

16 February 2021

Věra Jourová
Vice-President for Values and Transparency
European Commission
Rue de la Loi, 200
B-1049 Brussels

Subject: Suggestions of civil society organisations as regards implementation of the Citizens, Equality, Rights and Values (CERV) programme

Dear Vice-President Věra Jourová,

Civil society organisations across the EU have long advocated for greater and more accessible European financial support for projects fostering European values at the local, national and transnational levels. This is why, as members of the civil society, we welcome the unprecedented decision of the EU Council and the European Parliament to allocate over 1.5 billion EUR for the Citizens, Equality, Rights and Values (CERV) programme under the 2021-2027 Multiannual Financial Framework.

We highly appreciate that the draft regulation on CERV programme clearly stresses the importance of funds' accessibility to civil society actors, including grassroots CSOs, who address challenges to European values locally. We are also glad that emphasis has been put on flexible support to CSOs which foster democracy, the rule of law and fundamental rights, as reflected by the creation of the new 'Union values' strand (Article 2 of the draft regulation).

We warmly welcome the commitment to implement the Programme in a "user-friendly way", and we can only agree with the statement that "particular attention should be paid to accessibility [of the CERV programme] to civil society organisations at transnational, national, regional and local level, including local grass root civil society organisations as well as to the capacity of beneficiaries [which] should include consideration of the use of financial support to third parties, where appropriate" (Recital 18).

Expectations are high and we understand that full and effective implementation of this ambitious Programme will be challenging. In this context, we express regret over the fact that the Commission has not organised a consultation with CSOs on the implementation of the Programme, particularly in the context of the preparations of the 2021 Annual Work Programme. We do encourage the Commission to do so for the rest of the programming period.

Indeed, drawing on our vast experience in promoting and protecting European values as civil society actors, and our experience related to various grant programs for civil society

financed by private, public and intergovernmental entities , we wish to make a number of recommendations in the interest of maximising the CERV Programme's accessibility and effectiveness.

1. A significant part of CERV funds should be distributed via national or regional intermediaries (grant programme operators) or consortia of several intermediaries. Intermediaries should be selected from among individual civil society organisations, networks or consortia in an open, transparent and competitive procedure based on their earlier experience, independence and engagement with civil society, as well as with grant programmes.
2. The Programme should strengthen national networks and associations of grassroots CSOs to boost resilience of the civil society sector.
3. Financing projects aimed at promoting and safeguarding EU values, including through awareness raising and educational activities, is more important than ever. However, for CSOs to have the capacity and resources to engage in such activities, it is crucial for the Programme to also provide core funding to support CSOs own existence and operations, in particular for organisations which operate on local or national level. It should also help build capacity of CSOs, as well as support their institutional development and resilience.
4. National and cross-border partnerships of applicants are welcome but should not be preferred to applications submitted by individual CSOs. Applicant organisations should be allowed to partner with informal groups.
5. Grant application and reporting procedures should be user-friendly and accessible to all kinds of eligible civil society actors, including those with limited administrative capacity.
6. Grants should be divided into small, medium and large ones, to enhance access to funding for organizations from different regions with various levels of capacity and experience. Application procedures for small grants should be simplified.
7. The timeframe for the implementation of proposals under action or operating grants should be flexible – for some of the programmatic objectives, the usual timeframe of 2-3 years may not be suitable to build capacity and ensure sustainability of the sector.
8. Application processes should be divided into two stages: (1) submission of a short project concept note and indicative budget; (2) submission of the full project proposal. Between the two stages, CSOs with less capacity should receive assistance (in the form of workshops or consultation provided e.g. by external contractors) in order to enable them to develop their ideas into fully-fledged projects. Submission of formal documents (e.g. issued by tax authorities) should not be required until the signature of contract.
9. The co-funding requirement should be differentially applied depending on the size of projects. Smaller and medium-sized projects implemented by grassroots CSOs should be exempted from the co-funding requirement or it should be reduced to maximum 5%. In-kind and voluntary work should be recognised as an alternative for own financial contribution. Greater use of lump sums should be applied, and more flexibility as regards the use of the budget should be allowed. Beneficiaries should be able to receive funds in their local currency, which would reduce risks related to fluctuation of exchange rates.

10. The disbursement system of the grants should not undermine cash flow of grant beneficiaries. Beneficiaries should not be expected to pre-finance the implementation of projects. A new instalment should be disbursed when 70% of the previous instalment has been used up.
11. All information and procedures related to the Programme, including application forms, instructions for applicants and Q&As should be available in all official EU languages. Application forms and other key documents should be accepted in all official languages of the EU. The Commission should organise webinars in local languages for potential applicants to provide orientation on the Programme.
12. A Programme Council should be set up as the highest decision-making authority of the Programme. Civil society organisations, appointed in consultation with European networks of CSOs or with national associations of CSOs, should take part in the Council and participate in the oversight of the implementation of the Programme.
13. Independent experts, with expertise and proven knowledge of the sector, appointed in consultation with European networks of CSOs or with national associations of CSOs, should take part in the assessment of grant applications (potential conflicts of interest must be avoided).
14. The Commission should organize information campaigns on the CERV Programme in EU member states in partnership with local CSOs and Programme operators (rather than PR companies).

We hope these suggestions can prove useful in developing work programmes and calls for proposals so that the Programme can give effective support to CSOs against the background of the current challenges they face across the EU. We also highly recommend the [Good Grantmaking Guide](#), that summarises the experience of Central European grant-making foundations under the umbrella of the Environmental Partnership Association.

We remain ready and open to consult with you through any means about the possible design and modalities of the Programme setup.

Yours sincerely,

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