

## **Article 17 (TFEU) Dialogue Seminar**

**“Beyond the numbers: the contribution of Article 17 TFEU to an EU Multiannual Financial Framework grounded in ethics, solidarity and inclusion ”**

**Tuesday, 2 December 2025, from 15.00 to 18.00**

**European Parliament (Brussels) Spinelli 1E2**

**Dear Vice President Antonella Sberna, Honourable Members of the European Parliament, dear colleagues and friends,**

It is a pleasure and a responsibility for me, as Secretary General of the Commission of the Bishops’ Conferences of the European Union, to contribute to this Article 17 dialogue on the future Multiannual Financial Framework. COMECE welcomes this opportunity for an open exchange between institutions and Churches on the values that guide our common European project.

The Commission’s proposal for the MFF 2028–2034 is ambitious in structure, yet insufficient in volume and risky in several of its implications. It is ambitious because it reshapes the architecture of EU funding mainly around a single National Reform and Prosperity Plan. But unless the financial envelope is strengthened with new own resources, the Union will struggle to repay common debt while also responding to geopolitical instability, ecological transition and social needs. Without new revenues, social and ecological priorities risk becoming the first casualties.

Greater flexibility compared to previous MFFs is welcome, as rigidity once limited the Union’s ability to react to crises. But flexibility without safeguards can allow governments to redirect resources away from long-term social and ecological commitments. It may also encourage a “tick-the-box” logic focused on fast absorption instead of real transformation. Flexibility must therefore be matched with transparent governance, predictable earmarking and strong accountability – otherwise it becomes a liability for the weakest actors and the most vulnerable communities.

In the field of Fundamental Rights, our main reference is the AgoraEU Programme, especially its CERV+ strand. COMECE strongly supports initiatives promoting equality

and combating discrimination on all grounds recognised in the Treaties. Yet the current wording of Recital 15 and Article 7(a) omits explicit reference to hatred and discrimination against Christians. Anti-Christian incidents continue to rise in several Member States. Faith communities should not be invisible in European anti-discrimination policy. We therefore propose adding explicit references to anti-Christian hatred, alongside antisemitism and anti-Muslim hatred. This is a matter of equal treatment, not privilege.

We also stress that equality funding should not be used to advance ideological agendas that interfere with national identities or competences. At the same time, we welcome EU support for child protection, privacy and data protection, civic space, and the fight against disinformation. These fields are increasingly relevant to the work of Churches and faith-based organisations, which contribute daily to resilient, well-informed and socially cohesive communities.

A major concern for COMECE is the dilution of social priorities in the new mega-fund architecture. The European Social Fund Plus – for decades the main European instrument for fighting poverty, supporting youth and migrants, and accompanying the most vulnerable – becomes almost invisible. Reduced to a small component inside national plans designed exclusively by governments, social investment risks being optional rather than structurally protected. This threatens the work of Caritas, diocesan initiatives, Catholic social services, education and formation centres, and many others operating close to those most in need. Their access to funding risks becoming more fragile and dependent on shifting political priorities.

The move from several EU programmes to one single NRPP also centralises power in national governments. Civil society, Churches, regional authorities and social partners are not guaranteed inclusion, and Parliament's influence is weakened. Yet past experience clearly shows that partnership principles ensure transparency and effectiveness. They should not be optional.

More broadly, when all priorities – social, agricultural, infrastructure, education and youth – are placed in one competing basket, actors with weaker political leverage usually lose out. This is a real risk for vulnerable and marginalised communities.

COMECE supports efforts to strengthen Europe's defence capabilities, but defence must remain at the service of peace, human dignity and the protection of life. Weapons are not ordinary goods. Ethical and legal safeguards – including parliamentary scrutiny – must remain robust, especially concerning emerging technologies and autonomous systems. Debt-driven defence spending also poses fiscal risks that could undermine long-term social and development commitments.

In external action, the merger of instruments under the new Global Europe structure raises concerns about the diversion of funds from the eradication of poverty – a Treaty obligation – toward short-term geopolitical aims. Investment tools are important, but they cannot replace grant-based support for basic services, humanitarian needs or good governance, especially in fragile contexts. Clear spending targets are needed to prevent the politicisation of aid.

On Migration and Asylum, the proposal focuses primarily on border management, returns and digitalised control. Security matters, but integration and cohesion must not be neglected. Local actors – including Churches – play an essential role in reception and community-building. They must have effective and fair access to EU funding, free from political bias.

COMECE welcomes the decision to maintain Horizon Europe and Erasmus+ as stand-alone programmes. They remain strategic investments in Europe's future and are among the clearest expressions of what unites Europeans. At the same time, embedding health within the new European Competitiveness Fund risks subordinating public health to industrial goals. Health must retain its strategic independence.

Culture and youth programmes remain underfunded relative to the ambitions of the Treaties, and administrative barriers continue to burden small organisations, including many Church-based actors. Streamlined rules and dedicated budget lines are necessary.

Agriculture and sustainability also lose structural autonomy under the new MFF. CAP faces significant real-term cuts, and rural development becomes absorbed into NRPPs without previous guarantees. Eliminating dedicated environmental funds such as LIFE forces climate and biodiversity objectives to compete with politically dominant

priorities. Yet ecological transition requires predictability and long-term investment, not short-term milestones.

Allow me to conclude with some proposals for the negotiations ahead:

1. Guarantee effective, non-discriminatory access to EU funding for grassroots actors, including Churches and faith-based organisations.
2. Explicitly recognise these actors as partners in the Regulation for cohesion, agriculture and rural development.
3. Strengthen governance of NRPPs through mandatory participation of civil society, regions, social actors and faith-based organisations.
4. Ensure transparent national envelopes for social, rural and ecological objectives, with clear tracking and independent monitoring.
5. Preserve dedicated funding windows for social inclusion and community-based initiatives targeting poverty, homelessness, children, migrants and marginalised groups.
6. Introduce targeted CAP measures supporting small farms, agro-ecology and generational renewal.

### **Honourable Members,**

Europe's budget is not merely a financial instrument; it is a moral statement. It expresses what we value, whom we prioritise, and how we understand human dignity and solidarity. In this spirit, COMECE stands ready to continue this dialogue, convinced that the European project is, at its heart, a community of peoples who do not abandon one another – especially not the most vulnerable.

**Thank you!**