

Response to the EACEA Review Report and Review Letter

Project 101161773 - WYAE OG 2024

Executive Summary

The Review Report and Review Letter concerning project 101161773 - WYA E OG 2024 acknowledges that the organisation delivered the required outputs for the 2024 work programme. No substantive questions were raised. The central critiques do not concern the grant deliverables, but relate to broader positions of the World Youth Alliance as an organisation, which are drawn from its mission statements, white papers and website, and not from the activities or materials implemented under Annex 1. The Review thus evaluates matters outside the contractual scope of the operating grant.

A careful analysis shows that the Review relies heavily on non-binding political acts such as European Parliament resolutions and Commission documents, treating them as normative compliance benchmarks, including documents that did not exist during the grant period. It also introduces a new interpretation of Article 14 of the Grant Agreement, suggesting that disagreement with certain policy positions constitutes a breach of EU values. This interpretation exceeds the mandate of Article 14 and risks undermining the pluralism, neutrality and equal treatment required under EU law.

The 2024 work programme of WYAE was implemented as described in Annex 1. All activities were youth led, open to diverse participants, and aligned with the objectives of inclusion, democratic engagement, intercultural dialogue and human dignity. No evidence is presented of exclusion, misinformation, discrimination or harm. The Review concerns positions that are public, longstanding and unrelated to the fulfilment of the operating grant. WYAE maintains that the 2024 work programme fulfilled the Grant Agreement in full.

Introduction

WYAE OG 2024 is an operating grant that supports the functioning and annual work programme of World Youth Alliance Europe. The Grant Agreement makes clear that operating grants are a financial contribution to the beneficiary's work programme for the given year. Annex 1 describes a set of activities aimed at empowering young people, strengthening their participation in democratic life, promoting human dignity, fostering intercultural dialogue, supporting social inclusion, and providing non formal education opportunities through the organisation's established youth programmes.

The Review acknowledges that the objectives set out in the Grant Agreement are relevant and in line with the call, and that WYAE fulfilled the deliverables of the three work

packages. Coordination and statutory meetings, communication and visibility actions, youth engagement events, advocacy towards decision-makers, workshops, training sessions and policy papers were all carried out during 2024, as documented in the Technical Report. The Review does not dispute that the work programme was delivered or that the deliverables were produced.

The Review recognises that the objectives set out in the Grant Agreement, including increased participation and empowerment of young people, the promotion of human dignity, human rights, inclusion and diversity, and the fostering of tolerance, respect and dialogue, are relevant and in line with the call. The work programme, as described in Annex 1 and the Technical Report, centres on youth empowerment, civic participation, intercultural learning, non formal and informal education, advocacy towards decision-makers and the production of communication materials aimed at informing and engaging young people. The Review does not question the relevance or alignment of these core activities with Erasmus+ priorities.

These activities constitute the core of the organisation's 2024 work programme. The Review does not question their relevance to Erasmus+ priorities or their execution as described in the Technical Report. Rather, its concerns are directed at the organisation's broader positions and activities, drawing on materials outside the scope of the operating grant.

The review also confirms that the activities and deliverables specified in the Grant Agreement were carried out. The report states that the planned activities were implemented and that a periodic report was provided, demonstrating compliance with the requirements of the grant. This shows that the organisation delivered on its commitments and ensured that the work programme was executed as agreed.

The reviewers highlighted that the project produced the required outputs, such as policy papers and handbooks, which addressed important themes including humanitarian aid, youth policy improvement, and women's mental and reproductive health. These deliverables were recognised as completed and provided innovative approaches, for example, integrating young people's reflections on humanitarian aid and emphasising ethical values such as dignity, solidarity, and subsidiarity.

Scope and Methodology of the Review

Operating grants support the annual work programme of a beneficiary; they are not mechanisms for scrutinising an organisation's entire philosophical or ethical identity. Yet the Review repeatedly relies on materials that lie entirely outside the WYAE OG 2024 project, including WYA white papers on HIV/AIDS, sexual education, gender and

reproductive health, the organisation's Charter, blog posts and public statements. None of these documents were produced under the operating grant, nor were they submitted as deliverables. They fall outside Annex 1 and cannot be used to evaluate the implementation of the 2024 work programme.

The Review also relies extensively on non-binding political instruments, such as the European Parliament Resolution of 24 June 2021 on sexual and reproductive health and rights, resolutions on LGBTIQ rights, the Commission's LGBTIQ Equality Strategy 2020–2025, and even forward looking documents like the forthcoming 2026–2030 Strategy and the March 2025 Roadmap for Women's Rights. These texts express political priorities of the bodies that adopted them but they are not binding legal sources, and the Grant Agreement does not incorporate them as compliance standards. Some of these instruments did not even exist during the implementation period. Using them as normative benchmarks introduces obligations not contained in the contract and undermines the principle of legal certainty and the legitimate expectations of the beneficiary.

