non-discrimination and Union citizen's rights enshrined in the Treaties including free movement of citizens, and empowering civil society ('rights, equality, citizens and civil society');</p> <p>FI (Comments): We suggest adding "including gender equality", as it is important to define gender equality as a specific objective together with fundamental rights, equality and non-discrimination as in the current CERV Programme.</p> <p>AT (Drafting suggestions):</p> <p>i. contribute to protecting and promoting fundamental rights, equality, <u>including gender equality</u>, and non-discrimination and Union citizen's rights enshrined in the Treaties including free movement of citizens, and empowering civil society ('rights, equality, citizens and civil society');</p> <p>AT (Comments): Add gender equality.</p> <p>NL (Drafting suggestions):</p> <p>contribute to protecting and promoting fundamental rights, equality including gender equality and non-discrimination and Union citizen's rights enshrined in the Treaties including free movement of citizens, and empowering civil society ('rights, equality, citizens and civil society');</p> <p>NL (Comments): We suggest adding "including gender equality" after equality, as it is important to define gender equality as a specific objective in the CERV+</p>

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	strand together with fundamental rights, equality and non-discrimination as in the current CERV Programme.
<p>ii. contribute to fighting against gender-based violence, violence against children and other groups at risk of such violence ('Daphne');</p>	<p>IE (Comments): A continued focus on gender based violence and violence against children is welcome as is the reference to other groups at risk of such violence</p>
<p>iii. contribute to enhancing democratic participation and upholding the rule of law ('democratic participation and rule of law').</p>	<p>IE (Comments): The focus on democratic participation and rule of law is welcome in objective (iii). However, there is no explicit mention of protecting and promoting union values, which is a discrete pillar (pillar v) under the current CERV programme. While protecting and promoting union values may be perceived to be implicit in this new framing of objectives (i) and (iii), a clearer and more explicit reference to protecting and promoting EU values (article 2 Treaty of the EU) would strengthen the focus on rule of law and democratic participation. HR (Drafting suggestions): iii. contribute to enhancing active civic engagement, democratic participation and upholding the rule of law ('democratic participation and rule of law').</p>
	<p>SI (Drafting suggestions):</p>

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	<p>Add new point (iv): “supporting independent civil-society organisations, including through re-granting and micro-grant schemes, to enhance participation at local level.”</p>
<p>(3) To maximise impact and enhance synergies across the strands referred to in paragraph 2, the Programme shall support cross-cutting and horizontal activities contributing to the general objective referred to in paragraph 1, notably by developing synergies between the cultural, media and civic spheres and promoting cross-sectoral collaboration and innovation.</p>	<p>PL (Comments): Synergies are valuable, but at the same time it is essential to ensure independence and full autonomy of the three strands.</p> <p>How these synergies will look like in practise? What will be the source of financing of the projects combining both (or even three) strands since all three strands have separate budgets? Will there be a limit to these cross-cutting projects? Who is going to be decisive in setting the limit and how will it be defined – by the number of projects, budget? Not defining the restrains to these cross-cutting and horizontal activities might dilute the culture strand uniqueness. How the culture sector budget will be secured against projects not contributing mainly to its purposes ?</p> <p>It is important to ensure that there is clarity on the funding for all strands of the programme to ensure certainty and transparency in the management and operation of the programme. The indicative allocation of funds between program components raises concerns that the programme’s implementation could lack predictability and transparency, including from a financial perspective. Therefore, we advocate that when adopting the multiannual financial framework, the financial envelope for each strand be precisely defined with no possibility of transferring funds between them. As for the cross-sectoral strand – transparency of the financing rules is called for.</p> <p>It is essential that the specific requirements and needs of the funding areas and recipients are consistently addressed – dilution between the action programs or sub-programs must be prevented.</p> <p>IE (Comments):</p>

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	<p>Cross-cutting actions between culture/media and civic sectors would represent a significant new addition to previous Creative Europe and CERV programmes. We note that the Commission has stated it would be funded through the Culture, Media+ and CERV strands but it will be important to ensure that there is clarity on the funding for all strands of the programme to ensure certainty and transparency in the management and operation of the programme. Clear parameters for the cross-cutting initiatives are required.</p> <p>The bundling of three discrete programmes into one new programme and the synergies between them warrants further clarification. From an equality and fundamental rights perspective, the inclusion of enhancing citizens access to trustworthy information and tackling disinformation as an objective in the Media+ strand is welcome. At face value, this offers potential for synergies between the Media + objective (ii) [news media], and CERV objective (iii) [enhancing democratic participation and upholding rule of law].</p> <ul style="list-style-type: none"> • The synergies between other two CERV two objectives [(i) fundamental rights and non-discrimination and (ii) gender-based violence and violence against children and other groups with the Media +, or with the Culture strand are less clear. <p>Ireland is committed to ensuring that dedicated funding for the CERV+ objectives continues to be available and sufficient. In the current context it is also important that CERV+ funding continues to empower civil society to protect and promote fundamental rights, equality and non-discrimination (objective (a)) in line with the Commission Strategy to Strengthen the Application of the Charter of Fundamental Rights in the EU</p> <p>CZ (Drafting suggestions):</p>

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	<p>(3) To maximise impact and enhance synergies across the strands referred to in paragraph 2, the Programme shall support cross-cutting and horizontal activities contributing to the general objective referred to in paragraph 1, notably by developing synergies between the cultural, media and civic spheres of culture, media and Union values and promoting cross-sectoral collaboration and innovation.</p> <p>CZ (Comments):</p> <p>We propose this change to better cover the CERV+ strand and its topics in the proposal. We assume, that the synergies and collaboration shall cover all the strands in the proposal. Whereas the terms “cultural sphere” and “media sphere” are quite comprehensive and self-explanatory in covering the whole culture and media+ strands, this is in our opinion not the case of the term “civic sphere”. This term is in our opinion connected mainly the topic of “civic life”, “civic engagement”, “civic participation” etc. (as also used in the proposal), e.g. activities of citizens, which form only a part of the whole CERV+ strand, as covered by the present CERV programme and Art. 3 par 2 (c) and Art. 7 – 9 of the proposal. This term may not cover for examples activities of public institutions in protection and promotion of fundamental rights or the rule of law which are supported by the CERV programme and shall be in our view supported also by the AgoraEU programme (see Art. 10 (c)). Therefore, we propose an alternative term of Union values as defined by Article 2 of the TEU which in our opinion covers all the topics of the CERV+ strand. Alternatively, the issue can be explained in the Art. 2 on definitions or in a recital.</p> <p>AT (Comments):</p> <p>AT welcomes the support for horizontal and cross-cutting activities. Will there be special calls, like the Lab? Where are they budgeted? Or will</p>

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	<p>horizontal activities be eligible in all strands to a certain extent and earmarked budget?</p> <p>NL (Drafting suggestions):</p> <p>3) To maximise impact and enhance synergies across the strands referred to in paragraph 2, the Programme shall support cross-cutting and horizontal activities contributing to the general objective referred to in paragraph 1, notably by developing synergies between the cultural, media and civic spheres allocating an earmarked budget and promoting cross-sectoral collaboration and innovation. The objective of fostering synergies among the objectives of AgoraEU shall, however, not prejudice, disadvantage or otherwise limit the eligibility or assessment of project proposals that focus exclusively on a single objective of AgoraEU.</p> <p>NL (Comments):</p> <p>The objective of cross-cutting and horizontal activities must imperatively have a separately allocated, earmarked budget in order to (1) value these types of activities and (2) not impair artistic and editorial freedom.</p> <p>Synergies between the three strands of AgoraEU may be encouraged, however, this aim should not hinder project proposals that focus exclusively on the objectives of only one of the strands, i.e. if an organisation applies for CERV+ funding for work on fundamental rights and rule of law, they shall not be obliged to also have a culture or media element in order to be eligible for funding. Therefore NL requests an addition to this article.</p>

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<p style="text-align: center;">Chapter II</p>	<p>DE (Comments):</p> <p>1. For GER it is essential - and helpful as a guideline - to list the various categories of programme measures in an appendix and describe them in more detail (as is already the case under Creative Europe: Appendix I). In this way, categories of measures can be defined for each strand and their implementation monitored. Without such an Appendix the proposal seems hardly be approvable.</p> <p>2. Although it is to be decided as a horizontal question it should be noted here that the indicative amount or approximate indicative percentage of the budget allocated to sector-specific measures (the three different strands) should be outlined in the regulation.</p>
<p style="text-align: center;">Creative Europe - Culture strand</p>	

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<p><i>Article 4</i></p>	<p>LV (Comments): Latvia believes that further clarification on whether “AgoraEU” will continue to provide targeted support to specific cultural and creative sectors, such as music, fashion and design, architecture, and the New European Bauhaus. Latvia supports the idea of an annex that could offer a more detailed overview of the initiatives described in Article 4.</p> <p>IE (Comments): Ireland reiterates our concern about lack of clarity on the role of Programme Committees in development of annual Work Plans under this new structure and lack of detail of roles for MSs in governance.</p> <p>We also note that the proposal does not include detail on the actions or measures to deliver the objectives of the programme and that the Commission has stated that this is to maintain flexibility in order to make adjustments in response to issues arising. However, Ireland considers it important to set out certain key measures or actions in the Regulation - including reference to current successful programmes such as Culture Moves Europe - for delivery under periodic work programmes to ensure transparency, and monitoring on the achievement of deliverables, while possibly including some scope for flexibility in terms of actions and associated funding to respond to urgent or new issues arising.</p> <p>BE (Comments): Cooperation projects are not explicitly mentioned in the text, unlike Platforms for the promotion of emerging artists, European Networks, or the European Capitals of Culture (ECOC). Instead, the priority of the Culture strand is described more broadly as support for exchanges and cooperation in various forms, including residencies and partnerships between organisations of all sizes. Why is the most successful call of CE not mentioned?</p>
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	<p>AT (Comments):</p> <p>As there is unfortunately no information on concrete actions (as Annex I of the current regulation) we kindly ask the COM for a corresponding working document in order to be able to consult national stakeholders who also need predictability on future EU funding possibilities. Consequently, this article needs to be broadly defined, but still clear enough, in order not to lose any important actions.</p>
<i>Culture</i>	
<p>Within the Creative Europe - Culture strand, the 'Culture' specific objective, covering the cultural and creative sectors, shall focus on:</p>	<p>PL (Drafting suggestions):</p> <p>4 *. supporting cultural heritage, both tangible and intangible,</p> <ul style="list-style-type: none"> a) strengthening the regional and local dimensions of the cultures of the European Union countries; b) fostering cross-border cooperation in the field of cultural heritage; c) improving access to cultural heritage; <p>supporting initiatives like European Capital of Culture and European Heritage Label, European Union Youth Orchestra or Europa Nostra initiatives, as well as increasing of the Melina Mercouri prize.</p> <p>PL (Comments):</p> <p>We would like to add the second priority reflecting (added above) Art. 3(2)(a)ii related to both tangible and intangible cultural heritage.</p> <p>IT (Comments):</p>

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	<p>We appreciate that the Creative Europe – Culture strand retains its core objectives and funding schemes</p> <p>Special attention should also be given to support transnational cooperation on cultural heritage, tangible, intangible, including underwater, inter alia by enhancing its safeguarding, enjoyment, accessibility, engagement and promoting inclusion, including via digital technologies, in line with the principle of subsidiarity.</p> <p>Cultural heritage should also be recognised as a key element of Europe’s historical memory and identity, a driver of sustainable and innovative “blue” tourism, and a strategic resource for innovation, cooperation, environmental protection, cultural education, and community development</p> <p>DE (Comments):</p> <p>The role of libraries in cultural participation, media and information literacy, reading promotion and lifelong learning could be emphasized more strongly in the cultural sector.</p> <p>HU (Comments):</p> <p>In general, it can be stated that it is currently very difficult to take a clear position on this part of the draft, as the EU’s cultural work plan for the period after 2026 is not yet known. A well-founded opinion can only be formed once that plan is available.</p> <p>Article 4 of the draft regulation for the AgoraEU programme, unlike the ongoing regulation governing the Creative Europe programme, does not include a reference to specific actions in the Annex. On the contrary, it sometimes lists concrete actions as <i>objectives</i> (e.g. touring initiatives, festivals), which is a rather questionable approach. It would therefore be advisable to complement this article — and indeed the entire regulation — with a reference to concrete actions, since at present it is unclear how the</p>

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	<p>various objectives are to be achieved or what exactly the Commission means by each of them.</p> <p>SI (Drafting suggestions): Within the Creative Europe - Culture strand, the ‘Culture’ specific objective, covering the artistic and professional excellence in cultural and creative sectors, shall focus on:</p> <p>SI (Comments): We believe that supporting artistic and professional excellence should be the most most important specific objective in Article 4.. This ensures that all high-quality projects are selected, including those from applicants of languages with a small number of speakers and those with limited financial capacities.</p>
<p>(a) fostering cross-border creation, cooperation and exchanges across various formats, including through the mobility of artists and cultural and creative professionals, artistic residencies, as well as partnerships between organisations of all sizes;</p>	<p>PL (Drafting suggestions): fostering European cross-border creation, cooperation and exchanges across various formats, including through the mobility of artists and cultural and creative professionals, artistic residencies, as well as partnerships between organisations of all sizes</p> <p>PL (Comments): We suggest to add «European » each time cross-border cooperation is mentioned.</p> <p>LV (Drafting suggestions):</p>

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	<p>(a) fostering cross-border creation, cooperation and exchanges across various formats, including through the mobility of artists and cultural and creative professionals, artistic residencies, as well as partnerships between organisations of all sizes, <u>including micro-organisations and small-sized organisations</u>;</p> <p>LV (Comments):</p> <p>Latvia would like to emphasize the importance of simplified support mechanisms for micro-organizations, as well as the continued provision of higher co-financing rates for small-scale projects. Our experience shows that organizations with limited capacity are capable of implementing high-quality and innovative projects. The current “Creative Europe” programme serves as a valuable launchpad for such organizations, enabling them to develop competitive international projects through high-intensity co-financing and opportunities to attract national funding. Therefore, we strongly support maintaining this direction in the new programme.</p> <p>Also, does the term “organisations of all sizes” also include micro-organisations and/or grassroots organisations? We also note that the Explanatory Memorandum refers to obstacles faced by grassroots organisations and first-time applicants, which are to be addressed through targeted simplification measures, enhanced communication, and improved promotion of funding opportunities. We would appreciate further clarification on where and how these measures are foreseen within the Programme text, and in which specific sections or implementation tools these actions will be operationalised.</p> <p>IT (Drafting suggestions):</p> <p>(a) fostering cross-border creation, cooperation and exchanges of cultural works and expressions across various formats, enhancing</p>

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	<p>European cultural and creative content, including through the mobility of artists and cultural and creative professionals, artistic residencies, as well as partnerships between organisations of all sizes</p> <p>IT (Comments): We welcome the reference to mobility We propose to highlight the importance of the creation of European cultural and creative content (link to 4c) We ask to clarify the meaning of “across various formats”, do we mean physical and digital? Or what else?</p> <p>IE (Drafting suggestions): “fostering cross-border creation, cooperation and exchanges across various formats, through the mobility of artists and cultural and creative professionals, artistic residencies, as well as partnerships between organisations of all sizes, including in particular small/medium organisations”</p> <p>IE (Comments): Ireland welcomes this. Fostering artistic mobility has been one of the key achievements of Creative Europe to-date. Evaluation of the current programme has highlighted how effective this has been and also the scale of demand on the programmes. Additional resourcing for this area will be required under the new Programme. Ireland also welcomes the focus on “partnerships between organisations of all sizes”. It is particularly important to ensure that small and medium sized cultural organisations have access to funding under the programme</p> <p>AT</p>

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	<p>(Drafting suggestions):</p> <p>(a) fostering cross-border <u>cooperation</u>, creation, cooperation and exchanges across various formats, including through <u>cooperation projects</u>, the mobility of artists and cultural and creative professionals, artistic residencies, as well as partnerships between organisations of all sizes, <u>including micro- and small-sized organisations</u>;</p> <p>AT</p> <p>(Comments):</p> <p>Mention cooperation at first place and cooperation projects explicitly, as they are the “heart” of the Culture Strand. Guarantee that small organisations still have access to the EU programme (and dedicated budget to be anchored in the work programme).</p> <p>How does COM intend to foster partnerships between organisations of all sizes? By a special requirement in calls? Capping turns out to be counterproductive in this regard.</p>
<p>(b) improving access to and participation in culture and cultural heritage for all, notably for young people, and strengthening social resilience and social cohesion, in particular intergenerational fairness, equality and diversity, through cultural engagement;</p>	<p>PL</p> <p>(Drafting suggestions):</p> <p>improving access to and participation in culture and cultural heritage for all, notably for young people, and strengthening social resilience and social cohesion, in particular intergenerational fairness, equality and diversity, through cultural engagement and cultural education (music schools, youth art schools, and other cultural education institutions contributing significantly to cultural participation)</p> <p>PL</p> <p>(Comments):</p> <p>Cultural education is missing here. Cultural education programmes such as music schools, youth art schools, and other cultural education institutions also contribute significantly to cultural participation. Publicly accessible</p>

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	<p>cultural institutions such as public libraries ensure free access to knowledge, culture, and digital offerings for all citizens. Audience development is crucial for the sector.</p> <p>IT (Drafting suggestions):</p> <p>(b) improving access to and participation in culture and cultural heritage for all, notably for young people and persons with disabilities, raising awareness of common history and values and reinforcing a sense of belonging to a common European space, and strengthening social resilience and social cohesion, in particular intergenerational fairness, equality and diversity, through cultural engagement;</p> <p>b-bis Support the full participation of people with disabilities in cultural life on an equal basis, as a fundamental principle for effective inclusion, making culture an effective right for all.</p> <p>IT (Comments):</p> <p>We welcome the new emphasis to young people and intergenerational fairness and propose to broaden the scope to persons with disabilities. Cultural heritage should be recognised as a key element of Europe’s historical memory and identity. We propose to encourage the sharing and appreciation of Europe's cultural heritage as a shared resource. This is strongly connected with the CERV+ pillar. Reference to the European Heritage Label might be included as well.</p> <p>IE (Comments):</p> <p>Ireland supports work on improving access to culture and cultural heritage more generally, including the increased focus on access for young people under this programme</p>

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	<p>EL (Drafting suggestions): improving access to and participation in culture and cultural heritage for all, notably for young people and vulnerable social groups, and strengthening social resilience and social cohesion, in particular intergenerational fairness, equality and diversity, through cultural engagement;</p> <p>EL (Comments): Participation and access for all is crucial and is realized through various actions, in order to ensure equality in the field of culture.</p> <p>DE (Comments): Cultural education programmes such as music schools, youth art schools, and other cultural education institutions also contribute significantly to cultural participation and promote inclusiveness and social integration. Publicly accessible cultural institutions such as public libraries ensure free access to knowledge, culture, and digital offerings for all citizens.</p> <p>BE (Comments): Both the intrinsic and societal value of culture are important to acknowledge within AgoraEU. However, the proposal appears to place less emphasis on the societal value of culture. Why did the Commission choose to combine participation and social resilience into a single paragraph rather than addressing them in two separate ones? And why is cultural education no longer mentioned?</p> <p>Further clarification is needed on how intergenerational fairness will be addressed within AgoraEU.</p>

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	<p>AT (Comments): We welcome the focus on improving participation in culture as a priority of the Culture Strand. It's more open and inclusive than the previous approach on audience development. Literary translation should be explicitly mentioned.</p> <p>NL (Drafting suggestions): improving access to and participation in culture and cultural heritage for all, along with the European Heritage Label, notably for young people, and strengthening social resilience and social cohesion, in particular intergenerational fairness, equality and diversity, through cultural engagement;</p> <p>NL (Comments): Can we make sure that the European Heritage Label is mentioned here as it is part of the Creative Europe program and focussus specifically on involving young people in cultural heritage.</p> <p>SI (Drafting suggestions): improving access to and participation in culture, arts and cultural heritage</p> <p>SI (Comments): We would like to explicitly include the notion of the arts in this article. We also support FI proposal to add the promotion of arts education and culture-based creativity in education.</p>

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<p>(c) supporting the circulation, distribution, promotion and visibility of diverse European cultural content through various channels across the Union and internationally, including through European platforms for emerging artists, support to entities aiming at training and promoting young artists, prizes that promote artistic talent and excellence, touring initiatives, festivals, and translation;</p>	<p>PL (Drafting suggestions): supporting the circulation, distribution, promotion and visibility of diverse European cultural content through various channels across the Union and internationally, including through European platforms for emerging artists, cultural professionals, support to entities aiming at training and promoting young artists, prizes that promote artistic talent and excellence, touring initiatives, festivals, and translation;</p> <p>PL (Comments): Cultural professionals should also be included.</p> <p>LV (Drafting suggestions): (c) supporting the circulation, distribution, promotion and visibility of diverse and multilingual European cultural and artistic content through various channels across the Union and internationally, including through European platforms for emerging artists, support to entities aiming at training and promoting young artists, prizes that promote artistic talent and excellence, touring initiatives, exhibitions, festivals, and translation;</p> <p>LV (Comments): In addition to cultural content, Latvia would like to highlight the importance of also addressing multilingual and artistic content within this provision.</p> <p>IT (Drafting suggestions): (c) supporting the translation, circulation, distribution, promotion and visibility of diverse European cultural content through various channels</p>

