

Opinion of the European Economic and Social Committee on the ‘Proposal for a Council Regulation establishing for the period 2014-2020 the programme “Europe for Citizens”’

COM(2011) 884 final — 2011/0436 (APP)

(2012/C 299/22)

Rapporteur: **Mr GOBIŇŠ**

On 19 March 2012 the European Commission decided to consult the European Economic and Social Committee, under Article 304 of the Treaty on the Functioning of the European Union, on the

Proposal for a Council Regulation establishing for the period 2014-2020 the programme "Europe for Citizens"

COM(2011) 884 final — 2011/0436 (APP).

The Section for Employment, Social Affairs and Citizenship, which was responsible for preparing the Committee's work on the subject, adopted its opinion on 27 June 2012.

At its 482nd plenary session, held on 11 and 12 July 2012 (meeting of 11 July), the European Economic and Social Committee adopted the following opinion by 140 votes to 1 with 5 abstentions.

1. Conclusions and recommendations

1.1 The European Economic and Social Committee (EESC) strongly supports pressing ahead with the Europe for Citizens programme and its key elements of encouraging and facilitating the active participation of citizens in political and public life and mutual solidarity and cooperation based on shared values and a European identity.

1.2 Active citizenship includes involving individual citizens, citizens' groups and civil society organisations, particularly the social partners, in drawing up policy (vertical dialogue between civil society and public administrations) and ensuring networking and cooperation between them (horizontal dialogue). The EESC welcomes the fact that the proposal under consideration envisages support for both aspects, although the arrangements for horizontal dialogue need to be further clarified.

1.3 The EESC broadly endorses the European Commission's proposal, but calls for the European Parliament, the European Economic and Social Committee, the Committee of the Regions and the partners in the structured dialogue to be more involved in framing, monitoring and evaluating the programme. The present opinion sets out recommendations and specific changes that will allow the programme to be improved by bringing it still closer to citizens and better meeting their needs.

1.4 As also acknowledged by the European Commission, the institutions of the European Union are currently experiencing a grave problem of legitimacy. The public's low level of confidence, apathy and the lack of involvement in the decision-making process are fundamentally detrimental to the spirit of the EU and impair the quality of decisions and the

Union's long-term development⁽¹⁾. This affects public administration at all levels: local, national, transnational and European. The financial framework proposed for the programme for carrying out the necessary work is insufficient, and everything possible should therefore be done to increase this funding.

1.5 The Europe for Citizens programme must comply with the democratic norms set out in the Lisbon Treaty and support them in becoming more firmly anchored in Europe, especially where the mechanisms for participation and transparency provided for in Articles 10 and 11 of the Treaty on European Union (TEU) are concerned. However, it will only be possible for the programme to be fully operational if the EU institutions shoulder their obligations to implement these articles, in particular by drafting green papers. Similarly, the programme must not in any way divest the European Commission's various directorates-general of their responsibility, using their own financial and other resources, to provide greater support than so far, in their areas of responsibility, for public participation, dialogue and partnerships.

1.6 The EESC is also aware of the fears expressed by many civil society organisations that the annual work programmes may weaken the programme's focus on long-term issues or even obscure them completely, and/or remove the possibility for citizens to decide their own priorities. The Committee shares these concerns.

1.7 The programme's strand on remembrance should promote a common identity and values. The EESC welcomes the additional provisions proposed in the programme, which

⁽¹⁾ OJ C 181, 21.6.2012, pp. 137-142.

also cover commemoration of the victims of Nazism and of the totalitarian Communist regime, including after 1953, and the importance of the role played by society in reuniting a Europe that was so long divided.

1.8 The EESC emphasises the need to support civic participation that is sustainable, substantial and as structured as possible at all levels, and at every stage of the decision-making process.