Implementation of the 2024 Work Programme

The Review does not dispute that the work programme was carried out. The Technical Report details the implementation of each work package, including statutory and coordination meetings, thematic activities, advocacy and outreach actions, communication and visibility outputs and youth participation initiatives. The Review does not identify shortcomings in these deliverables. It raises no concerns about their factual accuracy, accessibility, inclusivity or relevance. Nor does it suggest that any planned activity failed to occur; the activities foreseen in Annex 1 were delivered as described.

The review remarks that “[d]iversity is important to provide input for the organisation of activities to meet the Erasmus+ objectives on active participation, co-creation, and democratic engagement. Activities seem to reflect mainly the organisation's position and provide little evidence of youth-led input.” The 2024 work programme was designed, led and implemented by young people, in line with the organisation's structure and with the expectations set out in the Grant Agreement. Youth leadership is inherent in the organisation's functioning: young staff, interns, volunteers and members aged 18 to 30 prepared publications, drafted analyses, organised and moderated events, produced communication materials and contributed to stakeholder engagement. Nowhere in the body of the Review is this conclusion developed or backed with evidence, and in the analysis of deliverable D6 the reviewers explicitly note that “the inclusion of young people's reflections on the role of humanitarian aid in times of crisis is an interesting approach that is not often explicitly promoted.”

The same phrasing appears in the two other Erasmus+ reviews (Youth Act 2024 - YA2024 and Women's Health Goes Digital - WHGD) issued to the organisation in late 2025 for the 2024 projects, despite the differing structures, objectives and deliverables of those work programmes. Its repetition across three distinct grants, and its lack of connection to the evidence presented in the OG 2024 Review, suggests that it is a formulaic remark rather than a conclusion arising from the assessment of this project. Given the reference to other grants, the repeated use of the exact same phrases, and the incredible claim that a youth organization shows "little evidence of youth-led input", we are left to wonder if the Reviewers even appropriately examined the grant under review. All available evidence demonstrates that the activities were designed and implemented by young people in full accordance with Annex 1 and with the principles governing youth-driven operating grants.

No deliverable is challenged for being discriminatory, inaccurate or misleading. The concerns expressed in the Review do not relate to the outputs of the 2024 work programme but to the organisation's broader activities and positions, which lie outside the scope of the operating grant and were not produced under it.

Response to EACEA critique of WYA positions

The EACEA review primarily focuses its critique on WYAE positions, documents, and statements that are public and outside of the scope of this grant. Most of these documents and position statements were published years prior to this grant, and represent public, well-known positions of WYAE, including at the time of our grant application. As a courtesy, the following information, context, and response to these inquiries and critiques is provided below. We reiterate that these documents, questions, and queries are outside of the scope of the Grant Agreement and should not be included in the present Review.

WYA's Position on Human Dignity and the Family

The Review raises concerns regarding two of the organisation's positions from its Charter that form the basis of WYAE's identity: that human dignity begins at conception, and that the family is the fundamental unit of society. These statements were not produced under the OG 2024 grant and do not constitute project deliverables. Nevertheless, because the Review invokes them as potential Article 14 compliance issue, a clarification is necessary.

"Human dignity begins at conception"

The position that human dignity begins at conception is grounded in scientific evidence as well as recognized in European ethical, cultural and legal thought. It does not imply the exclusion, denigration or diminished dignity of any person. On the contrary, it asserts that

every human being, without distinction, possesses inherent and equal worth. It is consistent with international human rights instruments. The Preamble to the Convention on the Rights of the Child, ratified by all EU Member States, affirms that: “the child... needs special safeguards and care, including appropriate legal protection, before as well as after birth.”

The Charter of Fundamental Rights protects the right to life (Article 2) “Everyone has the right to life”, freedom of thought, conscience and religion (Article 10), and freedom of association (Article 12). These rights include the freedom of civil society organisations to articulate philosophical understandings of the human person based on scientific knowledge. Affirming human dignity from conception is an inclusive claim, not an exclusionary one. The statement reflects a widely held scientific fact: biological development begins at fertilization

“The family is the fundamental unit of society”

The statement that the family is the fundamental and natural unit of society is not unique to WYA. It reflects language present in widely ratified international human rights instruments, including Article 16(3) of the Universal Declaration of Human Rights, which declares “The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.”

This principle is also affirmed in the International Covenant on Civil and Political Rights Article 23(1) “The family is the natural and fundamental group unit of society and is entitled to protection by society and the State” and the International Covenant on Economic, Social and Cultural Rights “The widest possible protection and assistance should be accorded to the family, which is the natural and fundamental group unit of society...”, both binding on all EU Member States. The European Convention on Human Rights and the Charter of Fundamental Rights provide extensive protections for family life and also recognise the family as a key social institution.

To suggest that affirming the family as the natural and fundamental unit of society is “limiting,” “exclusionary,” or incompatible with Erasmus+ objectives (openness, intercultural exchange, pluralism) or that it in any way constitutes a breach of Art 14 of the Grant Agreement places the Review in a position that is impossible to reconcile with the established architecture of international and European law governing human rights.