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	<p>across the Union and internationally, including through European platforms for emerging artists, support to entities aiming at training and promoting young artists, prizes that promote artistic talent and excellence in culture and cultural heritage, touring initiatives, festivals, and translation;</p> <p>IT (Comments):</p> <p>The proposal makes only vague reference to European prizes which seem to be linked only to art. Greater visibility should be given to the awards currently included in the cultural strand of the Creative Europe programme which cover a more broad sectoral area (European Heritage Award, European Union Prize for Literature, European Prize for Contemporary Architecture, Talent Awards, EU Prize for Popular and Contemporary Music, EUmies Awards Young Talent for emerging architects).</p> <p>We propose to move translation up, so it relates to all cultural and creative content referred in the para. If translations refer only to literary works this should be specified, leaving it at the end of the sentence.</p> <p>IE (Comments):</p> <p>Ireland welcomes this</p> <p>AT (Drafting suggestions):</p> <p>(c) supporting the <u>transnational</u> circulation, distribution, promotion and visibility of diverse European cultural content through various channels across the Union and internationally, including through European platforms for emerging artists, support to entities aiming at training and promoting young artists, prizes that promote artistic talent and excellence, touring initiatives, festivals, and <u>literary</u> translation;</p>

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	<p>AT (Comments): Will sector-specific initiatives, like Music Moves Europe and Perform Europe, be continued? They are not explicitly mentioned.</p> <p>NL (Drafting suggestions): supporting the circulation, distribution, promotion and visibility of diverse European cultural content through various channels across the Union and internationally, including through European platforms for emerging artists, support to entities aiming at training and promoting young artists and talent development, prizes that promote artistic talent and excellence, touring initiatives, festivals, and translation;</p> <p>NL (Comments): Can talent development also be mentioned here? As in the Media Plus strand, it is connected with strengthening the cultural sector.</p>
<p>(d) strengthening the capacity and skills in the cultural and creative sectors to drive innovation and competitiveness and to navigate the green and digital transitions, including through support for networks of cultural and creative organisations, training and peer-learning activities;</p>	<p>IT (Drafting suggestions): (d) strengthening the capacity and skills in the of cultural and creative sectors professionals to drive innovation and competitiveness, pursuing their core mission, open Europe’s culture to the world and to navigate embrace and lead the green and digital transitions, including through support for networks of cultural and creative organisations, training and peer-learning activities;</p> <p>IT (Comments):</p>

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	<p>Beyond fostering innovation and competitiveness, strengthening the capacity and skills in the cultural and creative sectors is essential to pursue their core mandates.</p> <p>Museums, archives, and other cultural institutions needs to increase their capacity to exploit the opportunities offered by digital technologies to produce and promote culture and better safeguard and promote cultural heritage, ensuring the sustainable management of cultural institutions and heritage sites, engaging citizens and communities and raise their awareness on Europe’s shared values and Europe’s cultural identity, opening new opportunities for collaboration, resource-sharing, cross-border cultural cooperation and visibility, complementing physical initiatives (including trough Europeana and Digital Heritage), and opening to new markets thus contributing to sustainability of the sector.</p> <p>“Navigate the green and digital transition” is insufficient, since these transitions are not only technical challenges, they are cultural ones. Therefore, references to culture as a leader and resource for the green and digital transitions should also be included.</p> <p>Besides the reduction of their impact on the environment, and improvement of their capacity to address climate related threats, culture and heritage operators and institutions they play a vital active role in driving the green transition, envisioning alternative futures, promoting behavioural change, and creating innovative solutions to accelerate the green transition. This is in line with the new European Bauhaus.</p> <p>IE (Drafting suggestions):</p> <p>(d) strengthening the capacity and skills in the cultural- and creative and heritage sectors, to <i>inter alia</i> drive innovation and competitiveness and to navigate the green and digital transitions, including through support for</p>

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	<p>networks of cultural and creative organisations, training and peer-learning activities</p> <p>IE (Comments):</p> <p>Ireland welcomes this though would like to include a reference to heritage skills and also would like a focus on skills for their own sake too and not just to drive the twin transition and competitiveness.</p> <p>Note: The document does not make any references to sustainability in the overall meaning of the Sustainable Development Goals e.g. Goals 4 or 11. The EU supports the UNESCO Mondiacult Declaration which is specifically about the role of culture in sustainability. This could be referenced more clearly</p> <p>DE (Drafting suggestions):</p> <p>(d) nurturing talent as well as developing and strengthening the capacity and skills in the cultural and creative sectors to drive innovation and competitiveness and to navigate the green and digital transitions, including through support for networks of cultural and creative organisations, training and peer-learning activities;</p> <p>DE (Comments):</p> <p>We recommend to align the wording with the previous Creative Europe Regulation, which highlights that cultural funding is also justified based on the intrinsic value of art and culture.</p> <p>General cultural education should also be highlighted here (basic cultural education/cultural institutions in the city and cultural services for the general public).</p> <p>AT</p>

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	<p>(Drafting suggestions):</p> <p>(d) strengthening the capacity and skills in the cultural and creative sectors to drive <u>societal well-being</u>, innovation and competitiveness and to navigate the green and digital transitions, including through support for networks of cultural and creative organisations, training and peer-learning activities;</p> <p>AT</p> <p>(Comments):</p> <p>Add the social dimension as reference to capacity building on topics such as inclusion, health and wellbeing, arts education etc.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>strengthening the capacity and skills in the cultural and creative sectors to drive innovation and competitiveness and to navigate the green and digital transitions, including through support for networks of cultural and creative organisations, training and peer-learning activities; supporting the digital transformation of the cultural and creative industries, innovative practices, new production, distribution and business models, facilitating access to finance and encouraging cross-border activities of creative professionals.</p> <p>NL</p> <p>(Comments):</p> <p>Digital transformation is an important development within the CCS, as it is in the audiovisual and media sectors and mentioned in the Media Plus strand.</p>
<p>(e) promoting cultural policy development through cooperation and exchange of good practices at Union level, and improving evidence base through enhanced data collection, analysis, and pilot actions;</p>	<p>PL</p> <p>(Comments):</p>

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	<p>What exactly is meant by “enhanced data collection”? We suggest to avoid unclear expressions.</p> <p>IT (Comments):</p> <p>We welcome the increased attention to promoting data, analysis, and pilot projects to support evidence-based policy development.</p> <p>IE (Comments):</p> <p>The text on cooperation and exchange of good practice could usefully link to the Erasmus+ Programme.</p> <p>DE (Comments):</p> <p>What exactly is meant by “enhanced data collection”? Additional (administrative) burdens for Member States must be avoided. The current Creative Europe Regulation (Regulation 2021/818) explicitly advocates the use of existing data sources (Article 12, e.g., UNESCO data) and a realistic and implementable indicator system (paragraph 47).</p> <p>BE (Comments):</p> <p>Further clarification is needed regarding ‘enhanced data collection’. How will it be ensured that this does not lead to increased administrative burden for beneficiaries and / or Member States?</p> <p>AT (Drafting suggestions):</p> <p>(e) promoting cultural policy development through <u>European</u> cooperation and exchange of good practices at Union level, and improving evidence base through enhanced data collection, analysis, and pilot actions;</p>

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	<p>HU (Comments):</p> <p>We do not consider it justified to dedicate a separate focus area to listing procedures or working methods such as peer learning, exchange of good practices, data collection, analyses, or pilot actions. These are well-established and widely known methods, but they are not specific objectives of the Culture Strand.</p> <p>Instead, it might be more appropriate to reinstate the reference to arts education and culture-based creativity in education — as included in the current Creative Europe programme regulation, Article 5(e): “to strengthen European identity and values through cultural awareness, arts education and culture-based creativity in education.</p> <p>SK (Comments):</p> <p>We fully agree with the text, especially as regards supporting the development of cultural policy through cooperation and exchange of good practices at Union level, as well as improving the knowledge base. However, we would like to strongly appeal for the need to create a consistent and systematic data collection mechanism, which has been inadequately set up for a long time. Currently, key data are often missing or are available with a significant time delay, which limits their practical use for the creation of cultural policies or strategic decision-making at both national and European level. We therefore consider it essential that the Programme places greater emphasis on a quality system of data collection, processing and timely publication.</p>
<p>(f) advancing the Union’s international cultural relations and contributing to the Union’s external action objectives through cultural cooperation;</p>	<p>IT (Comments):</p> <p>We strongly support this reference. Culture is a fundamental resource for promoting the European Union's international relations. Our neighboring</p>

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	<p>countries, particularly those ones in the Mediterranean, are realizing that culture can be, for them as it is for us, an extraordinary tool for sustainable development and job creation. The cultural dimension must also be a central component of the Union's external action in the next budget cycle, particularly in relations with the Mediterranean and Middle Eastern countries.</p> <p>IE (Comments): While Ireland supports this objectives, it is important that funding of new work in this area does not negatively impact the availability of funding for actions in core Creative Europe areas under 4a-4d above, notably funding for co-creation, transnational collaboration, mobility and distribution of artistic works.</p> <p>SI (Comments): We strongly support this reference.</p>
<p>(g) supporting the implementation of the Decisions No 445/2014/EU²⁷ and No 1194/2011/EU²⁸ of the European Parliament and the Council of the Union.</p> <hr/> <p>27 Decision No 445/2014/EU of the European Parliament and of the Council of 16 April 2014 establishing a Union action for the European Capitals of Culture for the years 2020 to 2033 and repealing Decision No 1622/2006/EC (OJ L 132, 3.5.2014, p. 1, ELI: http://data.europa.eu/eli/dec/2014/445(1)/oj).</p> <p>28 Decision No 1194/2011/EU of the European Parliament and of the Council of 16 November 2011 establishing a European Union action for the European Heritage Label (OJ L 303, 22.11.2011, p. 1, ELI: http://data.europa.eu/eli/dec/2011/1194/oj).</p>	<p>IE (Comments): The reference to ECOC and EHL could be made more explicit here</p> <p>AT (Drafting suggestions): (g) supporting the implementation of the European Capitals of Culture and the European Heritage Label (Decisions No 445/2014/EU27 and No 1194/2011/EU28 of the European Parliament and the Council of the Union).</p> <p>AT (Comments): We prefer an explicit mention of ECOC and EHL in the text of the article.</p>

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	<p>HU (Comments):</p> <p>We would also like clarification as to why the support for the European Capitals of Culture (ECoC) and the European Heritage Label (EHL) is explicitly listed among the objectives. In the previous regulation, this support was only included under <i>actions</i> — together with EU cultural prizes, the European Heritage Days, and others.</p> <p>In this form, we consider a more substantial justification necessary and would therefore suggest considering a concept whereby a permanent, predictable (co-)financing mechanism would be introduced in the programme to ensure the long-term sustainability of results achieved by the title-holders during their year of designation.</p> <p>SK (Comments):</p> <p>Other prizes, such as the European Union Prize for Literature, should be considered. However, if it is covered by “prizes that promote artistic talent and excellence” in the above letter c), a corresponding reference should be made in the recitals. There is a reference to literature and book publishing in recital 7 as part of the cultural and creative sectors and prizes also promote their excellence and increase their visibility.</p>
<p>The implementation of the ‘Culture’ specific objective shall be carried out with full respect of artistic freedom and diversity of cultural expressions, and contribute to the improvement of working conditions for artists and cultural and creative professionals.</p>	<p>PL (Drafting suggestions):</p> <p>The implementation of the ‘Culture’ specific objective shall be carried out with full respect of artistic freedom and diversity of cultural expressions, and contribute to the improvement of working conditions for artists and cultural and creative professionals. It is necessary to provide legislative and systemic solutions that will ensure a more stable social and labor status for artists and cultural and creative professionals.</p>

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	<p>PL (Comments): It is not enough to just talk in general about improving working conditions – it is also necessary to support legislative and systemic solutions that will ensure a more stable social and labor status for artists and cultural and creative professionals. This includes not only fair remuneration, but also access to social and health care, opportunities for further education and mental support.</p> <p>It should also provide mechanisms enabling fair distribution of funds in EU countries.</p> <p>IT (Comments): We welcome the increased attention to safeguarding artistic freedom.</p> <p>IE (Comments): Ireland welcomes this focus.</p> <p>AT (Comments): We very much welcome the reference on the improvement of the working conditions, especially a focus on fair pay would be an important new feature of the EU programme. What measures are planned?</p> <p>SI (Drafting suggestions): The implementation of the ‘Culture’ specific objective shall be carried out with full respect of artistic freedom and diversity of cultural and linguistic</p>

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	expressions, and contribute to the improvement of working conditions for artists and cultural and creative professionals. SI (Comments): We would like to explicitly include the notion of the linguistic expressions in this article.
Chapter III	

<p>MEDIA+ strand</p>	<p>LV (Comments): We note that “MEDIA” is a well-established and internationally recognized brand within the audiovisual sector. Latvia would prefer not to lose this identity. We believe that these two areas — audiovisual and news — should be addressed in separate chapters, given their distinct objectives and target audiences.</p> <p>Latvia welcomes the significant increase in the budget. However, we would like to see a clear delineation of funding within this section, reflecting the differing goals, needs, and final beneficiaries in the audiovisual sector and the news media domain.</p> <p>IE (Comments): Ireland reiterates that it will be important to structurally separate the AV/Film and News strands within Media+ and ensure ringfenced funding for each area.</p> <p>BE (Comments): cfr general BE remarks, we emphasize the need to respect the balance between the different strands and substrands of the programme, as well as continuity and specific nature of the various sectors and strands concerned.</p> <p>AT (Comments): Need for balance between “Audiovisual” and “News”!</p> <p>HU (Drafting suggestions): MEDIA+ strand <u>Audiovisual and media</u></p> <p>HU</p>
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	<p>(Comments):</p> <p>We consider that the acronym MEDIA+ of Chapter III is misleading. We propose to rename Chapter III as “Audiovisual and Media”, and Article 6 as “Media”.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>Creative Europe - MEDIA+ strand</p> <p>SI</p> <p>(Comments):</p> <p>General remarks:</p> <p>To ensure impact, the programme should safeguard that the specific values and mission of the strand are not diluted or overshadowed by the more horizontal objectives of the CERV strand, especially, since the set of introductory statements relating to audio-visual content and media is overly general. In its current form, it does not provide sufficient guidance or assurances for substantive support to sectors that take into account the specific nature of markets and EU-level regulations.</p> <p>We propose adding the annexes containing the description of the programme actions of the strand, as well as the common qualitative and quantitative impact programme indicators, as set out in the current regulation: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0818.</p> <p>We also advocate adding committee procedures to the normative text. The Committee may meet in specific configurations to address concrete issues relating to the individual strands of the Programme.</p> <p>Additionally, we propose to specify the contact points more clearly in the normative text.</p>

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	<p>Remark on the proposed change of the title: We would like to preserve the symbolic link, given that the MEDIA strand has been a prominent part of the Creative Europe programme for many years. In our opinion, the expansion of the strand's scope cannot justify breaking its historical link to a successful EU brand.</p>
<p><i>Article 5</i></p>	<p>DE (Comments): General remark: Article 5, without an annex, contains fewer guidelines. Combined with the proposed deletion of governance provisions, this would not only complicate the assessment of the proposed new programme, but also its ongoing management by the Member States during the program's duration. The same would apply to Articles 4 and 6.</p> <p>The goal must be to preserve the strengths of the existing MEDIA programme while sensibly integrating the new news area in a way that satisfies both objectives. This requires clear structures that respect the specificities and needs of each sector.</p> <p>AT (Comments): The proposed article on “Audiovisual” seems less concrete than the article on “News”. Without the corresponding annex the comparison between the current and new Programme is not possible. We are concerned that some actions might get lost. We kindly ask the COM for a working document in order to be able to consult national stakeholders who need predictability on EU funding possibilities.</p>

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<p style="text-align: center;"><i>Audiovisual</i></p>	<p>IT (Comments):</p> <p>The competitiveness of the European film/audiovisual industry is strategic for Europe's image in the world and for the protection of its cultural sovereignty . We share and support the strategic objectives of AgoraEU, to contribute to the cultural diversity and competitiveness of the audio visual sector and video game industries, in particular by strengthening the creation and cross-border distribution of European content and citizens' access to it.</p> <p>Removal of the Annex of actions reduces legal certainty for beneficiaries; reinstating a MEDIA+ Annex is essential.</p> <p>With the removal of the annex, wording of the article 5 should be more precise so that the different schemes can be reflected, including keywords actually missing: film, theatrical distribution, trainings, heritage, SME.</p> <p>HR (Comments):</p> <p>Croatia strongly advocates for maintaining formal Member States' involvement in the implementation of the Programme, its annual work programmes, monitoring and evaluation. We consider participative role of each MS vital for effective implementation of the Programme in line with its goals.</p> <p>Detailed Annex for Media + strand should be added to ensure transparency and clarity.</p> <p>Croatia considers explicit mention of independent producers crucial, they play a key role in promotion of cultural diversity and competitiveness of the European AV sector.</p>

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<p>Within the MEDIA+ strand, the ‘Audiovisual’ specific objective shall focus on:</p>	<p>IT (Comments): To defend the competitiveness of our cultural and creative sectors and industries and promote European cultural sovereignty, it is necessary to strengthen policies supporting the film and audiovisual sector. To ensure that the audio-visual sector receives the support it deserves, we put forward some proposals.</p> <p>FR (Comments): The French authorities welcome the emphasis placed on the circulation of works within the European Union and the focus on raising awareness among audiences, particularly young audiences, including through continued support for a European cinema network, as well as the emphasis placed on video games. However, the draft article lacks precision regarding the concrete actions that will be implemented under the programme, notably the absence of any reference to co-productions, the promotion of non-national works, and above all, independent production.</p> <p>SI (Comments): In the implementation of the “Audiovisual” objective, specific attention should be paid to the growth and promotion of independent production.</p>
<p>(a) supporting the creation of European audiovisual works across multiple formats and genres, with the potential to reach diverse audiences across borders;</p>	<p>PL (Drafting suggestions): (a) supporting the creation of European audiovisual works, including films, across multiple formats and genres, with the potential to reach diverse</p>

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	<p>audiences across borders, with particular attention to works produced by European independent production companies;</p> <p>PL (Comments):</p> <p>The proposed change clarifies the scope by explicitly including films within audiovisual works and emphasizes support for European independent production companies, who play a key role in ensuring diversity, creativity, and cultural pluralism in the European audiovisual sector.</p> <p>LV (Drafting suggestions):</p> <p>(a) supporting the creation and development of European audiovisual works by European independent audiovisual companies across multiple formats and genres, with the potential to reach diverse audiences across borders;</p> <p>LV (Comments):</p> <p>We strongly encourage explicitly mentioning independent producers and independent productions in the proposal, as is currently the case in the Creative Europe programme. The principle of independence is a key prerequisite for competitiveness, diversity, and excellence in the European audiovisual sector. It also supports the growth of small and medium-sized enterprises, enabling them to compete with global platforms.</p> <p>IT (Drafting suggestions):</p> <p>(a) supporting the development and creation of European audiovisual works produced by European independent audiovisual companies across multiple formats (such as feature films, short films, series, documentaries, animation, immersive works and narrative video games) and genres, with</p>

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	<p>the potential to strengthen coproductions and reach diverse audiences, including children and young people, across borders;</p> <p>IT (Comments):</p> <p>In the implementation of the “Audiovisual” objective, specific attention should be paid to the growth and promotion of independent production. Therefore, the independence criteria must remain a prerequisite, vital for supporting independent European producers and distributors, fostering diversity of stories, creative risk-taking, and protecting freedom of expression.</p> <p>A new European co-production fund is necessary to support European minority and majority co-productions with European Economic Area countries of films, series, and documentaries for the development of co-production projects, which are strategic for increasing visibility and transnational circulation of European works, including in terms of distribution in non-European markets.</p> <p>IE (Comments):</p> <p>Ireland welcomes this, in particular the reference noting the potential of the sector to reach diverse audiences.</p> <p>HR (Drafting suggestions):</p> <p>supporting the creation of European audiovisual works across multiple formats and genres, with the potential to reach diverse audiences across borders while promoting also the objective of cultural diversity;</p> <p>FR (Drafting suggestions):</p>

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	<p>a) supporting the creation of European audiovisual works, <u>the development and the production of independent European audiovisual works, including support to European works targeting young audiences, the promotion of non-national works, the development of co-productions</u>, across multiple formats and genres, with the potential to reach diverse audiences across borders <u>or to contribute to European cultural diversity</u>;</p> <p>FR (Comments):</p> <p>The French authorities suggest including two references that will also support the development and independent production of European audiovisual works, rather than limiting support to creation alone. Furthermore, the ability to reach diverse audiences across borders should not be the only criterion for selecting works to receive support. Subject to further analysis, it could, for example, be useful to add a criterion relating to the work's contribution to European cultural diversity. They suggest that production support should target works that are likely to appeal to young audiences, particularly those aged 15-25, who are faced with a lack of dedicated proposals. This could take the form, for example, of support for the co-production of works by “first-time screenwriters” that would be their second or third works.</p> <p>DE (Drafting suggestions):</p> <p>(a) supporting the creation of European audiovisual works including film across multiple formats and genres, with the potential to reach diverse audiences across borders;</p> <p>DE</p>