In addition to the suggestions mentioned above, it therefore makes the following proposals:

- Priority should be given to grants to support structural change, participation and the use of institutional memory, and care must be taken to ensure that there is no interruption in the programme between the current and following budget periods. If necessary, a transitional period should be introduced to guarantee that objectives are met during this interval.
- The programme's main selection criteria must be based on the European dimension and public involvement in EU-related issues, and not on implementation at European level. There should also be an option to allocate grants for national-level participation in the EU decision-making process.
- Representatives of the EESC, the Committee of the Regions and the partners in the structured dialogue should also be involved in the programme's steering group, and project management should be simplified, especially the evaluation arrangements, while retaining the necessary control.
- Voluntary work should be recognised as co-financing. Special support or a separate category should be provided for small-scale projects in Member States where conditions are particularly unfavourable in areas relevant to the civil society involvement objective of the programme, or in which participation is low.
- Where the applicant proposing a project is a public administration, an agency or any other body which is mainly funded by taxes, levies or similar payments, partnership with at least one civil society organisation should be compulsory. East-West cooperation in particular should be encouraged, in the form of either town-twinning or other projects.

2. General comments – content of the programme

2.1 The Europe for Citizens programme must give practical effect to the democratic norms set out in the Lisbon Treaty, and

particularly Articles 10 and 11 TEU. The European Citizens' Initiative is only one possibility for participation provided for in the Treaty; others should follow rapidly. This programme will also bear fruit if the EU responds better to the policy requirements set out in detail in other EESC opinions including, crucially, the preparation of green papers on civic participation.

2.2 The sole legal basis for the proposal that is explicitly cited at present is Article 352 of the Treaty on the Functioning of the European Union (TFEU) ⁽²⁾. The EESC calls for the treaty articles laying down the objectives that are to be met by the programme to be spelled out. Articles 10 and 11 TEU and Article 15 TFEU ⁽³⁾ should be specifically highlighted. Article 39 of the Charter of Fundamental Rights, which concerns the right to vote and to stand as a candidate at elections to the European Parliament, is indeed mentioned in the explanatory memorandum, but there is no reference to other relevant Charter articles such as Article 11 (freedom of expression and information), Article 12 (freedom of assembly and of association), Article 41 (right to good administration) or Articles 20 to 26 which, *inter alia*, establish equal rights for persons and different groups in society and the protection of these rights ⁽⁴⁾. It should be stated, however, that the programme cannot be the sole or main instrument for achieving the aims referred to above.

2.3 The EESC emphasises that participation and active citizenship represent a universal and indivisible value, and that all levels of public administration (local, national and European) are interconnected. Many EU-related decisions have repercussions at the local and national levels. These are also the levels that promote EU decisions and help to prepare them. The programme must reflect this state of affairs, and the resources needed for this purpose must be found. The European dimension must remain the priority, regardless of the level at which the project-promoter operates (national or European). Projects of this kind should also be possible without transnational partners. Support should furthermore be given, in the form of increased funding, to locally-operating promoters of projects involving participation in EU decision-making.

2.4 The Committee notes that the work done by civil society organisations is of particular importance, especially at a time of crisis, and that the crisis, together with the lack of available resources, has often seriously affected this work. The long-term administrative grants planned in the programme therefore have an especially important part to play, as does support for the structured dialogue and for watchdog bodies, as well as involvement in addressing current EU issues. The programme should, among other things, support the measures carried out, the knowledge gained and the results achieved in the 2011 to 2013 European thematic years, in addition to the recommendations of civil society, *inter alia* those made by the social partners.

⁽²⁾ COM(2011) 884 final.

⁽³⁾ OJ C 83, 30.3.2010.

⁽⁴⁾ OJ C 83, 30.3.2010.

2.5 Active citizenship and civic participation are logically linked to activities that foster exchanges of information and ideas as well as reflection on a common identity, values and history. The EESC welcomes proposed expansion within the programme of the strand on remembrance to cover commemoration of the victims of Nazism and of the totalitarian Communist regime, including after 1953. Support should also be given to a public debate promoting a deeper understanding of – and drawing lessons from – the history of Europe, highlighting the importance of society in reuniting a Europe that was so long divided. Special attention should be given to young people's historical awareness, which represents the cornerstone of the EU's shared future, freedom and prosperity.