Response to the Review’s Claims Concerning Gender

The Review asserts that WYA’s view “that gender cannot contradict biological sex” may be “non-inclusive” or in tension with the Union’s policy approaches. This characterisation is incorrect and deeply misleading.

WYA affirms that human beings are embodied persons, and that our biological sex 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, 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 legal landscape: it does not contradict EU values, nor does it undermine equality before the law. It would be absurd to suggest that holding a view widely shared across Member States and deeply embedded in European legal and cultural traditions somehow violates Article 14.

Finally, the statements criticised by the Review originate in WYA’s external educational materials, not in the 2024 work programme, not in any deliverable, and not in any activity funded under the operating grant. They fall entirely outside the scope of the project and cannot be used as compliance benchmarks.

Response to the Review’s Claims Concerning HIV/AIDS

The Review further claims that WYA’s HIV/AIDS white paper “downplays the effectiveness of condom use” and does not follow WHO/UNAIDS guidance. This allegation is unfounded and reflects a misreading of the document.

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 a 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.

Article 14 and EU Values

The Review repeatedly implies that WYAE's ethical positions may be "incompatible" with Article 14 or with Article 2 TEU. This interpretation is not supported by EU law. The values of Article 2 TEU include pluralism, tolerance, justice and respect for human rights, values that protect, not prohibit, diverse ethical perspectives. The Charter protects freedom of thought, conscience, religion and association. These protections apply to organisations as well as individuals.

Recognising human dignity from conception, affirming the biological reality of men and women, or supporting the centrality of the family in society, are legitimate positions rooted in scientific arguments and deeply rooted in Europe's philosophical and cultural traditions. These positions are clearly within the range of views protected in a democratic society. Nothing in EU law mandates a specific ethical or anthropological worldview. Article 14 cannot be interpreted as requiring alignment with non binding political resolutions.

Use of Non-Binding EU Documents

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 Operating Grant 2024, but in an evolving set of political preferences that sit outside the Grant Agreement. These cannot be retroactively imposed.

Youth Participation and Inclusivity

The Review raises several concerns about youth participation, but these remarks reflect expectations that do not correspond to the reality of this operating grant. The Technical Report shows that the 2024 work programme was designed and carried out by young staff, interns and volunteers aged 18 to 30, consistent with Annex 1 and with the definition of a youth NGO under Erasmus+. The Review does not dispute that the planned activities were implemented. WYAE agrees that the grant was completed in full.

Young people contributed to the work programme by virtue of their role within the organisation: they drafted publications, designed communication materials, organised events, moderated discussions and carried out policy monitoring. These contributions are documented throughout the Technical Report. The work programme is youth led because the organisation itself is youth led.

The Review’s remark that videos featuring young people are “few” has no basis in the Grant Agreement. Visibility materials have been delivered in the required amount, and the videos produced serve their intended purpose: presenting the activities and showing youth engagement. If the Agency wishes more video material, they can make it a requirement in future grant agreements.

The Technical Report documents inclusive practices such as multilingual communication, open online participation, and engagement with young people from diverse backgrounds. No exclusion occurred. Finally, the expectation that the organisation document changes in young people's "relationship with decision-makers" goes beyond the contractual obligations of an operating grant. Annex 1 requires that young people be given opportunities for civic engagement, democratic participation and policy awareness; the 2024 work programme accomplished this precisely through monitoring activities, advocacy trainings, and participation in EU-related events.

WYAE Social media

The Review Report asserts that a single WYA Facebook post was "misleading" in stating that "the provision of abortion services and contraception has not historically been a component of and is not necessary for reducing maternal mortality," suggesting instead that "overwhelming evidence" links restrictions on abortion to increased maternal deaths. This characterization does not accurately reflect the historical or scientific record, nor does it engage with the underlying evidence on which WYA's statement is based.

The sentence quoted by the Review from the social media post appears verbatim in the WYA Maternal Health White Paper, a document reviewed by two licensed OB/GYN physicians and grounded in data from WHO, the World Bank, UNICEF, and major peer-reviewed medical literature. Its central point is scientific and historical: that countries achieved dramatic, sustained declines in maternal mortality long before the advent of modern contraception or the legalization or medicalization of abortion.

There is rigorous evidence that large, sustained reductions in maternal mortality have occurred in contexts where abortion services did not exist, and in some cases became more legally restricted. The best-known example is Chile. A major longitudinal study by Koch et al. (PLoS One, 2012) quoted in the White Paper examined maternal mortality in Chile from 1957 to 2007. Over that fifty-year period, the maternal mortality ratio declined by more than 90 percent, and abortion-related mortality fell by over 99 percent. Crucially, the authors concluded that "the reduction in the [maternal mortality ratio] was not related to the legal status of abortion" but was associated with women's education and improved maternal health facilities.

