

## Response to the EACEA Review Report and Review Letter

*Project: 101161785 — YA 2024*

World Youth Alliance Southeast Europe (WYA SEE or SSM JIE) submits this response to the Specific Issues Review Report and Review Letter concerning the operating grant “Youth Act 2024” (Project 101161785). We remain fully committed to complying with the Grant Agreement, with the Erasmus+ Regulation, and with the values referred to in Article 2 TEU and the Charter of Fundamental Rights.

### Executive Summary

The EACEA Review Report largely evaluates Youth Act 2024 not on the basis of the activities and deliverables described in Annex 1 and implemented in 2024, but on the basis of World Youth Alliance’s broader positions and activities, including its Charter and white papers, and by reference to non-binding political documents such as European Parliament resolutions and Commission communications, which the Review itself describes as a “reference frame of guidance beyond the general framework of the TFEU, the EU Financial Regulation and the grant agreements themselves”.

Our response has three main aims: to show that the concrete activities and deliverables under Youth Act 2024 are in line with the Grant Agreement, to clarify our methodological and scientific approach where the Review infers “one sidedness” or “disinformation”, and to explain why disagreement with non-binding political resolutions or strategies cannot in itself constitute a breach of Article 14 of the Grant Agreement.

### Scope of the grant and nature of the review

Youth Act 2024 is an operating grant that supports the functioning and annual work programme of SSM JIE. The Grant Agreement expressly states that operating grants are a financial contribution to the work programme of the beneficiary.

The project description and Annex 1 make clear that the purpose of the grant is to empower young people, promote their participation in democratic life, foster social inclusion, build skills through non formal education, and promote human dignity and human rights among youth in Europe through more than 30 activities in 2024.

The Review acknowledges that the activities set out in the proposal are in line with the call and that more than 30 activities took place, reaching around 60 000 young people as indirect participants.

It also recognises that many aspects of the work programme, including mental health education, digital literacy, critical thinking training, volunteering, intercultural learning and youth employability, are neutral and unobjectionable, and in several cases explicitly relevant and appropriate.

However, when it comes to “compliance” the Review largely shifts focus away from the concrete 2024 activities and deliverables and toward:

- WYA’s Charter and mission statements,
- WYA’s white papers on gender, HIV/AIDS and sexuality education, and
- WYA SEE’s posts and content on social media.

It then measures these broader positions against a “reference frame” composed of several European Parliament resolutions (on SRHR, LGBTIQ rights and HIV/AIDS) and Commission strategies (for example on LGBTIQ equality, including CSE), which are acknowledged to be guidance “beyond” binding EU law and the grant agreements.

In our view, this approach goes beyond the legal framework of the Grant Agreement, which requires respect for EU values, fundamental rights and non-discrimination, but does not require beneficiaries to adopt or endorse policy preferences expressed in non-binding political documents.

### **Activities and deliverables: what is actually criticized**

The Grant Agreement lists seven formal deliverables for Youth Act 2024: D1.1 (Minutes of the General Assemblies), D2.1, D2.2, D2.3 (three written outputs under WP2), and D3.1, D3.2, D3.3 (ten web articles, six newsletters, and two dissemination videos under WP3).

In addition, Annex 1 describes a very large number of events, trainings and exchanges that together form the 2024 operational plan.

The Review’s own assessment shows that:

- D2.2, the policy paper on how to ensure youth safe understanding of digital transformations, is considered relevant and its recommendations are described as useful, with the only criticism being that more concrete implementation proposals would have been welcome.
- D2.3, the e book on psychological resilience of children and youth, is described as clear and appropriate for young children, with suitable language, illustrations and an emphasis on empathy and gratitude; the criticism is limited to the observation

that the content is more suitable for children than for “youth” and that resilience is not adequately addressed. It must be emphasized that Annex 1 explicitly states that some activities are targeted towards individuals younger than 18, and such a proposal was approved by the EACEA at the application stage.

- D3.1 (ten web articles), D3.2 (six newsletters) and D3.3 (two dissemination videos) are largely described in factual terms, as documenting youth events, roundtables and debates; no breach of EU values is identified in these deliverables. A remark is made that “One speaker attributed the delay in parenthood among youth to ‘a reluctance to take responsibility’, which is the author’s personal opinion.

