

17 November 2025, Brussels

To:

Georg Häusler, Director for Culture, Creativity and Sport, Directorate-General for Education, Youth, Sport and Culture, European Commission

Sophie Beernaerts, Director, European Education and Culture Executive Agency

MEP **Nela Riehl**, Chair, Committee on Culture and Education, European Parliament

MEP **Emma Rafowicz**, Vice-Chair, Committee on Culture and Education, European Parliament, Creative Europe rapporteur

Dear Mr Häusler, Ms Beernaerts, Ms Riehl, and Ms Rafowicz,

We are writing to draw your attention to a systemic problem in the evaluation of the Creative Europe – European Cooperation Projects 2025 ([CREA-CULT-2025-COOP](#)) call, the results of which were published on 12 November 2025.

A significant number of proposals were downgraded and subsequently deemed ineligible because some organisations in the consortia were listed as partners or associated partners in more than three applications **without their knowledge or consent**.

We believe this situation occurred due to a loophole in the Funding & Tenders Portal, which currently allows any applicant to add an organisation to proposals without its explicit consent and without any reliable and explicit verification, confirmation or notification mechanism linked to the organisation's PIC (Participant Identification Code).

Culture Action Europe has so far collected evidence of at least 30 unique project applications impacted, affecting more than one hundred organisations across Europe. These are not isolated incidents but a systemic failure with concrete consequences: compliant organisations and high-quality applications were excluded from fair competition through no fault of their own.

While the [call document](#) states that *'project coordinators and partners are responsible for ensuring that none of the members of their consortia participates in more than three applications,'* the three-application cap, as currently implemented, places full responsibility on applicants **while providing no explicit technical means to fulfil this obligation**. Rather than ensuring equal treatment, the cap has undermined it penalising organisations acting in good faith.

The Funding & Tenders Portal offers no mechanisms requiring an organisation's explicit confirmation before being added as a partner to a project proposal. In practice, notifications rely not on the organisation's PIC but on an email address entered by a third party, which enables errors or abuse. As a result, organisations can unknowingly be added to multiple proposals while bearing the full consequences of sanctions.

This design has created precedents of arbitrary exclusion and raised concerns regarding the implementation of the principles outlined in the EU Financial Regulation (proportionality, equal treatment, sound financial management, and good administration) which should guide all EU funding procedures.

In light of the above, we request that the European Commission and the European Education and Culture Executive Agency:

1. Re-evaluate all proposals of the CREA-CULT-2025-COOP call downgraded and rejected due to partners appearing in more than three applications without their prior consent or proper notification to the PIC holder.

2. Implement safeguards for future calls, including:

- requiring explicit partner consent (e.g., a signed letter of intent or digital approval) before any organisation can be added to an application;
- automatic notification to PIC holders whenever their organisation is added to a proposal, with mandatory confirmation before submission.

It's worth noting that Erasmus+ already mitigates these risks by requiring formal partner consent before submission. Adopting these safeguards in Creative Europe would make an application cap workable and fair.

We also ask the European Parliament to take this issue into account in its oversight and evaluation of Creative Europe implementation.

The credibility of Creative Europe and the trust of the sector depend on a transparent, fair, and administratively sound evaluation process. Without such safeguards, situations like the current one risk creating tensions within consortia and across the sector, fostering blame, exposing partners to potential legal disputes, and pitting organisations against each other, ultimately weakening the collaborative spirit that underpins the sector.

It must be ensured that organisations who invest a lot of hard work and resources into the preparation of applications are not put at risk by technical loopholes outside their control.

We remain at your disposal for further discussion and are ready to contribute to solutions that will strengthen the programme for all participants.

Kind regards,

Lars Ebert
Secretary-General