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	<p>(Comments):</p> <p>The core of the current MEDIA program must be retained – alongside the important new News section in Art. 6:</p> <ul style="list-style-type: none"> - Promoting the cross-border distribution of European works - Strengthening the European internal market for audiovisual content. <p>• MEDIA+ should continue to:</p> <ul style="list-style-type: none"> - Support independent distributors and global sales agencies - Promote theatrical distribution of non-national European films. <p>Despite growing digital offerings, cinema remains central due to its unique cultural function.</p> <ul style="list-style-type: none"> - Ensure the visibility of European works on all platforms. <p>BE</p> <p>(Drafting suggestions):</p> <p><u>supporting the [he development and production] of European audiovisual works across multiple formats and genres, with the potential to reach diverse audiences across borders</u></p> <p>BE</p> <p>(Comments):</p> <p>This article does not mention “the development and production” of EU audiovisual works, but only “creation”. Does the word “creation” include development and distribution?</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>(a) supporting the creation of European audiovisual works <u>by European independent production companies</u> across multiple formats and genres, with <u>a focus on quality content and</u> the potential to reach diverse audiences across borders;</p> <p>AT</p>

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	<p>(Comments):</p> <p>Proposed wording seems not sufficient in comparison to current one: add European independent production companies! The quality of content is not taken into account as well. Definition of diverse audiences (age, language, social background)?</p>
<p>(b) fostering the cross-border circulation, distribution, prominence and visibility of European audiovisual works on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion tools;</p>	<p>PL (Drafting suggestions): (b) fostering the cross-border circulation, distribution, prominence and visibility of European audiovisual works, including films, on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion tools;</p> <p>LV (Drafting suggestions): -(b) fostering the cross-border circulation, distribution, prominence and visibility of European audiovisual works, including heritage works, on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion tools;</p> <p>IT (Drafting suggestions): (b) fostering the cross-border circulation, online and theatrical distribution, prominence and visibility of European films and audiovisual works, including heritage works, on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion and discoverability tools;</p> <p>IT</p>

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	<p>(Comments):</p> <p>MEDIA should not aim at ensuring <u>cross border</u> access - which is a terminology related to geoblocking but rather ensure wide circulation and promotion of European works in theaters or online in the different EU countries.</p> <p>Support to foster international distribution should be reinforced, strengthening the measures already provided for in the Creative Europe Media Sub-Program and reinforcing of European and non-European distribution of cinematographic and audiovisual works with support for national film exporters (sales agents) and distributors who acquire, edit, and promote high-quality European films in MS. The intervention guarantees plurality of supply and increases interest, accessibility, and visibility among the European public.</p> <p>We consider important to maintain the possibility for the programme to support film heritage and the circulation and promotion of classic cinema.</p> <p>IE</p> <p>(Comments):</p> <p>Ireland welcomes this objective</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>(b) fostering the cross-border circulation, distribution, prominence and visibility of European non-national audiovisual works, including heritage works, on all mediums across the Union and internationally, both online and in movie theaters, including through coordinated distribution strategies, marketing and promotion tools ;</p> <p>FR</p>

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	<p>(Comments):</p> <p>Support aimed at increasing the cross-border circulation, distribution, awareness, and visibility of works should include heritage works and should also mention that non-national works circulation is the priority at European level. Moreover, it is important to keep an explicit focus on theatrical release.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(b) fostering the cross-border circulation, distribution, prominence and visibility of European audiovisual works, including films on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion and discoverability tools and strategies;</p> <p>DE</p> <p>(Comments):</p> <p>Film has been at the core of the MEDIA strand since the beginning and should continue to have a prominent role. Although it is part of the audiovisual industry, we suggest to emphasize its importance in explicitly mentioning the film sector alongside of the audiovisual works. The support of prominence and discoverability is a task deriving directly from the AVMS-Directive and should also cover films and av works.</p> <p>BE</p> <p>(Comments):</p> <p>Could COM explain why the cinemas as mean of distribution are not mentioned anymore?</p> <p>AT</p> <p>(Drafting suggestions):</p>

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	<p>(b) fostering the cross-border circulation, distribution <u>in theatres, on TV and online</u>, prominence and visibility of European audiovisual works, <u>targeting both small and large-sized productions</u> on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion tools;</p> <p>AT (Comments): Add explicit support to small productions and distribution in theatres (cinemas), on TV and online.</p> <p>HU (Drafting suggestions): fostering the cross-border circulation and distribution, prominence and visibility of European audiovisual works on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion tools, <u>including the digital shift</u>;</p> <p>HU (Comments): Justification: prominence regimes are sole Member State competence. We suggest shifting the objective and priority of new digital environment from Creative Europe Programme to Audiovisual sub-strand of AgoraEU.</p>
<p>(c) building audiences for European audiovisual works, including through a network of European cinemas, festivals and outreach campaigns, and addressing in particular young Europeans and underserved communities;</p>	<p>IT (Drafting suggestions): (c) building audiences for European audiovisual works, including through a strongest network of European cinemas, heritage works, film education,</p>

Commission proposal	Drafting suggestions and Comments
	<p>festivals and outreach campaigns, and addressing in particular young Europeans and underserved communities;</p> <p>IT (Comments):</p> <p>We emphasize the importance of building audiences in the audiovisual sector.</p> <p>Support for movie theaters is essential. The programme should increase resources for theaters that screen European films, as already provided for in the Creative Europe Sub-Program (Europa Cinemas network).</p> <p>We would greatly appreciate a specific reference to both the need for a stronger network of cinemas and film education initiatives: these are strategic assets in order to raise awareness among young people about film literacy and promote watching movies in cinemas.</p> <p>To build new audiences there is a need to upgrade the current infrastructure. A new fund should be established for infrastructure investments and functional and technological modernization of active screens, with particular attention to the needs of people with disabilities and inland and disadvantaged areas.</p> <p>IE (Comments):</p> <p>The inclusion of tangible strategies to sustain and build audiences via festivals, campaigns and the European cinema network is welcomed. The expansion of the focus of reach to include underserved communities is appreciated.</p> <p>FR (Drafting suggestions):</p>

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	<p>(c) building audiences for European audiovisual works, including through a network of European cinemas, festivals and outreach campaigns, and addressing in particular young Europeans and underserved communities areas;</p> <p>FR (Comments): The term “underserved communities” lacks precision, as the concept of “community” is not defined. It would seem preferable to refer to underserved areas or populations facing a lack of supply and/or difficulty in accessing services.</p> <p>DE (Drafting suggestions): (c) building audiences for European audiovisual works, including films through a network of European cinemas, festivals, and outreach campaigns, and addressing in particular young Europeans and underserved communities;</p> <p>AT (Drafting suggestions): (c) building audiences for European audiovisual works, including <u>heritage works</u>, through a network of European cinemas, festivals and outreach campaigns, and addressing <u>audiences of all ages</u>, in particular young Europeans and underserved communities;</p> <p>AT (Comments): We welcome the mentioning of cinemas and festivals in this clear form. But they are relevant for all age-groups, not only for young people. Cinemas and festivals play a central role (backbone) in showing historical European films and keeping European film culture heritage visible.</p>

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<p>(d) supporting the development and prototyping of European video games and immersive content, including through market testing, promotion and discoverability audience-driven strategies, and distribution across all platforms;</p>	<p>RO (Drafting suggestions): We warmly welcome recognition of support for the development and prototyping of European video games and immersive content. We support extending point (d) to: “(d) supporting the development and creation of prototypes of European video games and immersive content, including functional prototypes as a high-risk but highly innovative phase, as well as market testing, promotion and discoverability strategies...”.</p> <p>IT (Comments): We would like clarification on what kind of support it is planned for the video games sector. We support other delegations pointing out the need to avoid supporting only one or two large developers and duplicating initiatives at EU level, The videogames industry should be also financially supported by the Competitiveness Fund.</p> <p>IE (Comments): Ireland welcomes the inclusion of video games and immersive content as acknowledged as part of the creative and cultural industries. Financial supports for the sector will aid competitiveness in a global market and encourage cross-border cooperation.</p> <p>AT (Comments): Definition of European video games (independent producers)?</p>

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	<p>What platforms for video games, besides digital platforms, are meant (e.g. fairs, what else)?</p> <p>NL (Drafting suggestions):</p> <p>d) supporting the development and prototyping of the European digital culture industries, including video games and immersive content (XR), including through market testing, promotion and discoverability audience-driven strategies, and distribution across all platforms;</p> <p>NL (Comments):</p> <p>The new and quickly developing field of digital culture is much broader than just video games. It encompasses virtual reality, augmented reality, and immersive experiences, all under the umbrella term XR.</p> <p>NL points out that the current focus on digital culture, games, and immersive media is still mainly on digital/cross-platforms, while there are also major challenges in physical distribution and screening venues, challenges that should also be within the scope and responsibility of the AgoraEU program.</p> <p>SI (Comments):</p> <p>With regard to support for video games, we would like clarification from the Commission as to what kind of support it is planning in this area. We would like to avoid supporting only one or two large developers and duplicating initiatives at EU level, while pointing out that this is a large industry that should be financed also from the Competitiveness Fund.</p>
(e) enhancing talent development, supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and	RO

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<p>business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;</p>	<p>(Drafting suggestions):</p> <p>We also support expanding point (e) to strengthen talent development, lifelong training, mobility, business innovation and networking structures for audiovisual professionals: “(e) improving talent development, including through continuous professional training and mobility, supporting access to finance, business exchanges, networking, and innovative business models...”.</p> <p>PL (Drafting suggestions):</p> <p>e) enhancing talent development, supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts, while ensuring that independent producers retain adequate rights ownership and control over the exploitation of their works;</p> <p>PL (Comments):</p> <p>The amendment underscores the importance of safeguarding the rights and autonomy of independent producers, ensuring they maintain fair ownership and control over their works, which is essential for fostering a sustainable and competitive European audiovisual ecosystem.</p> <p>LV (Drafting suggestions):</p> <p>e) enhancing talent development, nurturing competences and skills, supporting training, networking, cross-border cooperation and mobility of audiovisual professionals, as well as activities of European audiovisual</p>

Commission proposal	Drafting suggestions and Comments
	<p>operators at industry events; supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;</p> <p>LV (Comments):</p> <p>Latvia proposes to divide the current subpoint (e) into two distinct parts to improve clarity and coherence. In our opinion, the original points combine too many and diverse goals, that serve different needs and stakeholders. Dividing this point would ensure clearer thematic focus.</p> <p>IT (Drafting suggestions):</p> <p>(e) enhancing talent development, nurturing competence and skills, training networking, cross border cooperation and mobility of audiovisual professionals, as well as activities of European audiovisual operators at industry events</p> <p>(e bis) supporting facilitating access to finance with particular attention to SMEs, business-to-business exchanges and networking, adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;</p> <p>IT (Comments):</p> <p>We suggest to divide the current subpoint (e) into two distinct parts to improve clarity and coherence. In our opinion, the original points combines too many and diverse goals, that serve different needs and stakeholders.</p>

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	<p>Dividing this point would ensure clearer thematic focus and give more focus on access to finance particularly for SMEs</p> <p>IE (Comments):</p> <p>While Ireland welcomes this, and notes that networking and business-to-business initiatives are an essential part of the programme and of the industry and have a direct impact on the growth of the sectors; given budget constraints funding should be prioritised for content creation, collaboration and distribution actions (per 5a-5d above) with more limited funding for networking and business-to-business initiatives.</p> <p>FR (Drafting suggestions):</p> <p>(e) enhancing talent development, supporting access to finance, business-to-business exchanges and networking, <u>notably via support to markets organisation and to training,</u> adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, <u>encompassing appropriate retaining of intellectual property rights in Europe,</u> particularly in response to creative, market and technological shifts;</p> <p>FR (Comments):</p> <p>The French authorities consider that explicit mention of supporting markets and training for professionals is necessary. Furthermore, as there has been numerous reports explaining how business models are shifting towards a diminishing of intellectual property rights in Europe, this should be a priority for the future of the audiovisual & video games industry.</p> <p>BE (Drafting suggestions):</p>

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	<p><u>enhancing talent development [and skills development], supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts:</u></p> <p>BE (Comments): Add “skills”: Cfr. Current programme “enhancing talent and skills development”</p> <p>AT (Drafting suggestions): (e) enhancing talent <u>and skills</u> development, supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;</p> <p>AT (Comments): There seems to be a strong economic focus. The current scheme on talent and skills development has a much broader scope of topics. What is meant by “supporting access to finance” (InvestEU)?</p> <p>HU (Drafting suggestions): e) enhancing talent development, supporting access to finance, business-to-business exchanges and networking, adoption development of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;</p>

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	<p><u>new subsection after point e): promotion of media literacy</u> HU (Comments): Justification: adoption is not the strategy of leading industries.</p> <p>We strongly support promoting media literacy activities, although it only appears in News strand. We suggest making note of it in Audiovisual sub-strand as well.</p>
	<p>LV (Drafting suggestions): <u>(new subpoint)</u> <u>facilitating supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;</u></p>
<p>(f) fostering policy dialogue, exchange of best practices, data collection and analysis, including the payment of the contribution fee for Union membership of the European Audiovisual Observatory;</p>	
<p>(g) contributing to the implementation of Directive 2010/13/EU of the European Parliament and of the Council.²⁹</p> <p><small>²⁹ Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or</small></p>	<p>HU (Comments): It is not clear why the <i>exchange of best practices</i> appears among the objectives, since their collection and dissemination are already carried out</p>

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<p>administrative action in Member States concerning the provision of audiovisual media services (OJ L 95, 15.4.2010, p. 1, ELI: http://data.europa.eu/eli/dir/2010/13/oj).</p>	<p>and explicitly included in the cultural work plans. However, the idea of collecting or exchanging best practices could prove valuable if the existing good practices in the various cultural sub-sectors were made accessible through a unified searchable platform, the funding of which would be ensured under the AgoraEU programme’s Creative Europe strand. At present, the good practices identified mainly through OMC reports represent only a fraction of what actually exists in the field, and they are difficult to search.</p>
	<p>RO (Drafting suggestions):</p> <p>We propose ensuring complementarity between AgoraEU and national support mechanisms to avoid overlap and to guarantee fair access to funding for Member States with small audiovisual markets, including through regional coproductions and partnerships. A new letter could read: “(h) ensuring complementarity with national support mechanisms and facilitating equitable access to funding for Member States with small audiovisual markets, including through supporting coproductions and regional partnerships.”</p>
<p>The implementation of the ‘Audiovisual’ specific objective shall be carried out with full respect for artistic freedom and ensuring collaboration among entities from Member States with different audiovisual capacities.</p>	<p>PL (Drafting suggestions):</p> <p>(...)Implementation should also include constant monitoring of MEDIA+'s impact. It should also contribute to improving the working conditions of artists and people professionally involved in the audiovisual sector.</p> <p>PL (Comments):</p>

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	<p>It would be advisable for the programme to include systematic reporting on the support provided to the audiovisual sector in individual Member States. We suggest adding : <i>Implementation should also include constant monitoring of MEDIA+'s impact. It should also contribute to improving the working conditions of artists and people professionally involved in the audiovisual sector.</i></p> <p>LV (Comments):</p> <p>Latvia strongly supports maintaining the principle of the level playing field and enhanced cooperation among the MS with different audiovisual capacities in the AgoraEU programme. This principle is essential to ensure balanced participation across Europe and to reduce structural inequalities in the audiovisual sectors and to foster cooperation across borders.</p> <p>NL (Drafting suggestions):</p> <p>The implementation of the 'Audiovisual' specific objective shall be carried out with full respect for artistic freedom and ensuring collaboration among entities from Member States with different audiovisual capacities. The implementation of the 'Audiovisual' specific objective will have a transparent, earmarked budget within the Media Plus strand.</p> <p>NL (Comments):</p> <p>The Netherlands highly appreciate the emphasis of artistic and editorial freedom.</p> <p>The Netherlands also insist on transparent, earmarked budgets for audiovisual and media related projects, knowing that the implicated sectors are deeply different and will need fundamentally different approaches.</p>
	<p>LV</p>

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	<p>(Drafting suggestions):</p> <p>Chapter IV</p> <p><u>NEWS+ strand</u></p>
<p><i>Article 6</i></p>	

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<p><i>News</i></p>	<p>LV (Comments): Latvia highly values the planned targeted support for the development of a resilient, diverse, and high-quality media ecosystem. This includes promoting media literacy, ensuring journalist safety, and combating disinformation — all of which are particularly relevant priorities in today’s context and require stable, targeted and predictable EU support.</p> <p>IE (Comments): Ireland welcomes the new specific objective on News Media. It will be important that measures under this objective include supports for independent, small, local, and regional news organisations that are vital accurate information sources for communities.</p> <p>BE (Comments): Can the COM provide us with a list of actions that are currently funded by other programs and will be integrated into the NEWS sub-program in the future? Examples: what about EDMO, Europeana, etc.?</p> <p>AT (Comments): AT welcomes the enhancement of EU funding for the news media sector. We kindly ask the COM to provide a working document outlining which support measures have been implemented up to date and which are planned for the future. Is the new “Media Resilience Programme” within the Democracy Shield a pilot action before AgoraEU enters into force?</p> <p>HU (Drafting suggestions): News-Media</p>
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	<p>HU (Comments): We propose to rename Article 6 as “Media”.</p>
<p>Within the MEDIA+ strand, the ‘News’ specific objective shall focus on:</p>	<p>LV (Drafting suggestions): Within the MEDIA+ strand, The ‘News’ strand specific objective shall focus on:</p> <p>LV (Comments): Latvia would like to see dedicated chapter within AgoraEU specifically focused on support for news and journalism – this would ensure greater strategic visibility, enable clear earmarking of budgetary resources and avoid any overlaps.</p> <p>IT (Comments): We appreciate that a specific strand of the proposed regulation provides a path to address the challenges facing the news sector. From our standpoint the core of this action must be supporting and fostering the viability of the news media in the current, challenging information ecosystem, where the business model of the very large online platforms and search engines as well as the providers of generative AI systems is jeopardising their very existence.</p> <p>IE (Comments): As a general comment, Ireland notes the use of “enhance”, “support” and “promote” in different parts of Article 6. Noting issues raised by other Member States, in particular HR, in terms of the varied strength of these</p>

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	<p>terms, IE suggests consideration of the use of more consistent language throughout.</p> <p>IE welcomes the clarification provided at CAC in relation to how funding is to be administered (through schemes similar to those currently available under Creative Europe).</p> <p>As mentioned by many other Member States, including HR, NL and RO, IE also reiterates previous comments about the importance of ring-fenced funding between specific strands and objectives. In addition, similar to AT comment, IE would welcome further information regarding the relationship and differences between the Media Resilience Programme and this objective.</p> <p>DE (Comments):</p> <p>We welcome the fact that Article 6 of the COM proposal places a new emphasis on news media and journalism.</p> <p>It is very important to us that through AgoraEU it is possible to support European platform projects that aim to create and disseminate cultural offerings and news that convey common European values and thus contribute to strengthening Europe's strategic autonomy. It is necessary to offer European citizens a credible alternative to the audiovisual offerings of non-European players.</p> <p>Furthermore, Europe-wide media cooperations targeting non-European audiences, through increased cooperation between European foreign broadcasters, should also eligible for funding through AgoraEU.</p> <p>These comments also apply to Art. 10 of this AgoraEU proposal.</p>
<p>(a) protecting news media outlets and journalists, especially where they face threats, monitoring, assessing and addressing risks to media freedom and</p>	<p>IT</p>

Commission proposal	Drafting suggestions and Comments
<p>pluralism in the internal market and promoting journalistic and editorial standards;</p>	<p>(Drafting suggestions):</p> <p>(a) promoting journalistic and editorial standards; enhancing the role of protecting news media outlets and protecting journalists, especially where they face threats, monitoring, assessing and addressing risks to media freedom and pluralism in the internal market and promoting journalistic and editorial standards;</p> <p>IT</p> <p>(Comments):</p> <p>Comment on the drafting proposal: Our proposal explicitly emphasizes and reaffirms the central value of "promoting journalistic and editorial standards." Regarding protection, we believe it is more appropriate to apply it only to natural persons and, therefore, to journalists, while for the media, strengthening their role, linked to the promotion of the aforementioned standards, is central. We have maintained the monitoring of pluralism, but for us, this comes after all other objectives.</p> <p>General comment: We believe that protecting news media outlets and journalists — particularly when they are under threat — is essential for a democratic society. The current volatile international landscape, shaped by conflicts and profound economic uncertainties, creates precarious working conditions for journalists and poses a serious threat to media freedom and pluralism. Therefore, we welcome the relevant lines of action for these priorities. Promoting high journalistic and editorial standards is also vital for building public trust and improving the quality of information provided.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(a) protecting news media outlets and journalists that are subject to regulatory or recognised self-regulatory standards, especially where they face threats, monitoring, assessing and addressing risks to media freedom and</p>

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	<p>pluralism in the internal market and promoting journalistic and editorial standards</p> <p>IE (Comments):</p> <p>While the generality of the terms ‘news outlet’ and ‘news organisations’, under Article 6(a) and 6(c), respectively, are useful in terms of flexibility of funding, IE suggest funding support be available only to those outlets or organisations that are subject to regulatory or recognised self-regulatory standards – IE note that, at CAC, CION advised that this is intended as a pre-condition to funding. This is important to include to ensure that people can have confidence that the content is meeting a specified criteria or standard. This change would also better reflect Article 18 of EMFA. In addition, Ireland’s regulatory authority has found this criteria as a very useful means of identifying those services that merit funding as part of relevant national media funding schemes.</p> <p>AT (Comments):</p> <p>Will national projects be eligible for funding as well or only projects involving companies from at least three Member States?</p> <p>HU (Drafting suggestions):</p> <p>a) protecting news media outlets and journalists, especially where they face threats, monitoring and assessing risks to media freedom and pluralism in the internal market and promoting journalistic and editorial standards;</p> <p>HU (Comments):</p> <p>Justification: processes related to politics should not be regulated on an internal market basis.</p>