The only substantive policy criticism directed at a Youth Act 2024 deliverable concerns one aspect of D2.1, the policy paper on women’s mental and reproductive health. The Review notes that under the heading “Ensure access to quality healthcare”, in the context of reproductive health, the text does not refer to access to contraception and abortion but instead mentions “prenatal care, fertility treatments, and support for managing hormonal health conditions”.

The Review then makes a broader statement in its summary issues of compliance, alleging that “one sided and biased” material on sexual and reproductive health rights is present in the activities, that abstinence and natural family planning are emphasised, and that aspects such as contraception, abortion and LGBTIQ+ persons or single women are omitted or presented negatively.

It is important to underline that, in relation to Youth Act 2024, the Review does not identify any specific factual errors, false claims or scientifically incorrect statements within D2.1, D2.2, D2.3, the web articles, the newsletters or the videos. Where it comments on content, it either finds it neutral and appropriate, or disagrees with the emphasis or with the absence of certain topics.

In other words, the alleged “one sidedness” is not grounded in demonstrable misinformation or discrimination in the deliverables themselves, but in disagreement with the broader positions and activities of WYA SEE, particularly on reproductive health, abortion, contraception, comprehensive sexuality education and gender identity.

### **“One-sided and biased material on sexual and reproductive health rights”**

The central allegation is that Youth Act 2024 activities (for example summer schools in bioethics, fertility education and women’s health sessions) put a “strong focus on abstinence and natural family planning” while omitting or “presenting certain topics in a negative way (for example,... comprehensive sexuality education, oral contraception,

abortion and surrogacy”, thereby creating “partial or misleading impressions” and failing to provide “scientifically accurate, evidence based, non-judgmental and comprehensive sexuality education.”

First, Youth Act 2024 is not a CSE programme. It is an operating grant whose objectives are much broader: promoting youth participation, human dignity, digital skills, critical thinking, intercultural learning, volunteering and employability across more than 30 activities. The grant agreement never states that SSM JIE will provide comprehensive sexuality education, nor that each activity dealing with women’s health must follow one particular model of CSE.

Second, when certain activities under WP2 address women’s mental and reproductive health, they do so in a way that is consistent with Annex 1: from a human dignity perspective, with attention to mental health, informed consent, trauma, and holistic care. The Review itself recognises that many of the recommendations in D2.1 concern mental health, informed consent, access to quality care and respect for vulnerable people, and describes these as “neutral and unobjectionable”.

Third, when women’s health information and hormonal health approaches to mental health and medical care are presented as options, they are presented as part of a wider conversation about informed consent, healthy relationships, and respect for bodily integrity. We reject that including these elements makes the grant activities or deliverables “biased” or harmful. On the contrary, it reflects a legitimate ethical and scientific perspective that prioritises health and empowerment, alongside medical care and support. The Review cites no scientific or legal evidence to show that presenting hormonal health, emotional education, or fertility awareness alongside other information about women’s health in non-formal education settings is contrary to Article 14 of the Grant Agreement.

What the Review appears to object to is not that our activities are factually inaccurate or discriminatory, but that they do not adopt the language and framing of “comprehensive sexuality education” as defined in certain UN and EU policy documents. Those documents, however, are not international law nor legally binding, are not incorporated into the Grant Agreement, and the Review explicitly acknowledges that it is drawing on such resolutions and strategies as context “beyond” the applicable law.

We acknowledge that Article 14 requires respect for human dignity, non-discrimination and fundamental rights. We also agree that the Review goes “beyond the general framework of the ...grant agreements themselves” and note that individual reviewers go beyond their mandate in attempting to oblige civil society organisations to endorse one

specific pedagogical model in their own organizational activities, in matters relating to sexual and reproductive rights.

### **Policy papers, white papers and “dismissing widely accepted scientific evidence”**

The Review’s second major allegation is that WYA’s white papers are one sided, “at odds with established EU positions” and “restrict scientific accuracy and information”, in particular regarding gender identity, sexuality education and HIV prevention.

