



European Commission
Commissioner Věra Jourová
B-1049 Brussels

Brussels, 19 July 2018

European Values Instrument – response to your letter (EF/ps/A(18)2716950 – D(18))

Dear Commissioner Jourová,

Thank you very much for your response of 28 June 2018 concerning the European Value Instrument (EF/ps/A(18)2716950 – D(18)).

We are pleased to see that your letter stresses the clear commitment of the European Commission to ensuring the existence of a strong, free and vibrant civil society in the EU and in all Member States. Taking this into account, we would like to comment on the European Commission draft proposal for a Regulation on the “Rights and Values Programme” as part of the Multiannual Financial Framework (MFF) for 2021-2027 as follows:

While we welcome aspects of the proposal, we would like to suggest that some attention be paid to the volume of funding earmarked for the promotion of human rights, democracy and European values on the grass-roots level. Given the current existing instruments (Europe for Citizens; Rights, Equality and Citizenship Programme), surely a stronger approach is mandatory. We have three suggestions in this regard:

1. A different budget size

First, the proposed seven-year budget of €642 million (divided into €409 million for the “Equality and Rights” and €233 million for the “Citizens engagement and participation” strands) does not appear sufficient to address the mounting challenges to European values. This is merely a slight increase to the budgetary period of 2014-2020 where two programmes, once merged into the new instrument, had a joint budget of €624 million (Rights, Equality and Citizenship Programme: €439 million; Europe for Citizens: €185 million). We urge for this budget to be raised. As stated in our previous letter, we are convinced that raising the amount to at least the level of funding available for countries outside the EU, i.e. €2 billion in the seven-year budgetary perspective, is necessary.

Moreover the proposal foresees spending the budget on a vast set of beneficiaries including entities in third countries (accession candidates and European Neighbourhood Policy participants), international organisations, member state governments and “any legal entity under Union law”. The portion dedicated specifically to Civil Society Organisations comprises just €46.6 million and our concern is that on one hand this is too little and on the other that there is not enough funding going to the grass-roots level for the funding the promotion of European values within the EU itself.

2. Thematic focus

Second, the “Citizens engagement” strand will focus on promoting “exchange and cooperation between citizens of different countries” and “citizens’ civic and democratic participation (...) in all areas of Union action” (Article 4). This suggests that the substantive scope of the programme will support activities covering EU law and policy or certain activities at EU and transnational level. Funding is however also

urgently needed to be targeted towards Civil Society Organisations working on local projects and for those in the area of European values formulated in Article 2 of the EU Treaty but not falling under Union action.

It would be possible for example, to make this explicit by adding to Article 2(2) (Programme objectives): “(b) to promote citizens’ engagement and participation in the democratic life of the Union (Citizens’ engagement and participation strand) **at local, regional, national and transnational levels**”. And adding to Article 2 the following objective: “**(d) to foster and support the creation of a healthy and sustainable CSO sector at national and local level with the capacity to fulfil its role in safeguarding these values**”.

3. Simplified access to funding

Third, access to funds for Civil Society Organisations could be further simplified. Present EU rules on minimum turnover rates, pre-financing and mandatory monetary co-funding make it hard or even impossible for smaller grass-roots Civil Society Organisations to access EU funds. One step in this direction could be to maintain under the new programme the application and reporting structure of the Europe for Citizens programme, which requires less administrative burden and is more accessible to beneficiaries. The administrative burden on grantees could be reduced further if funds were distributed through independent fund operators, similar to NGO programmes of EEA/Norway Grants.

For a more detailed analysis, please see the opinion done by Stefan Batory Foundation here <http://www.batory.org.pl/upload/files/Programy%20operacyjne/Forum%20Idei/Stefan%20Batory%20Foundation%20Opinion%20on%20Rights%20and%20Values%20Programme-4.pdf>.

The EFC (www.efc.be) and DAFNE (www.dafne-online.eu) represent Europe’s institutional philanthropy sector with a collective membership of some 10,000 foundations and donor organisations.

We look forward to discussing these issues further with you and would like to suggest a meeting in the near future to do so.

Yours sincerely,



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