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<p>(b) enhancing the production, distribution and consumption of professional journalistic content, including coverage of Union affairs, investigative journalism, local news, and public interest media;</p>	<p>RO (Drafting suggestions): We strongly support Article 6(b) on strengthening the production, distribution and consumption of professional journalism, from EU affairs reporting to investigative journalism, local news and public-interest media. We propose including distinct funding lines to protect local, regional and independent media from being disadvantaged compared with large media groups.</p> <p>IT (Drafting suggestions): (b) enhancing the production, distribution and consumption of professional journalistic content, including coverage of Union affairs and policies in the international context, investigative journalism, local and community news, and public interest media;</p> <p>IT (Comments): Comment on the drafting proposal: we have added a specific reference to coverage of EU policies and their impact on the international context. Indeed, we believe that any information offering that aims to support democratic debate today cannot ignore the interpretation of European policies in the international context and the analysis of their impact. In addition to local news coverage, we propose including a specific reference to "community news," understood as information relating to and benefiting local communities. This, too, seems to us to be an essential (and increasingly rare) narrative in the current information ecosystem.</p>

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	<p>General comment: Enhancing the production of professional journalistic content is fundamental to support the economic viability and financial independence of news outlets. We appreciate also the reference to distribution and consumption. The real physical retail points where news is sold need to be safeguarded. Indeed, in Italy these kiosks are being crushed by falling newspapers sales. As far as consumption is concerned, nurturing an educated and appreciative news-consuming public is fundamental to increasing the public's willingness to pay for and engage with quality information.</p> <p>IE (Drafting suggestions):</p> <p>(b) enhancing the production, distribution, archiving and consumption of professional journalistic content, including coverage of Union affairs, investigative journalism, local news, and public interest media</p> <p>IE (Comments):</p> <p>We suggest that <u>archiving</u> be added as an activity to be enhanced by the programme. While digital storage has reduced the cost of archiving, it remains important that media organisations archive their content in an accessible and available format, clearly indicating where any changes have been made. Appropriate archiving may be particularly important in the context of certain types of disinformation which seek to distort the events of the recent past.</p> <p>BE (Drafting suggestions):</p> <p><u>enhancing the production, distribution, [prominence] and consumption of professional journalistic content, including coverage of Union affairs, investigative journalism, local news, and public interest media.</u></p>

Commission proposal	Drafting suggestions and Comments
	<p>BE (Comments): Add “prominence”. Prominence is also an important part of the AVMSD</p> <p>NL (Drafting suggestions): (b) enhancing the preconditions for the production, distribution and consumption of professional journalistic content, including coverage of Union affairs, including investigative journalism, local news, and public interest media;</p> <p>NL (Comments): This should only result in projects carried out by the media sector. There is no power for the Commission to make policies or regulations in this field. The Commission (or its agencies) should not support the production of individual content. It could, however, create the right preconditions or ecosystem in which journalistic content can be made or can thrive. “the coverage of union affairs” could put pressure on media organisations to give a positive review of Union affairs. This should be avoided.</p> <p>SK (Drafting suggestions): enhancing the production, distribution and consumption of professional journalistic content, including coverage of Union affairs, investigative journalism, local news, community media, and <u>public interest media</u>;</p> <p>SK (Comments):</p>

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	<p>We suggest adding “community media” that are not territory-based media. They serve specific interests of various communities such as visually impaired individuals, pensioners, students, certain minorities, etc. and are not profit-driven or financed in a way typical of the sector.</p> <p>There is no definition of “public interest media” in any legal act or parliamentary resolution. It is unclear which media qualify as public interest media. This expression needs to be clarified.</p> <p>SI (Drafting suggestions):</p> <p>enhancing the production, distribution and consumption of professional journalistic and media content, including coverage of Union affairs, investigative journalism, local news, and public interest media</p> <p>SI (Comments):</p> <p>We propose that the content of the point be expanded to include media content and other media workers. At the same time, we would like clarification from the EC regarding reporting on Union matters</p>
<p>(c) supporting the digital transformation of news organisations, innovative practices, new production, distribution and business models, facilitating access to finance and encouraging cross-border activities and the reskilling and upskilling of news media professionals;</p>	<p>RO (Drafting suggestions):</p> <p>We support reinforcing simplified access under Article 6(c), recognising that small newsrooms cannot effectively access EU funding without reduced administrative burden. We propose specifying simplified procedures for small grants, including short forms, minimal reporting and lump sums.</p>

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	<p>IT (Drafting suggestions): (c) supporting the digital transformation of news organisations, innovative practices, new production, distribution and business models, facilitating access to finance, especially for local news media outlets, and encouraging cross-border activities and the reskilling and upskilling of news media professionals;</p> <p>IT (Comments): Comment on the drafting proposal: We want to underline that support for the digital transformation and financial sustainability of newspapers, is particularly urgent for local media, with the consequent risk of information deserts. General comment: IT considers this paragraph a key provision that should be prioritized, as these activities - supporting the economic development of the sector by focusing on the digital transformation of news organizations, innovative practices, and professional development, and above all facilitating access to finance - represent a conditio sine qua non upon which all other supportive actions for a healthy information ecosystem can be effectively integrated and built.</p> <p>IE (Drafting suggestions): (c) Supporting news media organisations that are subject to regulatory or recognised self-regulatory standards the in digital transformation of news organisation, innovative practices, new production, distribution and business models, facilitating access to finance and encouraging cross-border activities and the reskilling and upskilling of news media professionals;</p> <p>HU</p>

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	<p>(Drafting suggestions):</p> <p>supporting encouraging the digital transformation of news organisations, innovative practices, new production, distribution and business models, facilitating access to finance and encouraging cross-border activities and the reskilling and upskilling of news media professionals;</p> <p>HU</p> <p>(Comments):</p> <p>Justification: the change reflects and respects the independence of news organisations</p>
<p>(d) enhancing cooperation and promoting measures aimed at monitoring and safeguarding the online information space, including detecting and combating disinformation and foreign information manipulation and interference, thereby contributing to greater resilience across the Union;</p>	<p>RO</p> <p>(Drafting suggestions):</p> <p>We welcome Article 6(d) and support adding explicit references to professional fact-checking infrastructures, cross-border cooperation, and the impacts of digital platforms and generative AI on news distribution and visibility.</p> <p>LV</p> <p>(Comments):</p> <p>Will the European Digital Media Observatory (EDMO) be eligible for support under this Article? How will EDMO’s activities align with the proposed European Centre for Democratic Resilience? Will this new centre be financed through the AgoraEU initiative?</p> <p>IT</p> <p>(Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>(d) enhancing cooperation and promoting measures aimed at monitoring and safeguarding the online information space, including detecting, analysing the spread, amplification and impact on democratic discourse of and combating disinformation and foreign information manipulation and interference, in order to effectively address such phenomena, thereby contributing to greater resilience across the Union</p> <p>IT (Comments): Comment on the drafting proposal: We suggest that it is not enough to simply "identify" disinformation and foreign manipulation and interference in information; it is crucial to analyze its spread, amplification, and impact on democratic discourse in order to effectively address these phenomena. This is not just a matter of reactive measures, but of developing a sophisticated understanding of how disinformation works, its propagation, and its corrosive effect on democratic discourse.</p> <p>IE (Comments): IE welcomes this objective.</p> <p>BE (Comments): While protection freedom of expression</p> <p>HU (Drafting suggestions): d) enhancing cooperation and promoting measures aimed at monitoring and safeguarding the online information space, including detecting and combating disinformation and foreign information manipulation and interference, with respect to freedom of speech, thereby contributing to greater resilience across the Union;</p>

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	<p>HU (Comments): Justification: freedom of speech is a key EU value.</p> <p>SI (Comments): We support PT proposal to add the full respect for citizens’ freedom of expression, the right to due process, and Member States’ sovereignty at the end of the point.</p>
<p>(e) promoting digital and media literacy activities in order to enable citizens, including young people, to use and develop a critical understanding of the information ecosystem;</p>	<p>RO (Drafting suggestions): We support strengthening media literacy actions under Article 6(e) by linking them to journalistic expertise and ethical standards.</p> <p>LV (Drafting suggestions): (e) promoting digital and media literacy activities in order to enable citizens, including young people, to use and develop a critical understanding of the information ecosystem, <u>especially in areas and communities which are particularly exposed to FIMI and disinformation;</u></p> <p>LV (Comments): As outlined in the European Democracy Shield, the Commission will roll out a package of measures on media literacy. Priority will be placed on supporting Member States that face particular challenges and needs as well as candidate</p>

Commission proposal	Drafting suggestions and Comments
	<p>countries which are particularly exposed to FIMI and disinformation due to their proximity with Russia and Belarus.</p> <p>Latvia believes this must also be reflected in the context of this Regulation – either in this sub-point, recital 13 or in a new recital.</p> <p>IT (Drafting suggestions):</p> <p>(e) promoting digital and media and film literacy activities in order to enable citizens, including children and adolescents young people, to use and develop a critical understanding of the information ecosystem;</p> <p>IT (Comments):</p> <p>Comment on the drafting proposal: We propose a change to the target audience. The initial proposal referred to "citizens, including young people." Our new draft specifically changes this reference to "citizens, including children and adolescents." This highlights a greater awareness of the need for early intervention in media literacy education, with a different approach for different age groups, but recognizing that critical understanding of the information ecosystem must begin in childhood to develop truly resilient citizens for the future. We propose to add “film” since it is important to work on education to image in schools.</p> <p>General comment: As previously mentioned, IT appreciates this approach, as media and film literacy are an invaluable tool for navigating the complexities of the modern information landscape. They are a vital defence against the widespread dissemination of misinformation and the erosion of public trust. Media literacy activities empower individuals to distinguish between factual and manipulated content by fostering critical evaluation skills, thereby building essential resilience against false narratives.</p>

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	<p>Media and film literacy are an invaluable tool for navigating the complexities of the modern information landscape. It is a vital defence against the widespread dissemination of misinformation and the erosion of public trust. Media literacy activities empower individuals to distinguish between factual and manipulated content by fostering critical evaluation skills, thereby building essential resilience against false narratives.</p> <p>IE (Comments): IE welcomes this and supports youth-focused digital and media literacy as a counter to disinformation.</p> <p>BE (Comments): Cfr. general BE remarks: who will have access to funding for these activities? Also youth organisations and those active in non-formal learning? Smaller organisations and players from culture and media?</p> <p>HU (Drafting suggestions): e) promoting digital and media literacy activities learning material in order to enable citizens, including young people, to use and develop a critical understanding of the information ecosystem;</p> <p>HU (Comments): Justification: the way to enhance media literacy is through learning.</p> <p>SI (Drafting suggestions): promoting digital and media literacy activities in order to enable citizens, including young people, to use and develop a critical understanding of the</p>

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	<p>information ecosystem, taking into account the impact of artificial intelligence.</p> <p>SI (Comments):</p> <p>We suggest that media literacy should also address the use of artificial intelligence, as well as the understanding of its role in shaping how media content is received.</p>
<p>(f) reinforcing policy dialogue, data collection and analysis and development of common standards, including by supporting the work of the European Board for Media Services.</p>	<p>IT (Comments):</p> <p>We strongly support paragraph (f) of Article 6, as we firmly believe that robust data collection and analysis are essential for developing effective, evidence-based policies at the national and EU levels that will foster a healthy information ecosystem. Furthermore, we anticipate that the EBMS's work in this area will become increasingly important in the future.</p> <p>IE (Drafting suggestions):</p> <p>(f) reinforcing policy dialogue, data collection and analysis, and dissemination, and development of common standards, including by supporting the work of the European Board for Media Services.</p> <p>IE (Comments):</p> <p>IE suggests that ‘data dissemination’ is added to ‘collection and analysis’ to ensure that the ‘raw data’ that is collected is also disseminated. Without this dissemination, independent analysis can be difficult.</p>
	<p>SI (Drafting suggestions):</p>

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	<p>Add point (g): “promoting re-granting mechanisms and simplified procedures for small-scale projects implemented by local and community organisations</p> <p>SI (Comments):</p> <p>Embeds re-granting permanently; corresponds to Financial Regulation Articles 125 and 180 on simplified cost options.</p>
<p>The implementation of the ‘News’ specific objective shall be carried out with full respect for media editorial independence and professional standards.</p>	<p>PL (Drafting suggestions):</p> <p>(...) Implementation should also include constant monitoring of MEDIA+'s impact. It should also contribute to improving the working conditions of people professionally involved in the information sector.</p> <p>PL (Comments):</p> <p>It would be advisable for the programme to include systematic reporting on the support provided to the news sector in individual Member States. We suggest adding : Implementation should also include constant monitoring of MEDIA+'s impact. It should also contribute to improving the working conditions of people professionally involved in the information sector.</p> <p>NL (Drafting suggestions):</p> <p>The implementation of the ‘News’ specific objective shall be carried out with full respect for media editorial independence and professional standards. Union institutions, including agencies or bodies, shall not, by the implementation of the ‘News’ specific objective, interfere in or try to influence the editorial policies and editorial decisions of media service</p>

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	<p>providers. The implementation of the ‘News’ specific objective will have a transparent, earmarked budget within the Media Plus strand.</p> <p>NL (Comments):</p> <p>This is a rewording of article 4(2) of EMFA, in which Member States are not allowed to interfere in editorial decisions or policies. This is vital if the Commission will enhance the production of news content, as media service providers will be protected by this article. This article could help to hold the Commission (or other EU institutions, agencies and bodies) to account, should possible interferences arise.</p> <p>Another wording for this addition: ‘While implementing the ‘News’ specific objective, the Union institutions, agencies and bodies shall adhere to Regulation (EU) 2024/1083’.</p>
	<p>RO (Drafting suggestions):</p> <p>Finally, we propose adding a new point (g) to establish the legal basis for a European media forum as a permanent consultative structure involving journalists, NGOs, fact-checking organisations and researchers, including funding for transparency, media ownership data and assessments of media capture risks.</p>

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Chapter IV	
CERV+ Strand	<p>IT (Comments): Given their broad and comprehensive nature, as well as their substantial coherence with the previous CERV Programme, we have no observations or proposals for changes to the text</p> <p>IE (Comments): Ireland is committed to ensuring that dedicated funding for the CERV+ objectives continues to be available and sufficient. In the current context it is also important that CERV+ funding continues to empower civil society to protect and promote fundamental rights, equality and non-discrimination (objective (a)) in line with the Commission Strategy to Strengthen the Application of the Charter of Fundamental Rights in the EU.</p> <p>DE (Comments): Unlike in the current CERV programme, the EU Commission's proposal makes no mention of exchanges between citizens of different Member States. These exchanges are currently included in one of the four existing CERV strands ('Citizens' engagement and participation'). In practice, this aspect is implemented through municipal partnerships (town twinning), municipal networks and citizen encounters. In the new AgoraEU programme, this aspect could be included either in Article 9, 'Democratic participation and rule of law', or in Article 7, 'Rights, equality, citizens and civil society'.</p>

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<i>Article 7</i>	
<i>Rights, equality, citizens and civil society</i>	<p>RO (Comments):</p> <p>We welcome measures promoting equality and combating discrimination, and support explicitly referencing multiple and intersectional discrimination.</p> <p>We support referring explicitly to women and girls with disabilities as a high-risk group, and strengthening digital rights protections by linking children's rights, online safety and gender-based violence, especially cyber-violence.</p> <p>BE (Comments):</p> <p>Request to include a focus on mainstreaming equality/non-discrimination policies.</p> <p>In the previous program, there was also a reference to xenophobia as well as details on forms of intolerance (“including homophobia, biphobia, transphobia, interphobia, and intolerance on the basis of gender identity, both online and offline”). why these references are no longer included?</p>
Within the CERV+ strand, the ‘Rights, Equality, Citizens and Civil Society’ specific objective shall focus on:	<p>DE (Comments):</p>

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	<p>Unlike in the current CERV programme, the EU Commission's proposal makes no mention of exchanges between citizens of different Member States. These exchanges are currently included in one of the four existing CERV strands ('Citizens' engagement and participation'). In practice, this aspect is implemented through municipal partnerships (town twinning), municipal networks and citizen encounters. In the new AgoraEU programme, this aspect could be included either in Article 9, 'Democratic participation and rule of law', or in Article 7, 'Rights, equality, citizens and civil society'.</p>
<p>(a) promoting equality, and preventing and fighting against discrimination on the grounds of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, and all forms of racism and intolerance;</p>	<p>FI (Drafting suggestions):</p> <p>(a) promoting equality, and preventing and fighting against discrimination on the grounds of sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation or gender identity, and all forms of racism and intolerance;</p> <p>FI (Comments):</p> <p>We suggest adding "gender identity", in line with the paragraph 15.</p> <p>BE (Comments):</p> <p>7a, Addition about the need to respect the principle of non-discrimination on the grounds set out in Article 21 of the Charter.</p> <p>AT (Drafting suggestions):</p> <p>(a) promoting equality, and preventing and fighting against discrimination on the grounds of sex, <u>gender</u>, racial or ethnic origin, religion or belief, disability, age or sexual orientation, and all forms of racism and intolerance;</p>

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	<p>AT (Comments): Please add gender. Based on the results of the 3rd wave of the FRA LGBTIQ+ Survey, intersex and transgender persons are at high risk of discrimination (EU LGBTIQ Survey III European Union Agency for Fundamental Rights). Explicitly taking into account both sex and gender is a prerequisite for adequate protection of at-risk individuals and communities.</p> <p>NL (Drafting suggestions): promoting equality, and preventing and fighting against discrimination on the grounds of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, gender identity, and all forms of racism and intolerance, both online and offline; including xenophobia, homophobia, lesbophobia, biphobia, transphobia, interphobia and intolerance on the basis of gender identity, as well as multiple and intersectional discrimination;</p> <p>NL (Comments): In line with the formulation in the current CERV Regulation (Art. 4) and new policy priorities, promoting equality and fighting discrimination concerns both online and offline.</p> <p>In order to address an increasingly prominent form of discrimination NL requests adding "gender identity" as a discrimination ground in the list.</p> <p>The requested addition at the end of 7a. aims to ensure that the substrand in the current CERV Regulation Article 4.2.c), which aims to combat 'racism, xenophobia and all forms of intolerance, including homophobia, biphobia, transphobia, interphobia and intolerance on the basis of gender identity' is still reflected in the CERV+ priorities. 'Lesbophobia' reflects the intersection</p>

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	<p>of sexism and homophobia and results in specific patterns of discrimination that are not captured by the broader term ‘homophobia’, and should be specifically mentioned.</p> <p>This amendment also makes explicit the need to address multiple and intersectional discrimination, recognising that individuals often face overlapping forms of inequality (for example, on grounds of sex, sexual orientation and racial or ethnic origin). Including this language ensures the Programme reflects evidence from FRA and EIGE, aligns with the Charter of Fundamental Rights, and the EU Gender Equality Strategy.</p>
<p>(b) promoting gender equality, gender mainstreaming and women’s empowerment, and protecting and promoting women’s full enjoyment of rights;</p>	<p>DE (Drafting suggestions):</p> <p>(b) promoting gender equality and the empowerment of all women and girls, gender mainstreaming and women’s empowerment, and ensuring protecting and promoting women’s full and equal enjoyment of all human rights;</p> <p>DE (Comments):</p> <p>The wording (first part) should be based on SDG 5.</p> <p>NL (Drafting suggestions):</p> <p>promoting gender equality, including work-life balance; gender mainstreaming; women’s empowerment, and protecting and promoting women’s full enjoyment of rights;</p> <p>NL (Comments):</p>

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	Work-life balance is also an element, in line with current Art. 4 (2) a of the CERV Regulation.
(c) promoting accessibility and protecting and promoting the rights of persons with disabilities, supporting the EU implementation of the UN Convention on the Rights of Persons with Disabilities;	
(d) protecting and promoting the rights of the child;	
(e) protecting and promoting freedom of expression, the right to privacy, the protection of personal data as well as rights in the digital space;	<p>IE (Drafting suggestions): (e) protecting and promoting freedom of expression, the right to privacy, the protection of personal data as well as rights in the digital space including through combatting disinformation;</p> <p>IE (Comments): Ireland notes that combatting disinformation is also about supporting fundamental rights. Ireland’s National Counter Disinformation Strategy takes a rights-based approach. In this regard, it might be worthwhile considering mention of combatting disinformation as a way of vindicating people’s rights, including the right to freedom of expression and the other rights set out here.</p>
(f) nurturing a vibrant civic space by building the capacity of, and providing financial support to, civil society organisations, human rights defenders, and other relevant actors, which are active at all levels in protecting, promoting and raising citizen’s awareness of rights enshrined in the Treaty, promoting EU democratic resilience, non-discrimination and equality and	<p>IE (Drafting suggestions): (f) nurturing a vibrant civic space by building the capacity of, and providing financial support to, civil society organisations, human rights</p>

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<p>more broadly Union values, such as the respect for fundamental rights, the rule of law, democracy and in protecting and promoting respect of the Charter.</p>	<p>defenders, and other relevant actors, which are active at all levels in protecting, promoting and raising citizen’s awareness of rights enshrined in the Treaty, promoting EU democratic resilience, non-discrimination and equality and more broadly Union values, such as the respect for fundamental rights, the rule of law, participation in public policy processes, democracy and in protecting and promoting respect of the Charter.</p> <p>IE (Comments): Ireland suggests including a reference to civil society organisations’ role in public policy.</p> <p>DE (Comments): It seems that there is an overlap between Erasmus+, which also aims at fostering Union values and a European identity. How does COM intend to avoid duplications or rather where does it see clear demarcations between the two programmes?</p> <p>AT (Drafting suggestions): (f) nurturing a vibrant civic space by building the capacity of, and providing financial support to, civil society organisations, human rights defenders, and other relevant actors, <u>including those representing young people</u>, which are active at all levels in protecting, promoting and raising citizen’s awareness of rights enshrined in the Treaty, promoting EU democratic resilience, non-discrimination and equality and more broadly Union values, such as the respect for fundamental rights, the rule of law, democracy and in protecting and promoting respect of the Charter.</p> <p>AT (Comments):</p>