This allegation is not supported by evidence nor is any such content part of the texts it refers to. WYA’s white papers stand on their own. They are outside the scope of this Review and have no bearing on the content created for this grant. They were published before the grant process began, and, in the case of the white paper on sexual education, was published in a peer-reviewed publication in 2014.

The EACEA inclusion of a section of its Review Report, critiquing scientific and evidence-based publications developed long before this grant is a further example of a bias towards predetermined conclusions that led to the drafting of this review, and ideological bias represented in such remarks.

The Review suggests that World Youth Alliance “downplays” condom effectiveness and rejects mainstream HIV prevention strategies. A closer reading of WYA’s HIV/AIDS White Paper shows something very different. The document relies extensively on data from WHO, UNAIDS, and the World Bank. It uses standard epidemiological distinctions, such as concentrated versus generalized epidemics, and acknowledges the same scientific evidence about routes of transmission that international agencies rely on.

Far from denying the effectiveness of condoms, the White Paper recognizes them as an important risk-reduction tool. It simply notes, in line with public health teaching, that condoms reduce but do not eliminate the risk of HIV transmission, and that the balance of prevention strategies may differ depending on the type of epidemic. It also highlights the central role of antiretroviral therapies and emphasizes that prevention should integrate treatment, care, and support.

The Review claims that WYA “dismisses” accepted norms by stating that there is no human right to comprehensive sexuality education. In reality, WYA’s Sexual Education White Paper is a legal analysis, not a rejection of science. It examines the claim often made by NGOs, UN rapporteurs, or advocacy groups, that CSE is a binding international human right, and concludes that this is not supported by the actual sources of international law. This is a standard legal position: binding rights come from treaties and customary law, not from policy documents or political declarations.

The same holds true within the EU. While EU institutions may promote CSE in certain political resolutions or strategies, these are not binding legal obligations on Member States. Education remains a national competence. EU policy preferences do not create enforceable rights. Again, we must emphasize - this document was created 10 years before the implementation of the WGHD project grant, is outside of the scope of the project and its inclusion here only serves to contradict another review allegation - that WYA was in any case unclear about its positions or activities in the time or during the application process.

On gender, the Review objects that WYA “rejects the claim that gender can contradict biological sex” and asserts that this is contrary to the EU LGBTIQ Equality Strategy, which separates and protects both sex and gender.

WYA affirms that human beings are embodied persons, and that our biological sex<sup>1</sup> is a fundamental aspect of who we are, not a trait that can be conceptually severed from personal identity. This is a scientific, philosophical and anthropological understanding of the human person supported by foundational and clinical science<sup>2</sup>, articulated in the WYA Charter and consistently reflected in our educational materials.

EU primary law itself uses sex-based terminology, and the core value of gender equality in Article 2 TEU is expressed explicitly as “equality between women and men.” The Treaty does not define gender as an autonomous identity category, nor does it present gender identity as conceptually separable from sex. Member States retain wide discretion in how they understand and regulate gender-related matters, reflecting their constitutional traditions, ethical frameworks, and cultural diversity. WYA’s position aligns with this

---

<sup>1</sup> “Across anisogamous species, the existence of two—and only two—sexes has been a settled matter in modern biology.” Wright, Colin M.; *Why There Are Exactly Two Sexes*, *Arch Sex Behav* (2025)., <https://doi.org/10.1007/s10508-025-03348-3>

<sup>2</sup> “The male-determining gene in humans, called the sex-determining region Y (SRY) gene, was discovered in 1990 (Figure 4.10). This gene is found in XX males and is missing from XY females; it is also found on the Y chromosome of other mammals. Definitive proof that SRY is the male-determining gene came when scientists placed a copy of this gene into XX mice by means of genetic engineering. The XX mice that received this gene, although sterile, developed into anatomical males. The SRY gene encodes a protein called a transcription factor (see Chapter 13) that binds to DNA and stimulates the transcription of other genes that promote the differentiation of the testes. Although SRY is the primary determinant of maleness in humans, other genes (some X linked, others Y linked, and still others autosomal) also have roles in fertility and the development of sex differences. The presence of the SRY gene on the Y chromosome causes a human embryo to develop as a male. In the absence of this gene, a human embryo develops as a female.” Pierce, Benjamin A., *Genetics: A Conceptual Approach*, 4th ed., W. H. Freeman and Company, 2012, New York, p. 80

legal landscape: it does not contradict EU values, nor does it undermine equality before the law.