The Review cites a single 2022 policy-brief summary of an econometric model concerning U.S. foreign-aid spending patterns. That paper neither contradicts nor even addresses the scientific record outlined in the WYA white paper. It does not examine the centuries-long trajectory of maternal mortality reduction, nor does it offer causal evidence on the medical determinants of maternal death. The post in question references

what has historically reduced maternal mortality; the cited study concerns contemporary foreign-policy correlations. These are entirely different questions.

In short, the statement identified by the Review Report is a faithful summary of well-established evidence and WHO-recognized medical determinants of maternal death, as thoroughly presented in the WYA Maternal Health White Paper.

We again note that this post was not part of the Operating Grant deliverables. It is outside of the scope of the Grant Agreement and cannot be part of the present Review.

Alleged “Risk of Exclusion”

The Review asserts that WYAE’s ethical positions may send an exclusionary message. No evidence is provided. Activities were public and open. Participants came from different national, cultural, linguistic, and socio-economic backgrounds. The communication outputs show youth describing inclusive environments.

Response to Specific Objections to Each Deliverable

D8: Handbook with best practices, approaches and methodologies organisation in implementing programs in the field of women’s mental and reproductive health and rights

According to the Grant Agreement for WHGD, the Handbook of Best Practices is the principal output of Work Package 1, whose purpose is to collect, systematize, and present the methodologies, approaches, and programs already implemented by partner organizations in the field of women’s mental and reproductive health and rights. The deliverable is therefore conceived as a mapping tool: it aims to document the practices partners bring into the project, not to invent new ones or to present an exhaustive catalogue of all practices existing within the EU. Annex 1 of the Grant Agreement explicitly states that WP1 will “gather existing approaches and methodologies from partners as a basis for program development”.

The deliverable itself reflects this purpose. The Handbook of Best Practices is structured as a descriptive compilation of eight programs that partners currently run or have developed over time. It does not present these practices as universal standards, nor does it make prescriptive claims. Instead, it describes the origins, content, methodologies, and educational or medical basis of each program. These include mental health programs, trauma support and personal development courses, migrant integration initiatives, fertility literacy programs, university level academic instruction, logotherapy, and medically grounded reproductive health programs such as FEMM. The Handbook makes clear in its introduction that it is a showcase of what partners are already doing, serving

as a foundation for the training methodology that will be developed later under WP2 of the WHGD grant.

Against this background, the Review Report's objection that the Handbook presents "one sided methods" misunderstands the nature of the deliverable. A best practices compilation is, by definition, descriptive rather than normative. It captures the lived methodologies of the partner organizations as they exist; it is not designed to represent all possible methodologies in Europe, nor to achieve an externally imposed ideological balance. The selection of programs arises from partner expertise. To require partners to include programs they do not run, or to align the Handbook with a preselected political or policy framework, would contradict WP1's purpose as defined in the Grant Agreement.

The Review Report raises concerns about the presentation of certain programs in the Handbook, particularly Teen STAR, the summary of Dr. Miguel Ángel Martínez's research, and a participant's personal feedback regarding contraceptive use.

The assertion that "intellectual rigour would require a critical presentation of all scientifically or philosophically based points of view" reflects a misunderstanding of what this deliverable is meant to achieve. The Handbook was never conceived as a comprehensive academic review or as a neutral comparative analysis of every existing approach to reproductive health. Under the Grant Agreement, Work Package 1 had a very specific and limited purpose: to document the programs, methods, and approaches that the partner organizations already employ in their work. It is, in essence, a descriptive compendium of lived practices, not a theoretical textbook.

The "intellectual rigour" standard invoked by the reviewers would be appropriate for an academic monograph or a university curriculum, but it is misplaced here. WP1 did not call upon partners to critique their own programs or to juxtapose them with every alternative methodological framework. It called upon them to present, faithfully and transparently, the practices they currently implement. The Handbook accomplishes exactly that.

The Review Report cites several phrases from the Teen STAR description as evidence of bias, yet these quotations simply reflect the nature of the program itself. Teen STAR is not an ad hoc creation of the consortium; it is an established emotional–sexual education program with decades of international use, including in several EU Member States. Its pedagogical framework is well known: it emphasizes emotional maturation, self-knowledge, responsible decision making, and a holistic understanding of fertility and sexuality. The Handbook merely summarizes these features because that is the function of a best practices document. It is not offering Teen STAR's philosophy as the normative

standard for the WHGD project, but accurately reporting what one partner organization already uses in its own educational work.

The Review Report's concern that Teen STAR promotes abstinence, values chastity, or encourages young people to develop self-mastery is, in context, misplaced. These elements are simply part of Teen STAR's established educational philosophy. More importantly, there is nothing in EU law, the Grant Agreement, or Article 14 that prohibits an educational program from promoting these values. Abstinence, self-discipline, and reflective decision making are legitimate components of many youth education programs across Europe. The presence of these values does not render a program biased; it reflects the diversity of pedagogical approaches that exist within a pluralistic society.