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	<p>Enhance the focus on young people and youth organisations, in order to be able to support their activities on such topics and cross-border cooperation with their counterparts in different countries.</p> <p>It is important that small civil society organisations continue to benefit from the programme. A low-threshold approach with minimal requirements and the possibility for national organisations and associations to distribute funds is therefore needed.</p> <p>HU (Comments):</p> <p>We would like to draw attention to a general transparency issue that should be reflected in the text. The European Court of Auditors and the Commission itself have recently acknowledged concerns about transparency and accountability in the area of NGO funding under direct management programmes. In this context, there is a risk that certain politically active NGOs may gain access to EU funds. These findings suggest that this is a broader, systemic issue that deserves careful consideration in all relevant EU-funded programmes and especially in CERV, which is the predecessor of Agora EU.</p> <p>Improved transparency, transferability between pillars and the resulting excessive flexibility shall be therefore addressed.</p> <p>This is essential to safeguard public trust in democratic institutions and the integrity of the EU’s financial instruments.</p> <p>NL (Drafting suggestions):</p> <p>nurturing a vibrant civic space by building the capacity of, and providing financial support, which shall include the award of operating grants to, civil society organisations, human rights defenders, and other relevant actors, which are active at all levels in protecting, promoting and raising citizen’s awareness of</p>

Commission proposal	Drafting suggestions and Comments
	<p>rights enshrined in the Treaty, promoting EU democratic resilience, non-discrimination and equality including gender equality and more broadly Union values, such as the respect for fundamental rights, the rule of law, democracy and in protecting and promoting respect of the Charter.</p> <p>NEW: (g) - supporting anti-SLAPP measures, including legal aid and capacity building for journalists, human rights defenders and civil society organisations (complementary to anti-SLAPP measures in the Justice Programme).</p> <p>NL (Comments):</p> <p>NL requests adding “including gender equality” after “equality”, as it is crucial to support CSOs promoting gender equality in the context of growing opposition to gender equality and gender equality CSOs.</p> <p>Core funding is both rare and indispensable to the existence and sustainable, efficient functioning of CSOs. It is essential that operating grants are specifically mentioned in the CERV+ Strand Regulation, as is the case in the current LIFE Regulation, to ensure that the EU continues to provide such core funding in the next MFF .</p> <p>In order to ensure that complementarity established by the new recital (13a) is also reflected at operational level, NL requests to amend Article 7 of the AgoraEU proposal by adding an additional point to the list of eligible actions.</p> <p>This addition would explicitly allow for funding of anti-SLAPP activities under the AgoraEU Programme in line with Directive (EU) 2024/1069 and Commission Recommendation (EU) 2022/758, while maintaining the</p>

Commission proposal	Drafting suggestions and Comments
	<p>programme’s focus on democracy, media freedom and civil society, and complementarity with anti-SLAPP measures in the Justice Programme.</p> <p>The requested amendment would not expand the overall scope of the AgoraEU Programme but would merely clarify the eligibility of actions already consistent with its general objectives and strands and would thus create a coherent legal and operational foundation for a dual (judicial and societal) anti-SLAPP protection model without overlap.</p>
	<p>SI (Drafting suggestions):</p> <p>Add point (g): “promoting re-granting mechanisms and simplified procedures for small-scale projects implemented by local and community organisations.”</p> <p>Add point (h): supporting strategic-litigation defence and anti-SLAPP measures, including legal aid and capacity-building for journalists, human-rights defenders and civil-society organisations.</p> <p>SI (Comments):</p> <p>Makes re-granting a standing feature of implementation, avoiding case-by-case justification in work programmes. Simplified procedures follow Financial Regulation Art. 125 and 180, reducing administrative load.</p> <p>Point (h) operationalises the <i>Recommendation (EU) 2022/758 on protecting journalists and human-rights defenders from SLAPPs</i> and the forthcoming <i>Anti-SLAPP Directive (EU) 2024/1704</i>. Inclusion guarantees eligibility of preventive and legal-support actions within AgoraEU’s Rights and Media strands.</p>

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<i>Article 8</i>	
<i>Daphne</i>	<p>FR (Comments): France requests that the objective of implementing EU Directive 2024/1385 on combating violence against women and domestic violence be added. This is a major instrument in this area. In addition, in order to clarify Article 8 and give it more impact, France suggests a rewording, aimed at grouping the various ideas into clearly identified paragraphs</p>
Within the CERV+ strand, the ‘Daphne’ specific objective shall focus on:	
<p>(a) preventing, responding to and fighting at all levels all forms of gender-based violence against women and girls, domestic violence, and violence against children, young and older people, LGBTIQ people, persons with disabilities and other groups at risk;</p>	<p>IE (Comments): Ireland welcomes this objective, the groups covered and the intention to not omit any group with reference to “other groups at risk”.</p> <p>FR (Drafting suggestions): (a) preventing, responding to and fighting at all levels all forms of gender-based violence against women and girls, domestic violence, and child victims and supporting the achievement of the objectives of the directive EU 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence as well as the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul</p>

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	<p>Convention) in the Union; violence against children, young and older people, LGBTIQ people, persons with disabilities and other groups at risk;</p> <p>DE (Drafting suggestions):</p> <p>(a) preventing, responding to and fighting at all levels all forms of gender-based violence against women and girls, domestic violence, and violence against children, young and older people, LGBTIQ people, persons with disabilities and other groups at risk;</p> <p>DE (Comments):</p> <p>The programme should aim to protect against all forms of gender-based violence. Alternatively it could be formulated: "... especially against women and girls"</p> <p>BE (Comments):</p> <p>Addition a mention on LGBTQIA+ rather than LGBTIQ and vulnerable groups rather than at-risk groups.</p> <p>HU (Drafting suggestions):</p> <p>a) preventing, responding to and fighting at all levels all forms of gender-based violence against women and girls, domestic violence, and violence against children, young and older people, LGBTIQ people, persons with disabilities and other groups at risk;</p> <p>HU (Comments):</p>

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	First of all, the Fundamental Law of Hungary only recognises two genders, second of all, the agreed language within the Council is “LGBTI” without the “Q”. Therefore the term LGBTIQ is unacceptable to us.
	FR (Drafting suggestions): (b) preventing, responding to and fighting at all levels all forms of violence against children, young and older people, LGBTIQ people, persons with disabilities and other groups at risk;
(b) protecting and supporting all direct and indirect victims and survivors of violence as referred in point (a);	FR (Drafting suggestions): (b) (c) protecting and supporting all direct and indirect victims and survivors of violence as referred in point (a) and (b);
(c) supporting the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women and domestic violence in the Union.	FR (Drafting suggestions): (e) — supporting the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women and domestic violence in the Union. FI (Drafting suggestions): (c) supporting the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women and domestic violence in the Union and the EU Directive on combating violence against women and domestic violence. FI (Comments):

Commission proposal	Drafting suggestions and Comments
	<p>We suggest adding a reference to the EU directive on combating violence against women and domestic violence as it is central element, together with Istanbul Convention to combat gender-based violence in the EU.</p> <p>BE (Comments): add a mention about promoting, in addition to its achievements and objectives, the standards of the Istanbul Convention</p> <p>HU (Drafting suggestions): (c) supporting the achievement of the objectives supporting the implementation of the Council of Europe Convention on preventing and combating violence against women and domestic violence in the Union by the EU insofar as it has acceded to the Convention.</p> <p>HU (Comments): We suggest aligning this text with the reference to the UNCRPD in Article 7. c) and sufficiently reflect the fact that the Istanbul Convention is a mixed agreement to which the EU has acceded only partially (while not all Member States are parties to the Convention).</p> <p>NL (Drafting suggestions): c) supporting the achievement of the objectives of the Council of Europe Convention on preventing and combating violence against women and domestic violence in the Union and the <i>EU Directive on combating violence against women and domestic violence.</i></p> <p>NL (Comments):</p>

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	<p>The EU Directive on combating violence against women and domestic violence is a groundbreaking Directive, which contains many key provisions to prevent and criminalise certain forms of gender-based violence, protect and support victims and ensure their access to justice. The CERV+ strand must support the implementation of the Directive at the national level.</p>
	<p>RO (Drafting suggestions):</p> <p>We warmly welcome strengthening the EU framework for combating gender-based violence and integrating gender mainstreaming across the programme. We propose a new point (d) supporting training and capacity-building for professionals and NGOs working in preventing and combating gender-based violence, domestic violence and violence against vulnerable groups.</p> <p>SI (Drafting suggestions):</p> <p>Add point (d): “supporting awareness-raising and prevention measures addressing perpetrators, educational systems and workplaces.”</p> <p>SI (Comments):</p> <p>Broadens preventive scope beyond victim assistance, consistent with the new Violence Directive and the Istanbul Convention. Emphasises primary prevention and social-norm change, enhancing long-term impact.</p>
<i>Article 9</i>	

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Commission proposal	Drafting suggestions and Comments
<i>Democratic participation and rule of law</i>	
<p>Within the CERV+ strand, the ‘Democratic participation and rule of law’ specific objective of the Programme shall focus on:</p>	<p>DE (Comments): Unlike in the current CERV programme, the EU Commission's proposal makes no mention of exchanges between citizens of different Member States. These exchanges are currently included in one of the four existing CERV strands (‘Citizens' engagement and participation’). In practice, this aspect is implemented through municipal partnerships (town twinning), municipal networks and citizen encounters. In the new AgoraEU programme, this aspect could be included either in Article 9, ‘Democratic participation and rule of law’, or in Article 7, ‘Rights, equality, citizens and civil society’.</p>
<p>(a) protecting and promoting Union citizenship rights as well as citizens’ participation and engagement in the democratic and civic life of the Union, and support open, resilient, rights-based, and equal societies based on the rule of law;</p>	<p>IE (Drafting suggestions): (a) protecting and promoting Union citizenship rights as well as citizens’ and civil society organisations’ participation and engagement in the democratic and civic life of the Union, and support open, resilient, rights-based, and equal societies based on the rule of law;</p> <p>IE (Comments): Ireland proposes including a reference to civil society organisations.</p> <p>BE (Comments): Who can apply to this calls? It is important to also mention the support for civil society organisations that are active at local, regional, national and transnational level.</p>

Commission proposal	Drafting suggestions and Comments
	<p>AT (Drafting suggestions):</p> <p>(a) protecting and promoting Union citizenship rights as well as citizens' participation and engagement in the democratic and civic life of the Union, and support open, resilient, rights-based, and equal societies based on the rule of law; <u>Promoting citizens' and representative associations' participation in and contribution to the democratic and civic life of the Union, including a youth and intergenerational perspective;</u> <u>Promoting exchanges between citizens of different countries through town-twinning and networks of towns;</u></p> <p>AT (Comments):</p> <p>Citizens' and representative associations', town-twinning and networks of towns should be explicitly mentioned (under (a) or in a new paragraph). Their participation is an important part of the current CERV programme. This is how many CSOs access the programme for the first time and gather citizens to debate and create policy solutions. Ensure that CERV+ supports young people, tying it with the upcoming EU Intergenerational Fairness Strategy.</p> <p>SI (Drafting suggestions):</p> <p>Add to (a): “, including local-level civic dialogues and participatory democracy projects.”</p> <p>SI (Comments):</p>

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	<p>Grounds the democracy strand in everyday participation, resonating with the European Citizens’ Panels model. This fosters territorial balance and complements representative democracy mechanisms</p>
<p>(b) supporting free, fair, resilient, accessible and inclusive electoral and democratic processes;</p>	<p>LV (Comments): We would appreciate further clarification on the reference to “accessible democratic processes” under sub-point (b). Sub-point (a) already addresses citizens’ participation and engagement in democratic life in the Union, based on the rule of law. Could the Commission elaborate on how sub-point (b) differs in scope and objective and why this specific dimension is highlighted separately? To what extent does it add value beyond what is already covered under sub-point (a)?</p> <p>BE (Comments): Could COM explain what exactly is meant by electoral and democratic processes?</p> <p>HU (Drafting suggestions): (b) supporting free, fair, resilient, accessible and inclusive electoral and democratic processes; <u>in full respect of Member States’ competences in organising elections</u></p> <p>HU (Comments): The organisation of elections is national competence. We do not want a wording that may suggest otherwise, this is why we prefer to spell this out.</p>

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<p>(c) promoting civic awareness and better understanding of the Union, its common history, memory and diversity to foster mutual understanding and tolerance.</p>	<p>LV (Drafting suggestions):</p> <p>(c) promoting civic awareness and better understanding of the Union, its common history, values, memory and diversity to foster mutual understanding and tolerance, <u>including through exchanges between citizens of different countries.</u></p> <p>LV (Comments):</p> <p>Would this point also cover initiatives such as town-twinning and networks of towns? If not, we propose a suggestion in this point.</p> <p>DE (Comments):</p> <p>See comment on Article 7 (1) lit. f above.</p> <p>BE (Comments):</p> <p>Which actions are targeted by this article? What is the state of town twinning and city networks. Are they removed from the CERV program? CERV today also refers to culture and cultural heritage of the Union as a way to enhance understanding of the Union, we would like to keep this reference to culture.projects aimed at raising awareness.</p> <p>AT (Drafting suggestions):</p> <p>(c) promoting civic awareness and better understanding of the Union, its common history, memory, remembrance and diversity to foster mutual understanding and tolerance, <u>especially among young people.</u></p>

Commission proposal	Drafting suggestions and Comments
	<p>AT (Comments): Support for remembrance projects is extremely important and should be explicitly mentioned. Include a special focus on young people.</p> <p>HU (Drafting suggestions): c) promoting civic awareness and better understanding of the Union, its common history, memory, including the remembrance of the victims of totalitarian regimes, and diversity to foster mutual understanding and tolerance.</p> <p>HU (Comments): We suggest strenghtening the message about shared history by referring to this specific category.</p> <p>NL (Drafting suggestions): promoting civic awareness and better understanding of the Union, its common history, memory and diversity, including through support for projects that commemorate key moments in modern European history – such as the rise of authoritarian and totalitarian regimes and their causes and consequences – and that strengthen citizens’ awareness of Europe’s shared heritage, to foster mutual understanding and tolerance.</p> <p>NL (Comments): Engaging projects of commerance, memory and history tied to value promotion are key to make abstract values tangible and resonate, deserving explicit attention in line with the previous CERV Regulation.</p>

Commission proposal	Drafting suggestions and Comments
	<p>RO (Drafting suggestions):</p> <p>We support introducing a new point establishing a Consultative Committee for AgoraEU with representatives from civil society in all Member States, to ensure regional and cultural diversity in programme governance.</p> <p>We also support introducing a new point aiming to stimulate the participation of young EU citizens belonging to diaspora communities in projects under CEDV+, by establishing adequate selection criteria or participation targets.</p>
Chapter V	
Cross-cutting and horizontal priorities and activities	<p>LV (Comments):</p> <p>Latvia fully understands the need to ensure flexibility within the Programme to respond more effectively to future challenges. However, this must be balanced with providing stability and predictability for sectors relying on support from the Creative Europe, MEDIA, and CERV strands. Therefore, Latvia proposes considering the inclusion of an indicative percentage in Article 10, specifying the share of the overall Programme budget that will be allocated to support these horizontal actions.</p>

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<p><i>Article 10</i></p>	<p>BE (Comments): For the sake of clarity: Shouldn't a new section dedicated to cross-sectoral issues be added? This is a comment we had already made regarding Article 3, in particular to strengthen the cross-cutting dimension. What is the source of funding? What synergies are envisaged?</p> <p>AT (Comments): We support possibilities for cross-cutting cooperation, but would ask the COM for more information on implementation. Will there be special calls and earmarked budget? Or shall activities be eligible and funded under regular calls of the three strands?</p>
<p>Within the general objectives set out in Article 3, the Programme shall support the following cross-cutting and horizontal priorities and activities:</p>	<p>PL (Comments): To ensure transparency, each cross-cutting and horizontal priority and action should be defined exhaustively.</p> <p>IE (Comments): We note that allocations for Strand 1-3 are included in the appendix to proposal, but no indication of proportion that could be spent on cross-sectoral projects is identified.</p> <p>While we support the inclusion of cross-cutting projects, and some flexibility is required, Ireland is still concerned that without clarity on the parameters or budgeting of this it could have a detrimental impact on level of funding available in core culture, media or CERV areas.</p>

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	<p>DE (Comments):</p> <p>GER supports the creation of support opportunities for EU-wide media projects, services, and collaborations in the field of public service media via Article 10. This includes, for example, cross-border media platforms that provide reliable news and showcase Europe's rich and diverse cultural and linguistic heritage.</p> <p>HU (Comments):</p> <p>The cross-sectoral strand of the Creative Europe programme defined those objectives (and actions) whose support within the programme was of a complementary but indispensable nature — including horizontal issues and actions such as supporting the objectives of the rotating Presidency and the financing of the national desks — as well as other horizontal and complementary actions affecting the Culture and MEDIA strands. In the present draft, the formulation of the horizontal objectives of the AgoraEU programme does not, or only in a much more limited way, reflect the objectives and the foundations of the actions previously supported under the cross-sectoral strand.</p> <p>We recommend preserving the previous formulations and actions, even by splitting the article to list the former CERV-specific and Creative Europe-specific cross-sectoral/horizontal objectives.</p>
<p>(a) cross-sectoral cooperation and innovation across the cultural, media and civic fields, and protection of the integrity of the public discourse, thereby bolstering democratic resilience, societal preparedness and cultural and civic engagement;</p>	<p>PL (Drafting suggestions):</p> <p>cross-sectoral cooperation and innovation across the cultural, media and civic fields, exploring health and culture synergies, cohesion policy, edukaction and protection of the integrity of the public discourse, thereby</p>

Commission proposal	Drafting suggestions and Comments
	<p>bolstering democratic resilience, societal preparedness and cultural and civic engagement;</p> <p>PL (Comments): What is meant by “civic fields” and “integrity of the public discourse”?</p> <p>IT (Drafting suggestions): (a) cross-sectoral cooperation and implementation of innovative approaches across the cultural, media and civic fields, and protection of the integrity of the public discourse, thereby bolstering democratic resilience, societal preparedness and cultural and civic engagement;</p> <p>HR (Drafting suggestions): cross-sectoral cooperation and innovation across the cultural, media and civic fields, and protection of the integrity of the public discourse, thereby bolstering democratic resilience, societal preparedness, and cultural and civic engagement and participation</p> <p>HR (Comments): We propose that the civic participation introduced in the text of the article for emphasizing the importance of active involvement of citizens in the political life on local, regional, national and transnational level</p> <p>DE (Comments): Could COM please elaborate on the relationship between this paragraph and Horizon Europe?</p> <p>CZ</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(a) cross-sectoral cooperation and innovation across the cultural, media and civic fields of culture, media and Union values, and protection of the integrity of the public discourse, thereby bolstering democratic resilience, societal preparedness and cultural and civic engagement</p> <p>CZ</p> <p>(Comments):</p> <p>See above our explanation to Art. 3 par. 3.</p> <p>AT</p> <p>(Comments):</p> <p>Are Creative Innovation LABs included here, will this action be prolonged or phased-out?</p> <p>HU</p> <p>(Drafting suggestions):</p> <p>a) cross-sectoral cooperation and innovation across the cultural, media and civic fields, and protection of the integrity of the public discourse, by enhancing citizens’ media literacy skills thereby bolstering democratic resilience, societal preparedness and cultural and civic engagement;</p> <p>HU</p> <p>(Comments):</p> <p>No such wording on cross-sectoral cooperation can be found in the legal basis of the Creative Europe programme, where the focus is instead on media literacy, not on the “<i>protection of the integrity of public discourse</i>,” which could mean almost anything. In our view, outside the MEDIA strand, the cultural sphere’s contribution to improving the quality of public discourse lies primarily on the user side; from a general, societal perspective, this is the responsibility of the state - as rightly stated in the 2021 Regulation, which aims to enhance citizens’ media literacy skills.</p>