None of WYA's white papers advocate stigma or discrimination against any person. They are built around a consistent affirmation of the intrinsic dignity of every human being, regardless of health status, sex, beliefs or background. Disagreeing with certain EU resolutions or Commission communications does not amount to rejecting "science" or breaching EU law.

### **Youth participation, selection and contribution to design**

The Review Report expresses concern about a supposed lack of information regarding how young people were selected and how they contributed to the design of deliverables, suggesting that the activities mainly reflect the organisation's own perspective rather than youth-led input. This conclusion does not accurately reflect the structure of Youth Act 2024, the nature of an operating grant, or the way SSM JIE functions as a youth organisation.

From the outset, the proposal and the Grant Agreement explain that WYA SEE is composed of young people aged 18 to 30 and that all activities of the 2024 work programme are carried out by youth and for youth. This is not an accidental feature of this specific grant implementation but its defining characteristic. The day-to-day work, leadership roles, content development and coordination tasks are entrusted to young staff members, interns and volunteers. Every activity was conceived, organised and implemented by young people, which is precisely the operational model expected of a youth led association receiving an operating grant.

The Grant agreement describes numerous activities that illustrate this reality. Young members designed and facilitated critical thinking sessions, coordinated internship and mentoring initiatives, drafted and presented training modules, moderated intercultural discussions, organised community service projects, and produced communication materials such as articles, newsletters and videos. The videos submitted under D3.3 visibly feature young participants and explain the impact of these activities from their own perspective. The structure of the work programme presupposes youth leadership in both content and delivery. Activities such as chapter meetings, youth leadership training, and local presentations explicitly rely on young people who plan sessions, choose themes, share their own experiences and take responsibility for implementation.

The Review's remarks appear to conflate two separate issues. One concerns the level of detail provided in the reporting documents about the mechanisms of participant selection and the specific ways youth voices were integrated into each step of the work.

If the Agency would like more explicit procedural descriptions in future reports, we are ready to provide them. The second issue, however, is whether the project was in substance youth driven. On this point, Youth Act 2024 fulfilled the Grant Agreement in full. The work was led by young people, designed by young people, and implemented for the benefit of young people, particularly those with fewer opportunities. The participants themselves contributed through debates, workshops, planning tasks, peer to peer learning, and structured feedback, all of which shaped how activities were delivered and refined over the course of the year.

### **Alleged “omission” of positions at application stage**

The Review Report suggests that WYA SEE failed to disclose “key aspects” of its wider positions during the application phase, naming our views on abortion, comprehensive sexuality education, family planning, and the moral status of early human life. The implication is that our public positions should have been reproduced in detail in Annex 1, and that not doing so amounted to withholding information.

This allegation is unfounded. The Grant Agreement did not require beneficiaries to submit an exhaustive description of their organizational philosophy. What was required, and what WYA SEE provided, was a clear articulation of the project’s mission, objectives, methodology, impact, target groups, work packages, and the specific deliverables committed under each deliverable. All of this was transparently set out in the application documents and is reflected in Annex I.

World Youth Alliance is not an opaque or unknown organization. Our philosophical commitments, including the centrality of human dignity, the integration of body and person, the importance of informed decision-making, have been publicly articulated for more than 25 years. At the time of application, and indeed for decades before, these positions were prominently displayed: on the WYA website (charter, mission, and program descriptions); in publicly available white papers, policy briefs, and educational guidelines; across official social media accounts; in training programs run in multiple European countries, in public events, conferences, and youth training programs. The Review itself makes this clear when it states that it relied on “accessible public information” from WYA’s website and related platforms as part of its assessment. These positions were openly available to the Agency not only during the review, but also at the time of application. There is therefore no factual basis to claim that anything was omitted or hidden.