2.6 The EESC stresses the need for the broader involvement of citizens rather than only officials from institutions, in projects and activities developed under the Europe for Citizens programme, especially town-twinning. Where the applicant proposing a project is a public administration, an agency or any other body which is mainly funded by taxes, levies or similar payments, partnership with at least one civil society organisation should be compulsory. Special support should be allocated to developing new partnerships, such as the East-West Partnership.

3. Specific comments

Coordinating Europe for Citizens with other programmes

3.1 The EESC welcomes the changes made to the initial proposal, providing for improved cooperation and coordination between Europe for Citizens and other EU programmes, relating in particular to neighbourhood policy. Under Article 11 of the proposal, and with a view to achieving the 2020 objectives, there is also a need for better coordination with INTERREG, and programmes focusing on media and youth.

3.2 The EESC advocates working without delay in order to provide coordinated information on Europe for Citizens and other EU programmes, so that every citizen can discover all the opportunities available to him or her, on a single site. It emerged from a public consultation⁽⁵⁾ carried out by the Commission that people are not always aware of which programmes generally support which type of activity. There should be a special focus on young people.

3.3 As it has done in a previous opinion, the Committee calls for meaningful improvement of coordination by, for example, establishing a permanent inter-institutional unit for active citizenship and participation issues, bringing together representatives of the European Commission's different directorates-general and of the other EU institutions⁽⁶⁾.

⁽⁵⁾ Results of the on-line consultation carried out by the European Commission (2010-2011).

⁽⁶⁾ OJ C 28, 3.2.2006, pp. 29–34.

Financial aspects

3.4 The programme's funding is entirely insufficient. The Committee is aware that given the current crisis, increasing the budget of the Europe for Citizens programme would be a financial and political challenge. It stresses, however, that the programme is vitally important and suggests that its funding should, in principle, be increased several times over. The funding is not currently sufficient to achieve tangible results at the European level⁽⁷⁾, and fails even to meet the expectations of potential project-promoters. The present level of funding raises issues regarding the importance given to public involvement in decision-making and of decision-makers' ability to honour their commitments to implement the Lisbon Treaty.

3.5 The Committee calls for reflection on how to allocate additional resources to Europe for Citizens, especially resources not used during the programming period under other programmes.

3.6 In order to ensure broad and inclusive participation in the programme and not to discriminate against organisations that are small or have few financial resources, and in order to enhance the effectiveness and visibility of the programme within Europe, the EESC considers that small-scale projects that have a European dimension should also be supported. With regard to the current programme, where civil society projects in particular are concerned, the threshold for their budgets and volume of co-financing should be lowered, pre-financing stepped up, the requirement to cooperate with a foreign partner removed, and the administrative burden reduced, while retaining the necessary control where needed. In the programme's next period, citizens' and civil society organisations must be able to submit applications for small-scale grants, so that they no longer have themselves to invest several tens of thousands of euros in co-financing. The average amount allocated per project at present, which is EUR 80 000, is giving rise to concern. When planning the programme, other aspects under which the programme's provisions could discriminate against certain project promoters or target groups, should be carefully assessed and eliminated.

3.7 The EESC calls on the European Commission to consider how to give specific support to, or create a separate category for small-scale projects in those Member States where the work of civil society organisations in areas relevant to the programme's objective is especially disadvantaged or where participation is low.

3.8 Ways must be found in the new programming period for voluntary work to be counted as eligible in terms of co-financing⁽⁸⁾.

⁽⁷⁾ Cf. footnote 6.

⁽⁸⁾ OJ C 325, 30.12.2006, pp. 46-52.

3.9 Strengthening civic action and values among the new generation of Europeans represents a crucial challenge and duty for the future of the EU. The EESC proposes that the European Commission examine the possibility of including more youth projects that are not conducted under the Erasmus for All programme within Europe for Citizens, particularly projects developed under the Youth Initiatives. Projects aimed at promoting corporate social responsibility could form another thematic strand.

Management and administration of the programme

3.10 Programme administration should be decentralised, especially for the small-scale projects mentioned in point 3.6. The Commission has already undertaken to involve the Commission Representations in the Member States to the greatest extent possible in popularising the programme⁽⁹⁾, but options should also be explored for broadening the use of the Representations or other national-level structures, including for the management of different aspects of the programme. Keeping the public informed and programme administration are complementary activities. Another solution might be to implement a number of small projects by using global grants.