Commission proposal	Drafting suggestions and Comments
<p>(b) a responsible use of innovative tools and content technologies, notably Artificial Intelligence, as well as skills development and capacity-building through cross sectoral approaches;</p>	<p>PL (Comments): Does the term "responsible" refer to green transformation, sustainable development, taking into account the needs of people with disabilities or some other aspect? Clarification is needed.</p> <p>LV (Drafting suggestions): (b) a responsible use of innovative tools and content technologies, notably Artificial Intelligence, as well as skills development and capacity-building through cross sectoral approaches and with respect to copyright;</p> <p>LV (Comments): Latvia welcomes the focus on actions aimed at the responsible use of innovative tools, particularly artificial intelligence. At the same time, Latvia proposes to an explicit reference to respect for copyright. While we acknowledge that this may be partially covered by the term 'responsible use', a clearer mention would be beneficial given the significance and complexity of the relationship between copyright and AI.</p> <p>IT (Drafting suggestions): (b) a responsible and sustainable use of innovative tools and content technologies, notably Artificial Intelligence, addressing comon challenges such as copyright protection, ethics, transparency, skills development and capacity-building through cross sectoral approaches;</p> <p>IT (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>Human creativity should be at the heart of this paragraph. Besides responsible use (who should be responsible?), which should be clarified, there is also a need to identify measures to ensure protection of copyright protected content in the training of generative AI models and their outputs which may have a negative impact on cultural diversity, creativity and media plurality, as stressed in the Apply AI Strategy.</p> <p>We also suggest to include other common challenges mentioned in the Apply AI strategy, which include access to ethical, transparent, inclusive and high-quality models, monetising specialised AI models, securing diverse funding sources, and cultivating advanced skills and addressing the complex dynamics generated by the prominence of major technology firms in the sectors which may influence cultural diversity and the innovation capacity of smaller organisations.</p> <p>IE (Comments): A.I. and skills development could give rise to large funding needs and this could significantly detract from funding available for core culture, media and CERV programmes. Funding for AI and skills development should be complimentary with other EU funding programmes (e.g. Erasmus/Horizon).</p> <p>HR (Comments): It would be useful to clarify how cross-sectoral cooperation and innovation will be implemented in practice under Article 10, how the concept of “responsible use” of AI will be defined, what forms of cooperation are envisaged among national authorities and stakeholders, and how the financing of these horizontal activities will be determined according to their nature and scope? We recommend specifying clear ethical standards and data-protection safeguards for AI and other innovative tools. Skills</p>

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	<p>development and capacity-building measures could also highlight accessibility for diverse and vulnerable groups</p> <p>BE (Comments): What is understood by the term ‘responsible use’?</p> <p>AT (Comments): We very much welcome capacity building regarding AI, which will be increasingly relevant for CCS, CSOs and equality bodies.</p>
<p>(c) actions for the development, implementation, and monitoring of relevant Union legislation and policy in the culture, media and civic fields, including, where applicable, through cooperation among national authorities and stakeholders.</p>	<p>LV (Comments): Latvia invites the European Commission to clarify the objective and practical significance of this point — specifically, how actions aimed at the development, implementation, and monitoring of the relevant Union legislation and policies could be implemented in practice</p> <p>Latvia emphasizes the need for an explicit reference in the recitals and the main text to EU structural dialogue with stakeholders, as outlined in the Cultural Compass and EU Civil Society Strategy.</p> <p>CZ (Drafting suggestions): (c) actions for the development, implementation, and monitoring of relevant Union legislation and policy in the culture, media and civic fields of culture, media and Union values, including, where applicable, through cooperation among national authorities and stakeholders.</p> <p>HU (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>We suggest aligning the language to make it more precise similarly to the wording included in Regulation (EU) 2021/692 establishing the CERV programme. In its paragraph (3) of Annex I, it refers to analytical and monitoring activities to improve the implementation of Union legislation. We find this wording more appropriate since the implementation of Union legislation is not a matter for potential beneficiaries of the future AgoraEU programme to ensure, however they can contribute by appropriate, specifically designed means.</p>
<p>(d) in line with the provisions of the Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance], the promotion of the Programme, and its funding opportunities, including through Programme Desks, thereby enhancing outreach, visibility and the dissemination of the Programme results;</p>	<p>IT (Drafting suggestions): (d) in line with the provisions of the Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance], the promotion of the Programme, and its funding opportunities, including through Programme Stands Desks, thereby facilitating their cooperation and enhancing outreach, visibility and the dissemination of the Programme results;</p> <p>IT (Comments): Given that Desks are an essential element for the effective functioning of the Program, as noted in the impact assessments, and given that Article 10 refers to Program Desks, we request that Member States be required to establish them and that the relevant funding lines and co-financing percentage be specified. Well-resourced Programme Desks, with strand-specific expertise and indicators are key to ensure transparency, comparability with current programmes, and effective support delivery. Our suggested wording clarifies that there will be separate national contact points responsible for promotion and technical assistance for the three AgoraEU components: Creative Europe – Culture, Media+, and former CERV.</p>

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	<p>Their cooperation will also be essential, but there is a need to build their capacity to engage stakeholders across all the areas of AgoraEU to implement cross-cutting activities.</p> <p>IE (Comments):</p> <p>Any additional text in relation to Programme Desks should:</p> <ul style="list-style-type: none"> - Either make explicit reference also to Contact Points (currently in place to support CERV) or make it clear that ‘Programme Desks’ is used as a generic term to cover both (Creative Europe) Programme Desks and (CERV) Contact Points. For example: ‘the establishment and activities of Programme Desks or their equivalent for each individual strand - The primary function of the Programme Desks/Contact Points should be clearly set out and the text should also address concerns around resourcing for, and expertise of, the Desks. If the new programme expands in size as per the Proposal, the Desks will also have to expand in size and expertise to meet the new demands and new elements such as the news media provisions. We believe that more clarity on the structure of the Desks under the proposed programme should be provided in the Regulation, together with more clarity on how clarity on how Programme Desks will be resourced to support cross-cutting proposals. <p>HR (Drafting suggestions):</p> <p>in line with the provisions of the Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance], the promotion of the Programme, and its funding opportunities, including through Programme Desks and National Contact Points or National contact Desks, thereby enhancing outreach, visibility and the dissemination of the Programme results and its strands; with targeted outreach strategies to encourage</p>

Commission proposal	Drafting suggestions and Comments
	<p>participation of smaller organizations and local initiative, and leveraging partner networks and digital platforms to enhance visibility, dissemination, and impact of the Programme’s results.</p> <p>HR (Comments):</p> <p>1. We believe it would be necessary to have both networks mentioned or find a solution to have one name of the desks/national contact points that reflects both networks - the Creative Europe- culture and CERV programme, for example National contact desks.</p> <p>We recommend specifying outreach strategies to encourage participation of smaller organizations and local initiatives. Leveraging partner networks and digital platforms could enhance visibility, dissemination, and impact of the Programme’s results.</p> <p>FR (Drafting suggestions):</p> <p>(d) in line with the provisions of the Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance], the promotion of the Programme, and its funding opportunities, including through Programme Desks’ funding, thereby enhancing outreach, visibility and the dissemination of the Programme results;</p> <p>FR (Comments):</p> <p>The French authorities would like Article 10 to explicitly mention that the Programme Desks will be funded through cross-cutting actions.</p> <p>FI (Drafting suggestions):</p> <p>...including through support to activities of Programme Desks in participating countries...</p>

Commission proposal	Drafting suggestions and Comments
	<p>FI (Comments): Funding of the programme desks needs to be explicitly included in the Regulation, not only promotion of the Programme through Programme Desks.</p> <p>Furthermore, Finland would like to include here [or under the financial provisions] a provision that would clarify the cooperation modalities between the Commission and the programme desks, especially as regards to the granting mechanisms and the length of the contracts. Finland supports simplified and streamlined granting processes and <u>longer contract periods for all programme desks</u> (minimum 3 years contracts), as this would reduce bureaucracy both at the Commission as well as Member State -level. In line with the general objectives of streamlining and simplification, Finland would also welcome clarifications on the <u>funding model</u> to be selected for the Programme Desks. In our experience, the lump sum “type 2” (in place for the current Creative Europe desks) seems to be more effective and more flexible than the lump sum “type 1”, currently selected for the CERV desks.</p> <p>BE (Drafting suggestions): <u>(da) the establishment and activities of Programme Desks in participating countries to stimulate cross-border cooperation and the exchange of best practices within the sectors covered by the Programme. In addition, the Programme Desks may also have the responsibility for providing impartial guidance, practical information and assistance to applicants, stakeholders and beneficiaries of the Programme with all the aspects thereof, including in relation to the application procedure, dissemination of user-friendly</u></p>

Commission proposal	Drafting suggestions and Comments
	<p><u>information and Programme results, inquiries for partners, training and formalities.</u></p> <p>BE (Comments):</p> <p>There should be more transparency on the organisation, tasks and funding of the Programme Desks. The desks play an important role in networking, fostering cooperation, and facilitating the exchange of best practices. Why are these aspects not mentioned? More generally, how does the COM see the functioning of the desks? Does the COM envisage having Desks for each strand/sector? How will the desk be financed? And what is the link between the Regulation on the performance framework and the programme desks? It might be better to include an additional paragraph focusing specifically on the programme desk. => See also our remark on recital 36.</p> <p>Regarding the performance framework: We would like to ask the COM to provide us with a table listing the indicators and their link to the various programmes proposed. Who will decide on the choice of indicators per programme? How does the COM plan to involve Member States?</p> <p>Annex II of the Regulation on the performance framework lists logos that beneficiaries are required to use when receiving funding. Does this imply that the sectoral programmes and programme desks would no longer have their own branding?</p> <p>AT (Comments):</p> <p>The name of the Programme Desks doesn't refer to the programme name!? MS should have the flexibility to decide about their structure and branding (one-stop-shop or more entities, e.g. keeping the Creative Europe Desk and the CERV Desk)</p>

Commission proposal	Drafting suggestions and Comments
	<p>HU (Comments): Regarding Article 10 (d), we are concerned by the lack of clarity regarding the framework for the operation, tasks and funding of the Programme Desks. First, it is not clear how the current tasks and functions of the Programme Desks linked to the Creative Europe programme would be shaped within the AgoraEU programme. It would seem justified to supplement this part of the text with an explicit description — for instance, stating that the purpose of the Programme Desks is to promote the programme, provide information, support applicants, and assist the Commission in ensuring appropriate communication and dissemination of the programme’s results among citizens and stakeholders of the cultural and creative sectors. Furthermore, the text does not clarify whether the mandate of existing Creative Europe Desks would remain unchanged or they would also be expected to take on responsibilities related to the CERV programme. If the latter: what specific tasks this would entail, and whether they would receive an increased budget to fulfil these additional functions. The Desks make a fundamental contribution to the success of the programme, yet their funding has already been limited during the current programming period, and therefore a review of their financing is essential in order for them to be able to fulfil the tasks of the next period.</p> <p>NL (Drafting suggestions): in line with the provisions of the Regulation (EU) [XXX]* of the European Parliament and of the Council [Performance], the promotion of the Programme, and its funding opportunities, including through Programme Desks and national contact points, thereby enhancing outreach, visibility and the dissemination of the Programme results;</p> <p>SK</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The role, the scope of activities, the organisation/arrangement and the funding of Programme Desks should be specified. SK is in favour of having two desks – one for Creative Europe – Culture and MEDIA+ and the other one for CERV+ to maintain the brands and technical competence and to safeguard continuity.</p>
	<p>LV</p> <p>(Drafting suggestions):</p> <p><u>(new article or sub-point)</u> <u>the establishment and activities of Programme Desks in participating countries to stimulate cross-border cooperation and the exchange of best practices within the sectors covered by the Programme. In addition, the Programme Desks may also have the responsibility for providing impartial guidance, practical information and assistance to applicants, stakeholders and beneficiaries of the Programme with all the aspects thereof, including in relation to the application procedure, dissemination of user-friendly information and Programme results, inquiries for partners, training and formalities.</u></p> <p>LV</p> <p>(Comments):</p> <p>Programme desks and national contact points play a crucial role in the successful implementation of the Programme. Therefore, Latvia would like to see a more prominent reference to the Programme contact points and desks in the proposal text. Similar to the current 'Creative Europe' programme, we wish to have a separate article for the Programme desks to ensure clarity regarding their funding and its source (for example, from which strand), and other practical aspects.</p> <p>Latvia can also support the Presidency drafting proposal.</p>

Commission proposal	Drafting suggestions and Comments
	<p>SI (Drafting suggestions): Add new (e): “establishing mechanisms for civil-society consultation, evidence-based evaluation and gender-sensitive monitoring.” Add new (f): establishing a permanent Civil Dialogue Group to assist in the preparation, implementation and evaluation of the Programme;</p> <p>SI (Comments): Integrates horizontal governance tools directly into the legal base, providing a procedural guarantee for stakeholder inclusion and gender-impact assessment under the Interinstitutional Agreement on Better Law-Making (2016). Both insertions institutionalise structured stakeholder dialogue, as mandated by Article 11 TEU and reiterated in the <i>European Economic and Social Committee’s 2024 Opinion on participatory governance in EU programmes</i>. A formal Civil Dialogue Group ensures continuity of consultation between the Commission, Member States and civil society, responding directly to Slovenia’s national position that calls for “a structured forum for ongoing dialogue on implementation”.</p>
<p>The financing of cross-cutting and horizontal priorities and activities shall be determined by their nature and scope.</p>	<p>PL (Comments): What exactly does it mean? Will implementation of these priorities and actions be mandatory? Will they be additionally financed, and if so, how? Who will decide? Transparency here is essential.</p> <p>LV</p>

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	<p>(Comments):</p> <p>Latvia would prefer more clarity in the text on who or what will determine the priorities and actions that will be supported/funded.</p> <p>IT</p> <p>(Comments):</p> <p>Cross-cutting and horizontal activities should be supported through a dedicated budget, ensuring predictability, as a legal base should do. This field of work will be innovative and ambitious, breaking silos and substantiating the reason itself of merging Culture, Media and CERV into a unique programme. We request to clarify in which part of the financial framework is co-financing for Contact points / Desks, as for previous programmes—Culture and Media (2007–2013), Creative Europe (2014–2020), and Creative Europe (2021–2027).</p> <p>IE</p> <p>(Comments):</p> <p>As above, more clarity is needed on the funding model for cross-cutting activities and the impact of this funding on Strands 1-3.</p> <p>FR</p> <p>(Comments):</p> <p>This paragraph needs to be clarified as it appears that no amount was foreseen regarding funding of cross-cutting and horizontal priorities in the impact assessment. Which funds will be used to implement this article ?</p> <p>DE</p> <p>(Comments):</p>

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	<p>Does the Commission consider to establish a minimum amount of earmarked funds within AgoraEU that cannot be transferred between the three different strands (CULTURE, MEDIA+, CERV+)? Or how else does COM intend to ensure a certain necessary degree of predictability and legal certainty? And how can be ensured that the funds used for cross-cutting and horizontal priorities do not disproportionately burden one funding area?</p> <p>AT (Comments):</p> <p>This wording is too vague. If cross-cutting activities are financed from the budget of the three strands, the wording should be more clear. And will a special budget be earmarked every year? Otherwise there is need for capping.</p> <p>HU (Comments):</p> <p>The financing of these priorities remains unclear (on which basis and how the Commission decides on the allocation of resources for these objectives and to what extent the separate budgetary lines will be used). For the sake of legal certainty, further details should appear in the legal text.</p> <p>NL (Drafting suggestions):</p> <p>The financing of cross-cutting and horizontal priorities and activities shall be determined by their nature and scope. through a transparent percentage for an earmarked budget, within the indicative financial envelope of the program. The objective of fostering synergies among the objectives of AgoraEU shall however not prejudice, disadvantage or otherwise limit the eligibility or assessment of project proposals that focus exclusively on a single objective of AgoraEU.</p>

Commission proposal	Drafting suggestions and Comments
	<p>NL (Comments): See comments made in Article 3.</p> <p>The Netherlands highly supports cross-cutting activities and want to make sure there is a dedicated budget available for these activities in order to foster them.</p> <p>Synergies between the three strands of AgoraEU may be encouraged, however, this aim should not hinder project proposals that focus exclusively on the objectives of only one of the strands, i.e. if an organisation applies for CERV+ funding for work on fundamental rights and rule of law, they shall not be obliged to also have a culture or media element in order to be eligible for funding.</p> <p>SK (Comments): .The financing of cross-cutting and horizontal activities stemming from various strands is not clear. If such activities are to be funded from the respective strand/strands of the programme, it will have an impact on the funding available under the relevant strand/s and its predictability. Perhaps a stand-alone strand for cross-cutting and horizontal activities, similar to the existing Creative Europe arrangement, should be considered.</p> <p>If cross-cutting and horizontal priorities and activities are to be identified and are to reflect the needs of the sectors, Member States are also to be involved through a programme committee</p>

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Chapter VI	

Commission proposal	Drafting suggestions and Comments
<p style="text-align: center;">Financial provisions</p>	<p>FI (Comments):</p> <p>Would it be possible to specify the funding rates (in percentages) for the different strands ? In particular, it would be important to maintain low co-financing requirements for non-profit CSOs that may not be able to access to CERV + funds in case the co-financing requirements are too high. For instance, the current Horizon regulation provides an interesting example of flexibility in terms of funding rates for non-profit entities.</p> <p>HU (Comments):</p> <p>General remark concerning Articles 10-12.: The draft does not indicate the distribution ratios of the financial resources, nor how the Commission intends to secure funding for horizontal matters, in particular for maintaining the financing of the network of national offices. At the same time, personnel costs account for a disproportionately high share. We have a general reservation as in our view nothing is agreed on the budget until everything is agreed. In addition to defining the financial allocations for the individual strands, we consider it particularly important that the provisions concerning the programme’s horizontal, administrative, personnel-related, capacity and operational financing are clearly formulated. At present, the draft does not include any control mechanism regarding the use of costs incurred in the implementation of the programme, granting instead a wide-ranging mandate solely to the European Commission for the performance of these tasks, with the possibility to mobilise additional resources under Article 12. It is therefore proposed that a control mechanism be introduced, in order to safeguard the financial interests of the European Union, also taking into account the increased budgetary framework of the programme.</p>

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<p style="text-align: center;"><i>Article 11</i></p>	<p>FR (Comments):</p> <p>The French delegation requested, in the competent <i>ad hoc</i> group dealing with the MFF, that the issue of budget allocation be addressed under the Cultural Affairs Committee. The CAC also wishes to receive regular feedback on the work of the <i>ad hoc</i> group.</p>
<p style="text-align: center;"><i>Budget</i></p>	
<p>1. The indicative financial envelope for the implementation of the Programme for the period 2028-2034 is set at EUR 8 582 000 000 in current prices.</p>	<p>PL (Comments):</p> <p>What is the purpose of EUR 250 M allocation on EC administration?</p> <p>IE (Comments):</p> <p>Ireland would welcome the inclusion of a more detailed budget breakdown to include strand by strand allocations. It will be important to retain proposed budget as wider MFF negotiations advance.</p> <p>SI (Drafting suggestions):</p> <p>The indicative financial envelope for the implementation of the Programme for the period 2028-2034 is set at EUR 8,582,000,000. This is indicative of 15.4% for the Creative Europe – Culture strand, 27.4% for the MEDIA+ strand, 33.9% for the CERV+ strand, and up to 23.1% for administrative expenditure. Transfers between strands are not to exceed 5%.</p>

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	<p>SI (Comments):</p> <p>Without prejudice to the MFF framework negotiations, the proposal establishes indicative ring-fencing. This prevents budgetary drift, ensures the visibility of equality-related funding and reflects proportionality by maintaining allocations at current performance levels</p>
<p>2. Budgetary commitments for activities extending over more than one financial year may be broken down over several years into annual instalments.</p>	
<p>3. Appropriations may be entered in the Union budget beyond 2034 to cover the expenses necessary and to enable the management of actions not completed by the end of the Programme.</p>	
<p>4. The financial envelope referred to in paragraph 1 of this Article and the amounts of additional resources referred to in Article 12 may also be used for technical and administrative assistance for the implementation of the Programme, such as preparatory, monitoring, control, audit and evaluation activities, corporate information technology systems and platforms, information and communication activities, including corporate communication on the political priorities of the Union, and all other technical and administrative assistance or staff-related expenses incurred by the Commission for the management of the Programme.]</p>	<p>DE (Drafting suggestions):</p> <p>4. The financial envelope referred to in paragraph 1 of this Article and the amounts of additional resources referred to in Article 12 may also be used for technical and administrative assistance for the implementation of the Programme, such as preparatory, monitoring, control, audit and evaluation activities, corporate information technology systems and platforms, information and communication activities, including corporate communication on the political priorities of the Union, and all other technical and administrative assistance or staff-related expenses incurred by the Commission for the management of the Programme.]</p> <p>DE (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>All staff related expenses should be bundled under heading four.</p> <p>NL (Drafting suggestions): NEW: Article 11 bis</p> <p>Earmarking of CERV+ funds for thematic strand and beneficiaries</p> <p>1. Within the amounts set out for the CERV+ Strand, the following indicative amounts shall be allocated to the following objectives: (a) at least 35% for the specific objectives set out in points (a) to (e) of Article 7 and Article 8; of which at least 40 % shall be allocated to support activities to prevent and combat at all levels all forms of gender-based violence and at least 15 % to activities promoting promoting gender equality, gender mainstreaming and women’s empowerment, and protecting and promoting women’s full enjoyment of rights; [...] 2. Within the amounts set out for the CERV+ Strand, at least 60% shall be allocated to support activities carried out by civil society organisations.</p> <p>NEW - Article 11 ter</p> <p>Funding modalities 1. The Programme shall provide for the predictable award of operating grants to civil society organisations which are involved in the development, implementation and enforcement of Union legislation and policy, and which are primarily active in the areas covered by CERV+ as set out in Articles 7, 8 and 9, to ensure their independence and sustainability, in accordance with Article 183(2)(b) of the Financial Regulation.</p>