The application described the activities that Youth Act 2024 would implement. Those activities were carried out in accordance with Annex 1 in full.

## **Membership, inclusivity and participation**

The Review raises concerns that restricting membership to those who sign the WYA Charter “may limit inclusivity and discourage or exclude participation from young people with diverse perspectives”, and suggests that this contrasts with Erasmus+ objectives of openness and pluralism.

Here, it is crucial to distinguish between membership in an association and participation in project activities. Like many other civil society organisations in Europe, WYA SEE has a defined set of values and asks those who become formal members to endorse them. This is a normal aspect of freedom of association. Article 12 of the Charter and Article 11 of the European Convention on Human Rights protect the right of individuals to form associations around shared beliefs and purposes.

At the same time, Youth Act 2024 activities are not restricted to members only. Local presentations, trainings, summer schools, conferences, webinars and volunteering projects are open to a wide range of young people, including those who are not WYA members and who may not share all our positions. Annex 1 emphasises outreach to youth with fewer opportunities and from different cultural and social backgrounds.

The Grant Agreement regulates the use of EU funds and requires non-discrimination in access to project activities. It does not regulate the internal membership criteria of NGOs, nor does it require that associations abandon value-based membership to receive an operating grant. The Review does not cite any instance in which a young person was actually excluded from Youth Act 2024 activities on the basis of belief, or any other characteristic.

In practice, the project promotes intercultural dialogue, solidarity, and respectful debate, including on sensitive issues such as life, family, euthanasia and palliative care. The fact that speakers or participants express clear positions in those debates, including opposition to euthanasia or to certain family policies, does not mean that any views are censored or that participants cannot speak freely. The Review itself notes that the videos of participant feedback describe “well rounded debates”.

## **Use of non-binding resolutions and strategies as compliance benchmarks**

A recurring feature of the Review is the use of European Parliament resolutions (on SRHR, on LGBTIQ rights, on HIV/AIDS) and Commission strategies (for example the LGBTIQ Equality Strategy and Roadmaps on women’s rights) as interpretive benchmarks for Article 14 of the Grant Agreement.

These documents are not binding legal instruments, and they do not amend the text of the Grant Agreement of the Erasmus+ Regulation nor can they be interpreted as benchmarks for respecting basic EU values as enshrined in Article 2 TEU. They express policy positions and directions, not enforceable legal obligations on NGOs that receive operating grants.

Article 2 TEU and the Charter commit the Union to values of human dignity, freedom, democracy, equality of women and men, the rule of law, pluralism, non-discrimination, tolerance and solidarity. Those values include respect for diversity of thought and belief. The Erasmus+ Regulation itself stresses respect for the Charter and for equality between women and men, and prohibits discrimination on grounds including religion or belief.

It does not require ideological uniformity or adherence to the specific policy lines of every parliamentary resolution. In several instances, the Review effectively treats disagreement with the policy content of these resolutions as evidence of “non-compliance” or “discrimination” in itself. We cannot accept that interpretation. Civil society in the EU must retain space to engage in good faith disagreement on contested ethical, philosophical and legal questions, while still fully respecting the fundamental rights of all persons.

Further evidence of striking bias in the conduct of this Review is that it also relies on policy documents that did not exist at the time Youth Act 2024 was designed, approved or implemented. The reference to the EU LGBTIQ Equality Strategy 2026–2030 (adopted in October 2025) and to the Roadmap for Women’s Rights (Commission Communication, March 2025) illustrates this problem clearly. These instruments postdate both the call for proposals and the implementation period of the grant. Not only are they non-binding communications, but they are being treated as compliance benchmarks for activities carried out under a 2024 operating grant. It would be contrary to the principles of legal certainty and non-retroactivity to evaluate a beneficiary against political documents that were drafted or adopted after the work programme had already been completed.

The Erasmus+ Regulation, the Financial Regulation and the Grant Agreement establish the legal framework for compliance. Non binding resolutions and strategies already fall outside that framework; applying future and yet-to-be-adopted political documents as if they were binding standards exacerbates the problem. The use of such documents in the Review underscores the broader issue: the assessment is not grounded in the activities and deliverables of Youth Act 2024, but in an evolving set of political preferences that sit outside the Grant Agreement. These cannot be retroactively imposed.