The same applies to the statement that instructors "must believe in the program's values". Far from being unusual, this is characteristic of many pedagogical approaches. This requirement does not transform these programs into ideological instruments; it simply ensures methodological consistency.

The Review Report also takes issue with the section of the Handbook summarizing research presented by Dr. Miguel Ángel Martínez, noting in particular his explanation that life begins at fertilization and his discussion of Natural Family Planning as an effective method. A scientifically grounded understanding of fertilization is essential in any discussion of reproductive health. The Review Report's objection to the statement that "life begins at fertilization" overlooks that this is not a philosophical assertion, nor a religious claim, nor an ideological position. It is a basic embryological fact taught in standard medical textbooks used across EU Member States.

According to the science of human embryology, the process of fertilization results in the formation of a new, genetically distinct human organism, marking the beginning of human biological development. As every first-year medical student learns, when the sperm and oocyte fuse, they give rise to a zygote that constitutes the beginning of a new human being, with its own chromosomal and molecular identity. This is the foundational definition that underpins all subsequent explanations of early embryonic development and is not contested in scientific literature.

Similarly, the presentation of Natural Family Planning as an effective method is grounded in decades of research on the physiology of the ovulatory cycle, hormone variation, cervical mucus biomarkers, and basal body temperature patterns. Explaining these mechanisms in an educational program does not exclude or diminish the reality of other methods; it simply conveys medically accurate information about the biology of fertility. These topics appear routinely in medical, midwifery, and nursing curricula throughout Europe.

The Review Report's critique of the reference to students who chose to discontinue contraceptive use or to adjust their relationship dynamics profoundly misinterprets what the Handbook reports. The passage does not describe a program goal, policy preference, or expected outcome. It simply conveys feedback shared voluntarily by some participants, illustrating how the information they received influenced their personal choices. In the context of reproductive health, such choices are not only legitimate but expressly protected: informed consent and informed decision making are foundational principles of modern reproductive health care. It is a core tenet of EU health ethics that every person has the right to make autonomous decisions about their own body, their contraceptive use, their relationships, and their fertility intentions.

To suggest that reporting these decisions is “biased” misunderstands the fundamental nature of reproductive autonomy. A participant has the same right to decide to discontinue contraception as another participant has to begin or continue using it. Both are expressions of personal agency. The role of an educational program is not to steer individuals toward a predetermined choice, but to provide accurate information so that each person may make decisions aligned with their values, medical needs, and circumstances. The Handbook does exactly this: it reports, descriptively, that some participants exercised their right to make a different contraceptive or relational choice after gaining new knowledge.

Far from evidencing bias, the acknowledgment of such feedback demonstrates respect for autonomy and for the diversity of legitimate outcomes that informed choice can produce. What matters is that individuals are empowered to make decisions freely, consciously, and with access to full and accurate information. Reporting that this occurred in practice is entirely consistent with best pedagogical practice.

The Review Report's attention to the statement that Dr. Martínez “advocated for NFP as an effective method for conscious procreation, aligning sexual activity with the fertile phase of the cycle” appears to assume that simply describing a program's positive assessment of Natural Family Planning is somehow improper or ideologically charged. Nothing in the Handbook suggests that.

Further, fertility awareness-based methods are part of mainstream reproductive health education in many countries. They are widely used, medically recognized, and researched within European academic institutions.

Deliverable D9: Training Program and Methodology

According to the Grant Agreement, Deliverable D9 is defined as a “Training program and methodology for informing and educating girls and young women on women's mental

and reproductive health and rights.” It is part of Work Package 2 of the WHGD project, which aims to strengthen the capacity of youth workers and create a structured, evidence-based educational curriculum to be implemented across the consortium’s partner countries.

The Grant Agreement does not prescribe a specific ideological framework or require alignment with any single model of sexuality education. It requires that the material must address women’s mental and reproductive health, be educational in nature, and be implemented in line with Article 14’s general obligations to respect human dignity, non-discrimination, and EU values.

The deliverable itself fulfils this mandate precisely. The “Training Program and Methodology” document presents a structured curriculum consisting of fifteen comprehensive modules addressing the core themes identified in the Description of the Action: reproductive health literacy, anatomy and physiology, sexually transmitted infections, reproductive rights under EU and international law, informed choice, access to health care across EU countries, mental health, menopause, family planning and infertility services, gender equality, and a detailed review of contraceptive methods and their mechanisms. The document is methodological as well as educational, providing learning objectives, pedagogical approaches, suggested activities, and guidance for implementation by youth workers. It is built to be adaptable to different national contexts, in line with the cross-cultural nature of the consortium described in Annex 1 of the Grant Agreement.