Commission proposal	Drafting suggestions and Comments
	<p>2. The Programme shall provide the possibility for financial support to third parties, to ensure the accessibility of the CERV+ Strand for civil society organisations at local, regional, national and transnational levels, including local grassroots civil society organisations.</p> <p>NL (Comments):</p> <p>1. Article 7 a) to e) are equivalent to the current CERV strand on Equality, rights and gender equality strand (current Article 4), and Article 8 is equivalent to the current Daphne strand (current Article 6). (Article f) However, pursues similar objectives than the current Union Values strand (current Article 3)). In the current CERV Regulation, approximately 25% of CERV funds are allocated to the Equality, rights and gender equality strand (Article 4) and Daphne (Article 6). We suggest that this earmarking be increased to 35%, given that these strands are currently the most underfunded. The specific earmarking of funds for gender equality and gender-based violence are already included in the current CERV Regulation and should be maintained.</p> <p>2. One of the main objectives of the CERV+ Strand is to support civil society organisations, which are under increasing financial pressure. The earmarking of funds for civil society organisations shall be reaffirmed and reinforced, to at least 60% of the CERV+ strand amounts.</p> <p>Rationale new 11 ter: 1. Core funding is both rare and indispensable to the existence and sustainable, efficient functioning of CSOs. It is essential that operating grants are specifically mentioned in the CERV+ Strand Regulation, as is the case in the current LIFE Regulation, to ensure that the EU continues to provide such core funding in the next MFF.</p>

Commission proposal	Drafting suggestions and Comments
	2. Financial support to third parties, or ‘regranting’, is a crucial mechanism to ensure that EU funds reach national and local organisations, through intermediaries. This scheme should be continued across all thematic substrands of the CERV+ Strand. This wording is similar to the current CERV Regulation (see end of Recital 22).
<p style="text-align: center;"><i>Article 12</i></p>	<p>DE (Comments):</p> <p>The idea that member states can participate in the financing and implementation of the programme is seen as a rather cryptic proposal.</p>
<p style="text-align: center;"><i>Additional resources</i></p>	
<p>1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e), or Article 21(5) of Regulation (EU, Euratom) 2024/2509.</p>	<p>FR (Drafting suggestions):</p> <p>1. Member States, Union institutions, bodies and agencies, third countries, international organisations, <u>or</u> international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e), or Article 21(5) of Regulation (EU, Euratom) 2024/2509.</p> <p>FR (Comments):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The French authorities do not understand who are the “other third parties” as referred to in §1, that would not already be “Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions”. Therefore, they ask for deletion of these terms.</p>
<p>2. Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c), of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 11(1) of this Regulation. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes or their successors.</p>	<p>DE (Drafting suggestions):</p> <p>2. Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c), of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 11(1) of this Regulation. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes or their successors.</p> <p>DE (Comments):</p> <p>The passage “or their successors” has to be deleted. No prejudice of the MFF from 2035 onwards.</p> <p>AT (Comments):</p> <p>Up until now there was no shared management in the Creative Europe Programme (like e.g. Erasmus). Is this in fact planned under AgoraEU or just a standard wording allowing for such a possibility?</p>

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<p><i>Article 13</i></p>	<p>DE (Comments): The purpose of this provision remains unclear. While the possibility of combining EU funds with national funds would be welcome, this is not explicitly stated in the proposed regulation.</p>
<p><i>Alternative, combined and cumulative funding</i></p>	
<p>1. The Programme shall be implemented in synergy with other Union programmes. An action that has received Union contribution from another programme may also receive a contribution under this Programme. The rules of the relevant Union programme shall apply to the corresponding contribution, or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If all Union contributions are provided based on eligible cost, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p>	<p>LV (Comments): Latvia supports and positively assesses the proposed provisions that foresee the implementation of the Programme in synergy with other EU support programmes and instruments, including the possibility for a single action to receive support from multiple sources, in line with the principles of cumulative funding and under a unified legal framework. These provisions could be particularly beneficial for organisations that face challenges in securing their own funding.</p> <p>IT (Comments): The culture and audiovisual sectors should be also supported by other EU programs, complementing national and regional resources.</p> <p>For the audiovisual sector, resources should be prioritized for EU co-productions, cinemas, film education, and facilitated access to credit for SMEs.</p>

Commission proposal	Drafting suggestions and Comments
	<p>Access to credit through Invest EU and the European Investment Fund is also crucial to facilitate the relationship between the financial and credit system and companies in the sectors, especially SMEs.</p> <p>In the same way, the news sector should also be supported by other EU programmes, so the synergies between the different programmes and their complementarity with national support should be taken into account.</p> <p>FR (Drafting suggestions):</p> <p>1. The Programme shall be implemented in synergy with other Union programmes. An action that has received Union contribution from another programme may also receive a contribution under this Programme. The rules of the relevant Union programme shall apply to the corresponding contribution, or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. Should a single set of rules be applied, it shall be approved by the AgoraEU Committee as referred to in article 17. This single set of rules shall include conditions referred to in article 14. If all Union contributions are provided based on eligible cost, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p> <p>FR (Comments):</p> <p>In paragraph 1, the French authorities are worried of the risk of circumventing Article 14(3). Article 13 provides for the possibility of applying a “single set of rules” when a financing action is planned under several European programmes, including AgoraEU. However, no specific conditions are detailed regarding the content of this “single set of rules,” which could allow non-EU countries with no legislation equivalent to the AVMSD to benefit from funds allocated under MEDIA+.</p>

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	<p>French authorities therefore request that the rules governing the participation of non-EU countries in the MEDIA+ strand, amended in accordance with their comments on Article 14 below, be systematically applied when a joint action between this strand and another EU program is organised under a “single set of rules”.</p> <p>Moreover, accordingly to their comments in article 17, the Commission should be assisted by a committee to implement the programme, and this committee should have an approval power over the definition of a single set of rules applied to a joint action between AgoraEU and one or several other programmes.</p> <p>DE (Comments):</p> <p>Future instruments of EU regional policy (such as the current ERDF and ESF+) should also be mentioned as complementary financing instruments for cultural infrastructure, digitization, qualification and employment promotion in the cultural and creative sectors.</p> <p>BE (Comments):</p> <p>What exactly does point 1 mean? Does it give the right to combine two EU grants for the same project/eligible costs?</p>
<p>2. Award procedures under the Programme may be jointly conducted under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties (‘partners to the joint award procedure’), provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners to the joint award procedure may make resources available to the Programme in</p>	<p>IE (Comments):</p> <p>Ireland reiterates the need to include provision in the Proposal for Member State oversight, such as through a Programme Committee.</p> <p>FR (Drafting suggestions):</p>

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<p>accordance with Article 12 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p>	<p>2. Award procedures under the Programme may be jointly conducted under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, or international financial institutions, or other third parties (‘partners to the joint award procedure’), provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments, which the Programme Committee will be associated to accordingly with procedures defined in article 17. For that purpose, the partners to the joint award procedure may make resources available to the Programme in accordance with Article 12 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p> <p>FR (Comments): The French authorities do not understand who are the “other third parties” as referred to in §1, that would not already be “Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions”. Therefore, they ask for deletion of these terms. Moreover, this paragraph need to specify that the Programme Committee will be associated to the conclusion of these single legal commitments.</p> <p>BE (Comments): Are more details available regarding the award procedures under direct or indirect management under the programme? Could COM elaborate?</p> <p>AT</p>

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	<p>(Comments): Are there plans to extend indirect management (e.g. Culture Moves Europe, Perform Europe)?</p>
<p><i>Article 14</i></p>	
<p><i>Third countries associated to the Programme</i></p>	<p>HU (Comments): In case of 10 funds, including AgoraEU, the Commission proposes, as a new feature, the possibility of establishing partial association agreements with third countries in relation to participation in the funds concerned. As this is a horizontal issue, we believe that it should be addressed by the ad hoc working party on the MFF. We are concerned that the Commission's proposals do not provide adequate guarantees that the Council will be meaningfully involved in determining the scope and content of partial or full association agreements, particularly in the case of third countries where the COM would negotiate with the third countries concerned on the basis of the standard authorization used in FP9/the current Horizon Europe programme (acceding countries, candidate countries and potential candidates, and European Neighborhood Policy countries). In our view, this is an issue related to both governance and inter-institutional balance. The Council's role in establishing partial or full association agreements should be strengthened either horizontally, by including the same text in all funds, or by addressing this issue in the interinstitutional agreement on the new MFF.</p>

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<p>1. The Programme may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p>	<p>IT (Drafting suggestions):</p> <p>1. The Programme may be opened – with respect to specific limits and agreements to protect European cultural identity - to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to</p> <p>IT (Comments):</p> <p>The perimeter of participation of third countries cannot be opened with indefinite terms</p> <p>IE (Comments):</p> <p>Ireland supports the inclusion of third countries as appropriate but would prefer more detail in the proposal on the process for their inclusion.</p> <p>Third countries will require a certain level of reciprocity and regulatory alignment and rules around this will need to be clearly defined. This includes in respect of the suggestion already made by Ireland under Art.6 that funding should be limited to those outlets or organisations that are subject to regulatory, or recognised self-regulatory, standards.</p> <p>FR (Drafting suggestions):</p> <p>Provided that they contribute financially to the Programme, the Programme may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international</p>

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	<p>agreements or any decisions adopted under the framework of those agreements and applicable to:</p> <p>FR (Comments): It is essential to state more clearly that countries participating in the programme would contribute financially, as provided for in Article 9(1) of the Creative Europe Regulation. The AgoraEU proposal refers to a “fair balance between the contributions of the third country participating in the programmes and the benefits they derive from them,” which is not sufficient.</p>
(a) members of the European Free Trade Association which are members of the European Economic Area, as well as European micro-states;	
(b) acceding countries, candidate countries and potential candidates;	
(c) European Neighbourhood Policy countries;	
(d) other third countries.	<p>DE (Comments): The list under point 1. seems incorrect. The list, specifically point (d), ultimately includes all third countries without specifying any qualitative requirements for these third countries. For comparison, this differs from the current Creative Europe Regulation (see Article 9(1) of Regulation (EU) 2021/818). If such a qualitative restriction of third countries is now waived, the list in points a to c becomes redundant, as all third countries are already covered.</p>

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	AT (Comments): We ask COM for specification on participation of other third countries. Allowing non-EU entities to benefit from EU funding might expose CCS to further market concentration in favour of global giants and thus undermine the cultural sovereignty of the EU.
2. The Association Agreements for participation in the Programmes shall:	
(a) ensure a fair balance as regards the contributions and benefits of the third country participating in the Programmes;	
(b) lay down the conditions of participation in the Union Programme, including the calculation of financial contributions, consisting of an operational contribution and a participation fee, to a programme and its general administrative costs;	
(c) not confer on the third country any decision-making power in the Programme;	
(d) guarantee the rights of the Union to ensure sound financial management and to protect its financial interests;	
(e) where relevant, ensure the protection of security and public order interests of the Union.	

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<p>For the purposes of point (d), the third country shall grant the necessary rights and access required under Regulation (EU, Euratom) 2024/2509 and Regulation (EU, Euratom) No 883/2013, and guarantee that enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU, as well as judgements and orders of the Court of Justice of the European Union, are enforceable.</p>	
<p>3. The association agreements granting participation in the ‘Audiovisual’ specific objective referred to in Article 3 shall take into account the situation of the audiovisual market in the country concerned, including the proximity of their legal framework with the Union audiovisual media acquis and the access to its equivalent support schemes, in particular with regard to other European countries. The agreements concluded with the countries referred to in paragraph 1 (b) shall require the alignment of their national law to Directive 2010/13/EU to grant participation in the ‘Audiovisual’ specific objective.</p>	<p>LV (Comments): In Latvia’s view, the wording has been somewhat weakened compared to the current Creative Europe programme formulations. For example, why is the term 'proximity' used instead of 'alignment with'? Latvia also requests the Commission to clarify what is meant by 'the Union audiovisual media acquis' — does this refer solely to the AVMSD, or does it also include the EMFA and possibly other EU regulations?"</p> <p>IT (Drafting suggestions): 3. The association agreements granting participation in the ‘Audiovisual’ specific objective referred to in Article 3 shall take into account the situation of the audiovisual market in the country concerned, including the proximity of their legal framework with the Union audiovisual media acquis and the access to its equivalent support schemes, in particular with regard to other European countries. The agreements concluded with the countries referred to in paragraph 1 (b) shall require the alignment of their national law to Directive 2010/13/EU to grant participation in the ‘Audiovisual’ specific objective. Association agreements granting participation in the ‘News’ specific objective referred to in Article 3 shall require a demonstrated adherence to policies and practices consistent with the European Union’s media acquis, including Regulation</p>

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	<p>2024/1083/EU. For the countries referred to in paragraph 1 (b), these agreements shall furthermore require the alignment of their national law to the relevant provisions thereof</p> <p>IT (Comments):</p> <p>We highlight the absence of a binding requirement for AVMS alignment for non-candidate third countries, since alignment with the AVMS Directive is required only for “accessing countries, candidate countries and potential candidates”.</p> <p>We therefore request full alignment with the AVMS acquis for all types of third countries associated.</p> <p>To complement this provision we have also suggested to strenghten the wording in recital 38 to ensure that alignment with the AVMS Directive will be duly taken into consideration when concluding association agreements. This amendment concerning “News” ensures third countries participating in the 'News' objective uphold EU values of media freedom and pluralism. By requiring adherence to the EU media acquis, including the European Media Freedom Act, we guarantee consistent standards for content and editorial independence, thereby preventing regulatory asymmetry.</p> <p>FR (Drafting suggestions):</p> <p>The association agreements granting participation in the ‘Audiovisual’ specific objective referred to in Article 3 shall take into account the situation of the audiovisual market in the country concerned, including the proximity of their legal framework with the Union audiovisual media acquis and the access to its equivalent support schemes, in particular with regard to other European countries. The agreements concluded with the countries referred to in paragraph 1 (b) to (d) shall require the alignment of their national law to</p>

Commission proposal	Drafting suggestions and Comments
	<p>Directive 2010/13/EU to grant participation in the ‘Audiovisual’ specific objective.</p> <p>FR (Comments): The French authorities express their serious concerns about the terms of association planned for third countries. Unlike the current Creative Europe regulation, only candidate countries and potential candidates would be required to align their national law with the Audiovisual Media Services Directive (Directive 2010/13/EU) in order to participate in the “audiovisual” sub-strand of the MEDIA+ programme. Compliance with EU rules, in particular the obligations arising from the AVMS Directive, must be one of the prerequisites for receiving this funding, as is currently the case for all countries eligible for association with the Creative Europe programme (points (a) to (d) of Article 14(1)). The absence of such a conditional provision could create a distortion in favor of project promoters located in the EU compared to those located outside the EU</p> <p>AT (Drafting suggestions): 3. The association agreements granting participation in the ‘Audiovisual’ specific objective referred to in Article 3 shall take into account the situation of the audiovisual market in the country concerned, including the proximity of their legal framework with the Union audiovisual media acquis and the access to its equivalent support schemes, in particular with regard to other European countries. The agreements concluded with the countries referred to in paragraph 1 (b) shall require the alignment of their national law to Directive 2010/13/EU to grant participation in the ‘Audiovisual’ specific objective <u>of the MEDIA+ strand</u>.</p> <p>AT</p>

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Deadline: 11 December 2025 (18:00)

Updated: 12/12/2025 09:56

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Explicit mention of MEDIA.</p> <p>NL</p> <p>(Comments):</p> <p>This article emphasises the need and urgency to create earmarked, transparent and separate budgets for the ‘Audiovisual’ specific and the ‘News’ specific objectives within the Media Plus strand, as the Netherlands stressed above in the Articles 5 and 6.</p>
<p><i>Article 15</i></p>	<p>PL</p> <p>(Comments):</p> <p>The future role and functions of national contact points (NCPs) are not clearly defined in the document. Given that NCPs have so far played an essential role in informing applicants, providing guidance on proposal preparation and contributing to the dissemination of programmes at national level, it is necessary that the European Commission clearly outlines their place and functions within the new Programme. This would ensure a smooth transition, continuity, and effective implementation of the Programme in the Member States. At the same time, we would recommend maintaining separate contact points for programme areas regarding culture+media and CERV, who, based on their competence and expertise, could best assist potential program applicants. Furthermore, it is important that the financial resources allocated to Programme are not reduced. Unless we know how management, division of work and responsibilities are defined, we will not be able to help the Desks to operate more efficiently and provide better support to applicants.</p>

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Commission proposal	Drafting suggestions and Comments
<i>Implementation and forms of Union funding</i>	
<p>1. The Programme shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with entities referred to in Article 62(1), point (c) of that Regulation.</p>	<p>BE (Comments): Can COM provide us with some additional information on which actions of the programme will be implemented directly and which indirectly (and by whom)?</p>
<p>1. Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement and non-financial donations.</p>	<p>DE (Comments): Numeration: point 1. is here followed by another point 1.</p>
<p>2. [Where Union support is provided in the form of a budgetary guarantee or a financial instrument, including where combined with non-repayable support in a blending operation, it shall be exclusively provided through the ECF InvestEU Instrument and implemented in accordance with the applicable rules of the ECF InvestEU Instrument through agreements concluded for that type of support under the ECF InvestEU Instrument.]</p>	
<p>3. [Union support in the form of a budgetary guarantee shall be provided within the maximum amount of the budgetary guarantee established by the ECF Regulation.]</p>	
<p>4. [Where the Programme makes use of the ECF InvestEU Instrument, it shall provide the provisioning for the budgetary guarantee and the financing to</p>	

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financial instruments, including when combined with non-repayable support in the form of a blending operation.]	
5. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to costs or, where necessary, simplified cost options, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise.	
	<p>SI (Drafting suggestions): Add §5a: “The Commission shall apply simplified cost options and provide advance payments up to 80 % for projects under EUR 60 000.”</p> <p>SI (Comments): This codifies the Commission’s own simplification commitment from the Explanatory Memorandum (“simplified forms of funding will become the standard”) and mirrors Article 125 of the <i>Financial Regulation 2024/2509</i> on proportionate control and simplified cost options. Advance payments up to 80 % remove liquidity barriers for micro-projects, enabling equitable participation of small CSOs and municipalities without additional administrative burden or budgetary impact</p>
6. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may be composed partially or fully of independent external experts.	<p>BE (Drafting suggestions): <u>For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may be composed partially or fully of independent external experts [External experts shall have a professional background related to the field assessed and, where relevant, knowledge of the geographical area concerned by the application.]</u></p>

Commission proposal	Drafting suggestions and Comments
	<p>BE (Comments): It should be added that experts must have professional experience in the field being assessed. (as mentioned in the current Creative Europe program)</p>
<p>7. Entities applying for a funding under the Creative Europe - Culture strand of the Programme that have received over 50% of their annual revenue from public sources over the last two years, shall be considered as having the necessary financial, professional and administrative capacity to carry out activities under the Programme. They shall not be required to present further documentation to demonstrate that capacity.</p>	<p>IT (Comments): While we understand the need to simplify procedures to favour participation, we underline that this might generate risks, (in particular in case of bankruptcy of one partner), with financial impact on other partner organizations. Possible solutions might be envisaged (i.e. to require applicants—entities/associations to provide a declaration from their legal representative that they are not in bankruptcy, compulsory liquidation, or composition with creditors, or in any situation indicating insolvency or cessation of business). Such a requirement would certainly not complicate the procedures, but it would require greater responsibility on the part of the applicants.</p> <p>HR (Drafting suggestions): Entities applying for a funding within under the Creative Europe - Culture strand of the Programme that have received over 50% of their annual revenue from public sources over the last two years, shall be considered as having the necessary financial, professional and administrative capacity to carry out activities under the Programme. They shall not be required to present further documentation to demonstrate that capacity.</p> <p>HR (Comments):</p>

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	<p>We propose this measure is applicable for all applicants within the Programme firstly, to ensure equality and additionally for further flexibility of the application process and the access to the EU funding</p> <p>DE (Comments): Why is this paragraph not in brackets?</p> <p>BE (Comments): Why is only the Creative Europe – Culture strand mentioned in this paragraph?</p>
<p><i>Article 16</i></p>	<p>DE (Comments):</p> <p>The combination of culture and media on the one hand and CERV on the other creates the risk that funding will be tied to a specific content orientation of media and cultural offerings. However, it is not the role of the media to "educate" the public in a particular way, regardless of how worthwhile the pursued goals may be. Against this backdrop, Article 16 should include a provision, at least for the media sector, stipulating that specific funding criteria may not be linked to content requirements.</p>

<p><i>Eligibility</i></p>	<p>BE (Comments): As already mentioned in our comment on article 2, we believe it is important that the target groups and sectors are clearly defined in the regulation.</p> <p>HU (Comments): Regarding eligibility, we would like to highlight a possible conflict of interest situation. In our experience, those CSOs that receive funding from the current CERV and would likely to be eligible for funding from the AgoraEU under specific objectives related to the promotion of rule of law are the same as those which usually provide information and contributions to the Commission to be used as sources of the rule of law reports. We are wondering whether these circumstances may lead to the risk of conflict of interests in the context of the new MFF package, where the Commission proposed to create a link between rule of law reports and access to EU funds. Based on the Commission proposal for a Regulation establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509 (NRPP Proposal), the Commission could propose to suspend payments if rule of law recommendations are not followed-up by the Member State sufficiently, which could lead to a final loss of the Union contribution of a Member State. The NRPP proposal also sets out the possibility to channel the amounts thus decommitted from a Member State’s allocation to other programmes implemented under direct or indirect management, in particular those contributing to supporting Europe’s democracy, civil society, Union values or the fight against corruption. In the presentations of the MFF package, the Commission named specifically the AgoraEU programme as a possible (and most likely) beneficiary of these decommitted funds. These additional revenues in the AgoraEU’s budget then could be used to finance the same range of CSOs as mentioned above, which could thus be incentivised to influence the Commission’ reporting and assessment on rule of</p>
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	<p>law compliance in a way that could lead to the transfer of EU funds from the MS's allocation under the Single Fund to the AgoraEU's budget. Neither in the ad-hoc working party on MFF, nor in the CAC or any other fora we have received so far any response on the question how and where the Commission intends to address this potential conflict of interests situations.</p>
<p>1. Eligibility criteria shall be set to support achievement of the objectives laid down in Article 3, in accordance with Regulation (EU, Euratom) 2024/2509 and shall apply to all award procedures under the Programme.</p>	
<p>2. In award procedures under direct and indirect management, one or more of the following legal entities may be eligible to provide or receive Union support:</p>	<p>IT (Comments): Companies that alternatively:- are established abroad or controlled by non-EU companies - do not abide by AVMS rules should not be eligible to Media+ production funds. There is a risk of excessive discretion regarding the eligibility of entities established in non-associated third countries</p>
<p>(a) entities established in a Member States;</p>	<p>DE (Comments): According to recital 37, establishments in overseas territories of Member States are also permitted. The previous Creative Europe Regulation (Regulation 2021/818) also explicitly lists them.</p>
<p>(b) entities established in an associated third country;</p>	<p>SK (Comments): The text allows their involvement, but in practice it is often problematic to align their own internal rules with EU rules. It is necessary to think about prior verification of procurement and financial processes to avoid conflict of rules.</p>