WYA SEE stands by its positions on human dignity, life, family, sexual education and gender, as expressed in their public documents. We do so while clearly affirming, in both

word and practice, the equal dignity of every human being and the rejection of violence or discrimination against any person.

### **Procedural irregularities performed by EACEA in this review process**

In addition to responding to the allegations in the Review Report, we want to briefly reflect on our experience during the ongoing review process. For more than a decade, we have worked with the EACEA in a professional, transparent and open way. Our grant reviews, questions, and communication have reflected the fair, impartial and legally based processes the EACEA prides itself upon. We were treated equally with all other grant recipients during this time.

This has not been our experience with this review. We have not been treated openly and transparently as we have in the past; leading us to question if we have been treated equally with all other grant recipients this time as well. Irregularities in our communication and treatment during this process include the following:

1. No meeting between the beneficiary and the body performing the review was requested or held prior to receipt of the letter and Review Report. While there is no obligation to conduct such a meeting, it is the common approach by the EACEA and their grant review process, and, when conducted, is constructive, evidence-based and supports dialogue and mutual understanding.
2. During the review process, WYA SEE was asked to send numerous participant lists, materials and supporting documentation. Most of this was not taken into account during the review process nor mentioned in the Review Letters. In fact, a significant portion of the Review Letter discusses other materials produced by WYA (such as the WYA White Papers), although they were not produced by the project itself.
3. During the review process, EACEA used some of the participant contacts to contact participants asking them about their opinions about WYA. The “questionnaire” that was a part of “this monitoring exercise” also included instructive questions, such as: “Do you consider that it would be possible for someone to participate in WYA activities if they did not share their values?”, “Were perspectives/views/values other than those associated with WYA presented in the workshop/event/training?” or “Were there any topics not covered during the workshop/event/training which you think should have been addressed?”.

In the light of the Review Reports, it is clear that those questions were asked to support the pre-determined conclusions made by the EACEA.

Despite the obvious bias of the survey questions, some participants responded to the EACEA questionnaire negating the implications. They commented that they had a positive experience, that events provided equal time to diverse and various viewpoints, that debate and discussion took place in an open and constructive environment, and that individuals who do not share WYA values participated in the project activities. None of these responses were included in the project review, thus invalidating the credibility of the "monitoring exercise".

## Conclusion

Youth Act 2024 delivered exactly what was promised in the Agreement: a youth led work programme built on human dignity, civic participation, mental health support, digital literacy, intercultural dialogue and non-formal education, implemented through more than thirty activities that reached tens of thousands of young people. The Review acknowledges that the vast majority of the deliverables are relevant, appropriate and aligned with the call. Where it raises concerns, they relate not to the activities themselves, nor to any factual inaccuracy, exclusion or discriminatory practice, but to disagreement with WYA SEE's broader ethical and educational framework and to the absence of references to political positions found in non-binding EU resolutions and strategies.

Disagreement with such documents cannot constitute non-compliance under Article 14 of the Grant Agreement. EU primary law protects pluralism, freedom of association and freedom of thought, and the Grant Agreement evaluates operating grants on the basis of the activities implemented, not the political preferences of the evaluator. As the Review itself recognises, several of the policy documents it invokes lie "beyond" the applicable legal framework, and some postdate the implementation of the grant altogether. They cannot be retroactively applied as conditions for compliance.

Youth Act 2024 was implemented transparently, lawfully and in full respect of the Charter. Its activities were open to all participants, including youth with fewer opportunities. No evidence is presented of misinformation, exclusion, harm or discriminatory conduct. Young people contributed actively to the design and delivery of the work, experienced the activities as meaningful and empowering, and reported positive impacts throughout the submitted materials. Therefore, we maintain that Youth Act 2024 meets the requirements of the Grant Agreement and reflects the diversity of civil society that is indispensable to the life of the European Union and find the present Review to be biased and the allegation that WYA SEE in any way breaches basic EU values outrageous and completely unfounded.

Sincerely,  
WYA SEE Team