In contrast, the Review Report presents a reductive interpretation of this deliverable. Rather than evaluating the full structure of the curriculum, the reviewers fixate almost exclusively on the fact that the program includes informed consent regarding fertility education, and clinical applications for medical care to treat underlying and root cause symptoms. The Review Report characterizes the deliverable as “one sided” or “biased,” not because it omits contraceptive information, but because it includes material that the experts personally consider outside of a preferred sexual education model. It is important to stress that the Review Report does not claim that the curriculum omits hormonal contraception or standard methods; rather, it assumes that the mere presence of alternative approaches is incompatible with “comprehensive” education. This is a substantive mischaracterization of what the deliverable is and what it is contractually obligated to contain.

Discussing the side effects of hormonal contraception, or presenting alternatives such as fertility awareness methods or behavioral approaches, does not constitute misinformation. These are legitimate components of reproductive health education and are included in many public health curricula across the EU. Presenting the full range of

available options, their benefits, limitations, and potential risks is part of delivering balanced and evidence-based education. It allows young women (and men) to understand not only commonly promoted medical choices but also approaches that may align better with their personal, cultural, medical, or psycho-social circumstances.

The standard of care in reproductive health is shifting. As the evidence base grows, educational and clinical care must change to address research advances, knowledge, and technologies. The deliverable emphasized these advances in reproductive health, which empower women to understand their bodies and health, to identify normal and abnormal hormonal changes, to understand the link between hormones and health, including mental health, and to have the knowledge to seek medical doctors and care who can diagnose and treat underlying hormonal imbalances in order to restore health. Providing such knowledge is part of informed consent. Moreover, our approach is inclusive, ensuring that the most up-to-date science can be accessed and provided to all, women and men alike, migrants and refugees, single women (emphasized within the report for no understandable reason), and women of every age and walk of life. We offer a broader set of tools for understanding reproductive health, which is consistent with the project's stated goals of increasing health literacy and informed decision making. To characterize such inclusion as a form of disinformation is to conflate scientific completeness with ideological deviation.

A careful reading of the curriculum shows this claim of disinformation to be unfounded. The modules present hormonal contraception, its mechanisms, efficacy rates, side effects, and clinical considerations. They also explain non hormonal methods, fertility awareness methodologies, medical approaches that diagnose and treat root cause hormone imbalances, and behavioral options such as abstinence and adoption. The curriculum therefore expands the range of information available to youth workers and young women rather than narrowing it. Presenting multiple approaches is fully consistent with educational pluralism and with the project's stated aim to develop "innovative training programs" offering "reliable information" and "holistic perspectives on reproductive health".

The Review Report's objection that the inclusion of alternatives to hormonal contraception is "ideological" overlooks the fact that fertility awareness-based methods and diagnostic techniques are recognized, medically valid, and widely practiced throughout Europe. These approaches are not prohibited anywhere in the Grant Agreement, nor in EU law. Nothing in Article 14 requires the beneficiary to promote only one public health framework or to omit approaches that do not align with specific non-binding resolutions cited by the reviewers.

The Review Report further criticizes the deliverable for not including content related to sexual orientation or LGBTIQ+ issues. Yet this criticism again imposes expectations that do not exist in the Grant Agreement. The project is focused specifically on women's mental and reproductive health. It is not designed as a universal sexuality education program addressing all possible audiences, issues or categories. The absence of certain content is not an omission; it reflects the project's defined thematic scope. Evaluating the deliverable against criteria outside the Grant Agreement exceeds the bounds of contractual review.

The Review Report raises two further criticisms regarding the thematic scope of the curriculum: first, that abortion appears only once in a legal context and is not the subject of a dedicated lesson; and second, that gender is presented in a binary way without reference to LGBTIQ+ persons or single women. Both criticisms misinterpret the scope of the deliverable as defined in the Grant Agreement and misunderstand the nature of the training program itself.

The Review Report notes that the term "abortion" appears only once in Module 5, in the section discussing the legal framework for the right to health in the EU, and concludes from this that the curriculum is incomplete or biased. This conclusion overlooks the purpose of the training program. Within this framework, the curriculum appropriately situates abortion, where it is one aspect and is legislated differently across Member States in the EU.

The absence of a dedicated lesson on abortion is therefore not an omission, but a reflection of the educational - and inclusive - intent of the program. The training program focuses on equipping youth workers with skills in literacy, physiology, mental health, and informed decision making, all of which are neutral, non-political components of reproductive health education. Abortion is not listed anywhere in the Work Package description or in the objectives of D2.2 as a required topic, and no part of the Grant Agreement mandates a full instructional module on it. The curriculum includes accurate references where relevant, in compliance with Article 14 and with the requirement that project outputs remain aligned with the project description.

To demand extended treatment of abortion where the Grant Agreement does not require it would be to impose additional conditions retroactively. The curriculum's approach therefore remains legally and pedagogically adequate.