Commission proposal	Drafting suggestions and Comments
	Usually, complicated administrative processes discourage applicants from involving organizations from third countries in their projects.
(c) international organisations;	
(d) other entities established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives laid down in Article 3.	<p>IT (Drafting suggestions):</p> <p>(d) other entities established in non-associated third countries where the funding of such entities is strictly necessary for implementing to achieve the objectives of a the given action and contributes to the objectives laid down in Article 3. Such entities shall, in principle, bear the cost of their participation.</p> <p>IT (Comments):</p> <p>This wording is risky and uncertain because an entity established in a non-associated third country could be eligible for MEDIA+ funding. This approach differs from that of Creative Europe (Article 17), which provides for a much more limited opening, restricted to cases where participation is strictly necessary to achieve the “objectives of a given action”, and where such entities “shall, in principle, bear the cost of their participation”</p> <p>This point require clarification particularly regarding the interpretation of “entities essential for implementing the action” and the assessment criteria for their contribution to the programme’s objectives.</p> <p>FR (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>d) by way of exception and provided that their country is listed in the work programme, other entities active in the cultural and creative sectors established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives laid down in Article 3. These entities shall in principle bear the cost of their participation.</p> <p>FR (Comments): The French authorities express their serious concerns about the substantial changes in eligibility for entities established in third countries not associated with the program: previously, the Creative Europe Regulation indicated that the countries of establishment of these entities had to be mentioned in the work programme (and therefore be subject to approval by programme committee), but also that these entities had to bear the cost of their participation. However, the draft regulation does not include either of these two conditions, which must be reinstated.</p>
<p>3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 14(1) of this Regulation may, where relevant, participate in and benefit from any procurement mechanisms set out in Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States shall be applied, mutatis mutandis, to participating associated third countries.</p>	<p>FR (Drafting suggestions): 3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 14(1) of this Regulation may, where relevant, participate in and benefit from any procurement mechanisms set out in Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, provided that a reciprocity clause is foreseen in the Association Agreement. Rules applicable to Member States shall be applied, mutatis mutandis, to participating associated third countries.</p> <p>FR (Comments):</p>

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	<p>This paragraph entitles enterprises from third countries associated to the programme to participate in any procurement mechanism set out in Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. It would be preferable to add a compulsory reciprocity clause in Association Agreement.</p>
<p>4. Award procedures affecting security or public order, in particular concerning strategic assets and interests of the Union or its Member States, shall be restricted in accordance with Article 136 of Regulation (EU, Euratom) 2024/2509.</p>	
<p>5. The work programme referred to in Article 110 of Regulation (EU, Euratom) 2024/2509 may further specify the eligibility criteria set out in this Regulation or set additional eligibility criteria for specific actions.</p>	<p>PL (Drafting suggestions): The work programme referred to in Article 110 of Regulation (EU, Euratom) 2024/2509 may further specify the eligibility criteria set out in this Regulation or set additional eligibility criteria for specific actions, with particular attention to works produced by European independent production companies.</p> <p>PL (Comments): This provision aims to strengthen the role of independent European production companies as key drivers of creativity, innovation and cultural diversity in the audiovisual sector.</p> <p>HR (Comments): To ensure transparency, we believe that it would be important that any major change or specification of the eligibility criteria within the Work programme should be consulted and approved by the future Programme Committee</p> <p>NL</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>The work programme referred to in Article 110 of Regulation (EU, Euratom) 2024/2509 may further specify the eligibility criteria set out in this Regulation or set additional eligibility criteria for specific actions. This does not preclude the possibility of using two-stage calls for applicant proposals.</p> <p>NL (Comments):</p> <p>NL requests assurances that so-called two-stage calls remains a possibility within the work programmes and calls for proposals. Stakeholders in the CERV+ programme favour greater use of two-stage calls, <i>whereby applicants may first submit a short concept note prior to being invited to submit a full application.</i> In this approach, a call has two deadlines: first, applicants submit a short concept note, and only those positively assessed are invited to submit a full application. They note that single-stage calls can be burdensome, as preparing a complete proposal requires significant effort. Two-stage calls reduce unnecessary workload, allowing applicants to submit an initial proposal without incurring the full costs of a detailed application that may have little chance of success</p>
<p>6. An operating grant may be awarded without a call for proposals to the European Network of National Equality Bodies (Equinet), to cover expenditure associated with the permanent work programme of Equinet.</p>	<p>NL (Drafting suggestions):</p> <p>NEW - Article 16 bis</p> <p>Eligible actions supported by the Programme</p> <p>The general and specific objectives of the Programme shall be pursued in particular by supporting the following activities:</p>

Commission proposal	Drafting suggestions and Comments
	<p>(a) supporting civil society organisations and non-profit stakeholders active in the areas covered by the Programme to carry out advocacy activities, strategic litigation, campaigning, communication and watchdog activities, to promote rights, thereby also strengthening the protection and promotion of Union values and respect for the rule of law, and contributing to democratic dialogue, transparency and good governance, including in cases of shrinking space for civil society.</p> <p>NL (Comments): Similarly to the current CERV’s Regulation, this amendment specifies eligible activities, ensuring clarity and consistency in the implementation of the Programme. By explicitly including support for advocacy activities, strategic litigation, campaigning, communication and watchdog activities, the Programme strengthens the role of civil society in promoting Union values and addressing shrinking civic space. This approach reflects best practice from the current CERV programme, supports sustainability of grassroots actors, and guarantees the effective participation of under-represented and marginalised groups in democratic life.</p>
<i>Article 17</i>	

Commission proposal	Drafting suggestions and Comments
<p><i>Work programme</i></p>	<p>LV (Comments): It is important for Latvia that Member States are involved in the development of the annual work programmes and that the current committee procedure is maintained. Latvia also wishes to understand whether a single joint Work Programme is planned, or if each strand will have its own separate annual work programme. Lastly, how will the Commission promote geographical balance?</p>
<p>The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. The work programmes shall set out, where applicable, the activities and related amounts of Union support to be implemented through the ECF InvestEU instrument.</p>	<p>LV (Drafting suggestions): 1. The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. The work programmes shall set out, where applicable, the activities and related amounts of Union support to be implemented through the ECF InvestEU instrument.</p> <p>LV (Comments): Latvia seeks clarification on how to interpret the final sentence of this article — does it imply that the types of projects to be supported and the amount of funding from the European Competitiveness Fund will be pre-defined in the Work Programmes?</p> <p>IT (Comments): The Programme Committees should be re-integrated their presence plays an important role in ensuring that national governments have adequate oversight of the annual work programmes defined by the Commission, as well as in encouraging the inclusion of new emerging themes during the programming period</p> <p>IE</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Ireland would welcome clarity on the implementation and governance structures, and the role of Member States in this regard. This includes information on the development and planned frequency of Work Programmes and if a structure such as Programme Committees will remain in place. Further clarity is also needed on the proposed monitoring and evaluation of the programme as well as action under each strand of the programme</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. The work programmes shall set out, where applicable, the activities and related amounts of Union support to be implemented through the instrument.</p> <p>HR</p> <p>(Comments):</p> <p>We believe that the work programme should define type or list of activities and amounts within the instrument.</p> <p>FR</p> <p>(Drafting suggestions):</p> <ol style="list-style-type: none"> 1. The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. The work programmes shall set out, where applicable, the activities and related amounts of Union support to be implemented through the ECF InvestEU instrument. 2. The Commission shall be assisted by a committee (the ‘AgoraEU Committee’). That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.

Commission proposal	Drafting suggestions and Comments
	<p>3. The Commission shall adopt annual work programmes by means of implementing acts. Those implementing acts shall be adopted in accordance with the examination procedure referred to in article 5 of Regulation 182/2011.</p> <p>4. The AgoraEU Committee can meet in specific configurations to address issues relating to the different strands of the Programme. The Commission shall consult the Committee when developing support mechanisms and implementation modalities for the various components of the Programme.</p> <p>4. The Commission shall submit the draft work programmes to the AgoraEU Committee within a timeframe and in a format that allow the Committee to deliver an informed opinion before their adoption.</p> <p>5. The Commission shall ensure the monitoring and evaluation of the Programme based on qualitative and quantitative indicators measuring progress towards its objectives. The data collected shall be made available to the AgoraEU Committee. On the basis of these indicators and in consultation with relevant stakeholders, the Commission shall carry out interim and ex post evaluations of the Programme. The conclusions of these evaluations shall be communicated annually to the AgoraEU Committee, as well as to the European Parliament and to the Council</p> <p>FR (Comments):</p> <p>The French authorities consider that the current proposal is incomplete with regard to the governance and evaluation of the programme.</p>

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	<p>A programme committee, composed of representatives of the Member States, should be set up within AgoraEU, as is currently the case in the Creative Europe programme. In view of the extension of the scope of the AgoraEU programme, this committee must provide specific meeting formats in order to be able to deal with specific issues relating to each component of the program. This committee must be consulted when developing support mechanisms for the various components of the programme.</p> <p>Work programmes must be submitted to this committee, along with the actions they envisage and the amounts allocated, in a format and within a timeframe that allows the committee to issue an opinion on the programme, based on the review procedure currently provided for in Regulation 182/2011, i.e., a binding opinion of the Commission adopted by a qualified majority. Work programmes should also include an indicative implementation schedule.</p> <p>Finally, the current proposal does not include any provisions for the evaluation, monitoring, and control of the programme, which are essential for measuring its effectiveness. The French delegation will request that indicators be put in place to measure the progress of the programme and the achievement of its objectives, and that this data be made available to the committee. On the basis of this data and consultations with the parties, the Commission will have to carry out evaluations of the programme's implementation, as is currently provided for in Creative Europe, the conclusions of which should be communicated to the programme committee as well as to Parliament and the Council.</p> <p>DE (Comments):</p> <p>It is important that MS play a sufficient role regarding the implementation of the Programme. This, however, is a horizontal question affecting several</p>

Commission proposal	Drafting suggestions and Comments
	<p>programmes under the MFF proposal, hence, this question should be dealt with in the horizontal AHWP MFF.</p> <p>Comprehension question: Could COM elaborate on the relationship between AgoraEU and the ECF InvestEU?</p> <p>BE (Drafting suggestions):</p> <p>Addition to article 17: Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 17bis.</p> <p>+ New article 17bis:</p> <p style="text-align: center;"><i>Committee procedure</i></p> <p>The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</p> <p>The committee shall meet in specific configurations to deal with sectoral issues. Where appropriate, in accordance with its rules of procedure and on an ad hoc basis, external experts, including representatives of the social partners, may be invited to participate in its meetings as observers.</p> <p>Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</p> <p>BE (Comments):</p> <p>The work programme is not only the financing decision. It also describes the implementation of political strategies in areas which, in relation to the scope</p>

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	<p>of this programme, fall largely within the competence/implementation area of the Member States. It is therefore extremely important that the Member States and their sectoral experts can also be involved in the implementation of the programme through a specific programme committee. We therefore propose that a corresponding article be included in the regulatory proposal.</p> <p>This new article 17bis could read like this: See column “Drafting suggestions”</p> <p>Would it be an annual workprogramme?</p> <p>What is the link between ECF Invest EU and AgoraEU?</p> <p>AT (Drafting suggestions):</p> <p>The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. The work programmes shall set out, where applicable, the activities, <u>including objectives, indicative budget and timetable</u>, and related amounts of Union support to be implemented through the ECF InvestEU instrument.</p> <p>AT (Comments):</p> <p>The work programmes must define actions, including objectives, indicative budget and timetable. Add references to the comitology procedure by a Programme Committee and adoption of the work programmes (as in the current Regulation). AT supports the text proposal of the DK Presidency to add the corresponding article on Committee procedure!</p> <p>HU (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p><u>1) The Programme shall be implemented by work programmes referred to in Article 110 Regulation (EU, Euratom) 2024/2509. The work programmes shall give an indication of the amount allocated annually to each specific objective and action as well as horizontal priority, and set out, where applicable, the activities and related amounts of Union support to be implemented through the ECF InvestEU instrument. Work programmes shall also contain an indicative timetable for implementation.</u></p> <p><u>new paragraph (2) The work programme shall be adopted by the Commission by means of an implementing act. That implementing act shall be adopted in accordance with the examination procedure referred to in Article [...].</u></p> <p><u>New Article</u></p> <p><u>Committee procedure</u></p> <p><u>1. The Commission shall be assisted by a committee ([AgoraEU] Committee). That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</u></p> <p><u>2. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</u></p> <p><u>3. The [AgoraEU] Committee may meet in specific configurations to deal with concrete issues relating to the individual strands and specific objectives of the Programme.</u></p> <p>HU (Comments):</p> <p>Member States’ role in the procedure should be ensured by (re)inserting the requirement to conduct a comitology procedure, and specifically examination procedure, as it is the case during the current programming period. This is all the more crucial given the increased flexibility and discretion given to the Commission, pursuant to the proposal, in deciding on important issues related to the use of the AgoraEU programme (e.g. specific actions amenable</p>

Commission proposal	Drafting suggestions and Comments
	<p>to support, use and financing of horizontal priorities, allocation of resources between strands and objective, etc).</p> <p>We consider it essential that the programme committee(s) be maintained — and thus Member State participation in the governance of the programme be ensured — also in the next programming period. For these reasons, we propose that the role of the programme committee(s) be explicitly confirmed with regard to the adoption of the work programme.</p> <p>In view of the administrative burden associated with the annual work programmes, the carry-over of commitments affecting the programmes, and the need for professional predictability, we have a preference to relying on biennial work programmes. However, within the biennial work programmes, we suggest to break down the support annually and to indicate amounts allocated to each objective or action.</p> <p>NL (Drafting suggestions):</p> <p>NEW: 17a. The Commission shall ensure coherence and complementarity between the Justice and AgoraEU Programmes in the field of protecting persons engaging in public participation from SLAPPs.</p> <p>Joint award procedures, sequential calls for proposals or coordinated annual work programme actions may be established where appropriate.</p> <p>The annual work programmes shall include information on cross-programme activities supporting the implementation of Directive (EU) 2024/1069 and Commission Recommendation (EU) 2022/758.”</p> <p>The Programme shall have the possibility of using two-stage calls for applicant proposals.</p> <p>NEW: 18. Committee procedure</p>

Commission proposal	Drafting suggestions and Comments
	<p><u>The Commission shall be assisted by a committee (the ‘AgoraEU Committee’). That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</u> <u>Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</u> <u>The AgoraEU Committee may meet in specific configurations to deal with concrete issues relating to the individual strands of the Programme.</u></p> <p>NL (Comments):</p> <p>NL requests adding a new article adressing coordination with Justice Programme. NL is open to a more suitable exact location of this article if needed.</p> <p>The proposed amendment mirror coordination models already applied in previous multiannual programmes (such as Justice and Rights, Equality and Citizenship 2014-2020) and are fully compatible with the current Financial Regulation, which already allows for joint or coordinated award procedures. The proposed horizontal coordination mechanism requires no new funding and introduces no new structures. It ensures visibility and clarity for applicants, strengthens coordination, reduces administrative overlap, and ensures that EU resources target distinct but complementary actors - the judiciary and civil society.</p> <p>The benefits include comprehensive implementation of EU framework against SLAPPs across the judicial and societal spectrum, avoidance of duplication and ensuring efficient use of EU funds, enhanced monitoring through aligned performance indicators, improved visibility of EU support for democratic resilience, and equal access to EU protection across all Member States, regardless of administrative capacity.</p>

Commission proposal	Drafting suggestions and Comments
	<p>Under this arrangement both programmes will effectively contribute to the shared EU objective of protecting freedom of expression and public participation from SLAPPs.</p> <p>NL requests assurances that so-called two-stage calls remains a possibility within the work programmes and calls for proposals. Stakeholders in the CERV+ programme favour greater use of two-stage calls, whereby applicants may first submit a short concept note prior to being invited to submit a full application. In this approach, a call has two deadlines: first, applicants submit a short concept note, and only those positively assessed are invited to submit a full application. They note that single-stage calls can be burdensome, as preparing a complete proposal requires significant effort. Two-stage calls reduce unnecessary workload, allowing applicants to submit an initial proposal without incurring the full costs of a detailed application that may have little chance of success</p> <p>NL request the continuation of the Program Committees in their current form to ensure involvement of the member states in the execution of the program.</p> <p>SK (Comments): SK is in favour of having Member States involved via a programme committee, when adopting the work programme, to ensure good governance of the programme.</p> <p>Member States should also be consulted when preparing work programmes to have an overview of the budget allocations and results achieved.</p> <p>SI (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p>The Programme shall be implemented by biennial work programmes referred to in Article 110 of Regulation (EU, Euratom) 2024/2509, prepared in consultation with Programme Committees and the Civil Dialogue Group.</p> <p>SI (Comments):</p> <p>Anchoring biennial work programmes in the operative text delivers predictability for beneficiaries and synchronises funding with multi-year policy cycles, as encouraged in the Better Regulation Guidelines (SWD (2021) 305). The reference to Article 110 of the Financial Regulation 2024/2509 ensures legal accuracy for implementing acts, while explicit consultation with Programme Committees and the Civil Dialogue Group fulfils the principle of participatory governance under Article 11 TEU.</p>
	<p>LV (Drafting suggestions):</p> <p><u>2. The Commission shall adopt work programmes by means of implementing acts. Those implementing acts shall be adopted in accordance with the examination procedure referred to in [new article].</u></p> <p>LV (Comments):</p> <p>Latvia supports the Presidency drafting proposal.</p>
Chapter VII	
Final provisions	

Commission proposal	Drafting suggestions and Comments
<i>Article 18</i>	
<i>Repeal</i>	
Regulations (EU) 2021/692 and (EU) 2021/818 are repealed with effect from 1 January 2028.	
	<p>LV (Drafting suggestions):</p> <p style="text-align: center;"><u>(new article)</u></p> <p style="text-align: center;"><u>Committee procedure</u></p> <p><u>1. The Commission shall be assisted by a committee (the ‘AgoraEU Committee’). That committee shall be a committee within the meaning of Regulation (EU) No 182/2011</u></p> <p><u>2. The committee may meet in specific configurations to deal with concrete issues relating to the individual strands of the Programme.</u></p> <p><u>3. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</u></p> <p>LV (Comments):</p> <p>Latvia supports the Presidency drafting proposal. We reiterate that involving Member States in the practical implementation of the programme is crucial.</p>

AgoraEU proposal – template for the fifth consultation

From: RO, PL, LV, IT, IE, HR, FR, FI, EL, DE, CZ, BE, AT, HU, NL, SK, SI

Deadline: 11 December 2025 (18:00)

Updated: 12/12/2025 09:56

Commission proposal	Drafting suggestions and Comments
<i>Article 19</i>	
<i>Transitional provisions</i>	
<p>1. This Regulation shall not affect the continuation or modification of the actions concerned, until their closure, under Regulations (EU) 2021/692 and (EU) 2021/818 , which shall continue to apply to the actions concerned until their closure.</p>	
<p>2. The financial envelope for the Programme may also cover technical and administrative assistance expenses necessary to ensure the transition between the Programme and the measures adopted under Regulations (EU) 2021/692 and (EU) 2021/81.</p>	
	<p>SI (Drafting suggestions): Add § 3: “Ongoing actions under Regulations (EU) 2021/692 and 2021/818 shall continue to receive support until their completion.”</p> <p>SI (Comments): This addition ensures legal and financial continuity and prevents funding gaps and administrative disruptions for beneficiaries of the ongoing CERV and Creative Europe programmes, securing a smooth transition to the new AgoraEU framework.</p>

AgoraEU proposal – template for the fifth consultation

From: RO, PL, LV, IT, IE, HR, FR, FI, EL, DE, CZ, BE, AT, HU, NL, SK, SI

Deadline: *11 December 2025 (18:00)*

Updated: 12/12/2025 09:56

Commission proposal	Drafting suggestions and Comments
<i>Article 20</i>	
<i>Entry into force and application</i>	
This Regulation shall enter into force on the twentieth day following that of its publication in the <i>Official Journal of the European Union</i> .	
It shall apply from 1 January 2028.	
This Regulation shall be binding in its entirety and directly applicable in all Member States.	
Done at Brussels,	
<i>For the European Parliament</i> <i>For the Council</i>	
<i>The President</i> <i>The President</i>	

AgoraEU proposal – template for the fifth consultation

From: RO, PL, LV, IT, IE, HR, FR, FI, EL, DE, CZ, BE, AT, HU, NL, SK, SI

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