3.11 The administration of the programme must be completely open and transparent. The EESC welcomes the consultations that the European Commission is already conducting within the framework of the programme. However, in view of the particular nature of the programme, it should be made possible for representatives of the Committee of the Regions, the EESC and the partners in the structured dialogue to be involved in the programme's management committee, giving them expert, full member, observer, active observer or similar status, or setting up a formal or non-formal interinstitutional working group to draft the annual programme. An arrangement of this kind would allow the idea of partnership to be put into practice and information to be efficiently exchanged at an early stage of the decision-making process. Moreover, these representatives should be closely involved at every stage of the programme's evaluation and further development⁽¹⁰⁾.

3.12 Civil society has identified risks concerning the work programme's annual priorities, short-term actions or one-off initiatives, which must not be allowed to obscure or unilaterally curtail the programme's basic objectives: these risks should be eliminated. Civil society should be given the option to choose relevant themes for its projects that meet these objectives.

3.13 The EESC stresses that a two-stage project evaluation system should be set up. A vast number of applications are turned down due to insufficient funding. At present, across the programme's different strands, only around one project in twenty receives support. This must not lead to applicant organisations wasting resources, which would be detrimental to them

and run counter to the key objectives pursued. A wider range of deadlines for submitting projects should also be introduced.

3.14 Administrative expenditure seems excessive, accounting for around 11 % of the programme's overall budget: when planning this expenditure, the EESC urges that account be taken of the cost-benefit analysis⁽¹¹⁾ and of the solutions put forward in the present opinion for curtailing these costs, such as global grants and a two-stage evaluation system.

3.15 The EESC calls for contact points for the Europe for Citizens programme to be set up as soon as possible in those Member States where they do not yet exist, and for their activities and visibility to be stepped up.

Effectiveness, sustainability and yield on resources committed

3.16 As both the European Commission and the many civil society representatives it consulted acknowledge⁽¹²⁾, the programme should in the future be much more closely linked to the actual decision-making process and the European political timetable. The EESC welcomes the fact that one of the result criteria included in the new programme is the number and quality of policy initiatives stemming from the activities it supports. The programme is therefore likely to strengthen the implementation of Article 11 TEU. Similarly, the EESC welcomes the Commission's requirement for best practices and ideas to be exchanged with regard to civic participation⁽¹³⁾.

3.17 All measures supported by the programme should achieve results that lend themselves to practical use, are consistent and sustainable and have the highest-possible profile. This must also be ensured when holding debates, conducting short public meetings and establishing reciprocal contacts. Some of the presidency's events, for example, could be transformed into regular forums for discussion between civil society and the EU institutions.

3.18 The EESC is in favour of making operating grants more accessible, putting special emphasis on the European but also the national level, as it is these grants that enable organisations to build up their overall skills, increase their capacity to take part in shaping policies, and react swiftly to new challenges⁽¹⁴⁾. In contrast, project grants ("action grants") are frequently geared to specific initiatives, and it is often more difficult to ensure the

⁽⁹⁾ COM(2011) 884 final.

⁽¹⁰⁾ Cf. footnote 6.

⁽¹¹⁾ Under the European Commission's present proposal, the total 2014-2020 budget for the Europe for Citizens programme stands at EUR 229 million, EUR 206 million of which is to be allocated directly to actions carried out under the programme and EUR 23 million to administrative expenses. See annex to COM(2011) 884 final 2011/0436 (APP).

⁽¹²⁾ Results of the on-line consultation carried out by the European Commission in 2010-2011.

⁽¹³⁾ COM(2011) 884 final.

⁽¹⁴⁾ See also European Parliament, Directorate-General for Internal Policies, Policy Department D: Budgetary Affairs, Financing of Non-governmental Organisations (NGO) from the EU Budget [Study], Provisional Version, 2010.

sustainability, institutional memory and quality of action through such grants. The average amounts, number of projects and other indicators set out in the annex to the present proposal should be checked. These points must not become a source of financial or administrative discrimination against smaller organisations, as a result of applying high thresholds for co-financing or other aspects. It would be more appropriate not to set a minimum amount, or set it at a low level in relation to the volume of these grants, so as to increase the number of beneficiaries and/or the duration of the support granted.