The Review Report further criticizes the curriculum for referring to gender in binary terms, noting that it speaks of "women" and "men" and does not include explicit content on LGBTIQ+ persons or on the reproductive rights of single women. This criticism misunderstands both the legal framework governing EU values and the scope of the

project itself. Article 2 TEU, which is the Treaty provision defining EU values, explicitly identifies “equality between women and men” as the relevant expression of gender equality within EU primary law. The language used in the curriculum therefore aligns precisely with the terminology employed by the Treaties and reflects the legally defined scope of gender equality in EU foundational principles. Furthermore, the Review Report criticisms regarding “single women” are both absurd and derogatory. “Single women” are not a class to be identified for different educational or biological/medical treatment. Their rights to informed consent, information, and the highest attainable health and medical care are the same as all women, and are recognized fully in the deliverables of this grant.

The WHGD project is focused on women’s mental and reproductive health, with a particular emphasis on young women facing disadvantages, including migrants and refugees, as set out in the Description of the Action and Annex 1. It is therefore both appropriate and compliant with the Grant Agreement that the curriculum refers to women and men in the way that EU law itself does.

When read in full, the “Training Program and Methodology” is a comprehensive, scientifically grounded, and pedagogically coherent resource. It aligns precisely with what the Grant Agreement requires: an educational program addressing women’s mental and reproductive health and rights, incorporating multiple dimensions of health literacy, and providing youth workers with tools to deliver informed, context sensitive sessions. The Review Report’s objections rest on a selective interpretation of the curriculum and on criteria that were never included in the contractual obligations of the project.

Deliverable D10: 10 Blog posts / Op-eds

The Review Report raises several concerns regarding WYA blog posts addressing topics such as surrogacy, contraception, assisted reproduction, abortion, population policy, the family, and HIV/AIDS prevention. These comments require clarification, both in terms of substance and in relation to what the Grant Agreement actually regulates:

Surrogacy and the Casablanca Declaration

The Review notes that a WYA blog post references the Casablanca Declaration calling for the abolition of all forms of surrogacy, and that the post does not present opposing arguments. The implication appears to be that holding or expressing a position opposing surrogacy is itself problematic.

Surrogacy is one of the most ethically contested issues in contemporary bioethics, involving questions of exploitation of women and commodification of children. The Casablanca Declaration (2023) is a civil-society document endorsed by academics, jurists,

and human-rights practitioners from many countries who argue that surrogacy violates the dignity of women and children. WYA's alignment with this view reflects a legitimate ethical position. There is no requirement in EU law or in Article 14 of the Grant Agreement that civil-society actors present every philosophical viewpoint when articulating their own. Freedom of thought and expression (Articles 10–11 of the Charter) explicitly protects the right of associations to advocate for particular ethical positions.

The Review's comment regarding WYAE's position on surrogacy overlooks the fact that the concerns expressed in the referenced blog post are fully aligned with positions in both the European Union and the United Nations. Given the Agency's appreciation for non-binding EU documents, we wish to reference recent and related EU political statements regarding surrogacy.

In the European Parliament resolution of 21 January 2021 on the EU Strategy for Gender Equality (2019/2169(INI)), the European Parliament stated that the "sexual exploitation for surrogacy and reproductive purposes [...] is unacceptable and a violation of human dignity and human rights." It reinforced this view in its Resolution of 23 October 2025 on the Gender Equality Strategy 2025-2030, where it explicitly "condemns all forms of surrogacy, which involve the reproductive exploitation and use of women's bodies for financial or other gain, in particular in the case of especially vulnerable women in third countries." Similarly, the United Nations Special Rapporteur on violence against women and girls has affirmed these concerns. In her press statement of 29 October 2025, 'UN expert calls for recognition of surrogacy as a system of violence, exploitation and abuse' (OHCHR), Reem Alsalem emphasized that surrogacy arrangements frequently subject women to "physical, psychological, economic and reproductive violence."

International Children's Day and the Context of Abortion

The Review states that a WYA blog "explicitly associated abortion with coercive population-control policies" and "none of the other reasons why women might need access to abortion services are mentioned."

The cited post discusses a documented reality: that in certain countries, most notably in parts of Asia during the late twentieth century, forced abortion formed part of coercive population-control regimes. Highlighting a specific historical abuse does not imply that this is the only context in which abortion occurs, nor does it deny that women face a range of complex personal and medical situations. The post addresses one important dimension relevant to the day's theme, which is entirely appropriate for such a commemorative communication.

International Day for the Eradication of Poverty and Population Policy

The Review objects that WYA criticized UN approaches that link poverty reduction to population-control strategies and states that the blog post lacked references.

WYA's position reflects a long-standing critique shared by many development economists: that reducing fertility rates through population-control policies is not a substitute for economic and social development, education, infrastructure, or the empowerment of women. This critique is present in the work of Amartya Sen, Esther Duflo, and numerous other highly respectable scholars. It is therefore a legitimate development-policy perspective. WYA's opposition to population control as an approach to eradicating poverty is long-held and well-known. To review our full position, including references and citations, please read the following white papers on our website (wya.net/white-papers/): EU Development Aid and Coercive Practices, Sustainable Development, Family Planning, Reproductive Health. Additionally, we wish to reiterate that the development of these white papers and related research, citations, and fact sheets, took place outside of this operating grant, as they were completed and posted on our website long before this grant application.

International Family Day and the 2004 Declaration on the Family

The Review appears particularly concerned about this blog post, and the inclusion of a link to the WYA Brussels Declaration on the Family.

The WYA Brussels Declaration on the Family (2004) affirms two propositions: that mothers and fathers have complementary roles, and that family membership begins at conception. Neither statement constitutes discrimination, and EU member states reflect these propositions in varied ways through their national laws. The statement that family membership begins at conception is a central scientific fact: human development begins at conception (fertilization).

The content is non-discriminatory and entirely protected under EU fundamental-rights law. The link to the WYA Brussels Declaration on the Family is another instance of a youth-led, youth initiative in its writing and execution. In 2004, young members of WYAE initiated a bike ride across Europe to mark the celebration of the year of the family. In Brussels, the Declaration on the Family was the output of their intellectual deliberations. WYAE young participants evidently found that key ideas from the 2004 declaration resonated with ideas they wished to express in their blog 20 years later. This is evidence of youth impact, and should be celebrated as such.

World AIDS Day and HIV Prevention

The Review objects that a WYA LinkedIn post emphasized behavioral prevention, delay of sexual debut and reducing the number of concurrent partners, without explicitly discussing condoms.

Behavioral strategies are a central pillar of HIV prevention, and it is an established fact that age at sexual debut and high partner concurrency significantly increase HIV vulnerability. There is nothing medically inaccurate in highlighting the effectiveness of behavioral prevention; rather, this represents significant scientific consensus.

It is not necessary to discuss condom use in every blog post on the topic of HIV/AIDS, and the omission of a discussion regarding condom use from one short blog post is not misinformation. Nothing in the post contradicts scientific evidence or recognized EU values.

WYAE blogs were written by the young members of the organization. The blogs represent their ideas and perspectives, and are a tangible representation of the engagement, inclusion, and democratic participation of young people in this project and within WYAE generally. Open debate, intercultural dialogue, and respect for the dignity of every human person are values of the WYAE, as well as values held by the European Union. Appropriate, considered, open discussion representing differing viewpoints is a strength in a pluralistic, democratic society. The Review seems to suggest that opinions represented in the WYAE blogs are somehow threatening; it is clear reviewers disagree. So be it. Free societies engage in discussion, debate and the contest of ideas in the public square. WYAE is proud to participate. We suggest the job of the Agency is to review appropriate completion of grant activities, rather than police ideological alignment with reviewers within the Erasmus+ grants.

Alleged omission of positions at application stage

The Review Report suggests that WYAE failed to disclose “key aspects” of its wider positions during the application phase, naming our views on abortion, comprehensive sexuality education, family planning, or the fundamental idea that life begins at conception. 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 WYAE 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 Operating Grant 2024 would implement. Those activities were carried out in accordance with the Grant Agreement in full.

Conclusion

The Review Report does not dispute that WYAE delivered the 2024 work programme as described in Annex 1. It identifies no shortcomings in the implementation of activities, no inaccuracies in project deliverables, and no instance of discrimination, exclusion, or misinformation in any funded output. Instead, the Review focuses on positions contained in long-standing WYA publications, blog posts, and white papers that were not produced under this operating grant and fall entirely outside the contractual scope of project 101161773.

Disagreement with non-binding policy 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.

In addition, EU primary law explicitly preserves space for national and cultural diversity in ethically sensitive domains, including family policy, education, and aspects of reproductive health. Member States retain broad competence in these areas, and the Treaties deliberately refrain from imposing a single philosophical or pedagogical model. An operating grant cannot be used, either directly or indirectly, to standardise ethical frameworks among civil-society organisations or to require conformity with non-binding

political resolutions. Applying such documents as compliance benchmarks would undermine the principles of legal certainty, proportionality, and legitimate expectations.

Furthermore, the Charter protects not only freedom of expression but also the independence of civil-society organisations and the freedom of the arts and sciences (Article 13). These protections guarantee that research-based, philosophical, or educational positions may be developed and disseminated without being subject to ideological approval. Operating grants support the functioning of independent organisations; they do not and cannot condition funding on the adoption of particular ethical viewpoints or political narratives.

WYAE's 2024 work programme was designed and implemented by young people, was open to all participants, and promoted dialogue, inclusion, education, civic engagement, and human dignity. It met all obligations under Annex 1 and Article 14. No evidence has been presented to suggest otherwise. Therefore, we maintain that Operating Grant 2024 meets the requirements of the Grant Agreement and reflects the diversity of civil society that is indispensable to the way of life within the European Union. We find the present Review to be biased, and the allegation that WYAE in any way breaches basic EU values outrageous and unfounded.

Sincerely,

World Youth Alliance Europe team