3.19 Extensive use should be made of long-term structural aid for trusted partners. It would also be desirable to extend the maximum duration of projects, when the nature of the project so requires.

4. Additional recommendations to the proposals presented by the European Commission

These amendments express the EESC's point of view on certain key aspects of the programme. In order to take account of the considerations set out in the first section and to ensure the internal consistency of the document, further changes to the content of the proposal, the explanatory memorandum and the annex may be necessary.

4.1 In recital (4) of the preamble, the EESC recommends expanding or removing the sentence "the European Citizens' Initiative provides a unique opportunity to enable citizens to participate directly in shaping the development of EU legislation"⁽¹⁵⁾, as it could raise doubts about the implementation of other provisions of the Lisbon Treaty.

4.2 In recital (4) of the preamble, the EESC advocates replacing the words "a variety of actions and coordinated efforts through transnational and Union level activities are required" with "a variety of actions and coordinated efforts are required through activities at transnational and Union level, and, in keeping with the European dimension, at national level", in accordance with points 2.3 and 3.6 of the present opinion.

4.3 In recital (10) of the preamble, the EESC urges that the word "transnational" be replaced with "the programme's", in accordance with points 2.3 and 3.6 of the present opinion.

4.4 The EESC suggests that the following addition be made to recital (14) of the preamble: "... in cooperation with the Commission, the Member States, the Committee of the Regions, the European Economic and Social Committee, the partners in the structured dialogue and the individual representatives of European civil society ...".

4.5 In recital (16) of the preamble, the EESC suggests replacing the expressions "directly linked to EU policies" and "the shaping of the EU political agenda" with "directly linked to policies on EU questions" and "the shaping of the political agenda concerning EU questions".

4.6 In order to give practical form to the comments made in point 3.13 of the present opinion, the EESC considers that the following should be added to the second sentence of recital (16) of the preamble: ", and by the selection in two stages of proposals for projects".

4.7 The EESC suggests the following amendment to Article 1 of the proposal: global aim -: "promoting European values and identity". The concept of "European values and identity" is broader and more inclusive. These amendments should also be made in other parts of the proposal.

4.8 Furthermore, the EESC recommends that in Article 1, the words "at the Union level" be replaced with "in Union affairs and questions", reflecting the comments made above, in order to assert that civic participation is indivisible and that EU-related affairs are not decided at Union level alone.

4.9 In Article 2(2), the EESC advocates replacing "at Union level" with "in Union affairs and questions", and amending the part of the sentence "developing citizens' understanding of the Union policy making-process" to "developing citizens' understanding of the policy making-process concerning Union questions and their ability to take part in this process".

4.10 The EESC recommends that Article 3(2) be expanded and amended as follows:

(3rd indent) Support for organisations whose activities serve the general European interest or entail an explicit European dimension

(4th indent) Community building and debates on citizenship issues bringing in targeted audiences through the use of internet and communication technologies or social media, and strengthening the European dimension through other channels and means of communication

(5th indent) Union level events, in specific and justified cases. Reason: events held at Union level do not always bring added value, as they very often only involve citizens who are already informed about and engaged in European issues, and the results do not justify the high level of expenditure they require.

⁽¹⁵⁾ See footnote 13.

(7th indent) Reflection/debates on common values, and on the future of Union citizenship and opportunities for participating in this sphere

(8th indent) Initiatives to raise awareness on the EU institutions and their functioning, citizens' rights, especially democratic rights, and the process of policy-making, particularly EU policy, at national level. These initiatives should seek to involve citizens in shaping policy and taking decisions at the various levels and stages

(11th indent) Support of programme information/advice and administrative structures in the Member States

(12th indent) new indent: grants in eligible Member States or regions where access to resources for activities relevant to the programme's objectives is limited or where the rate of civic participation is below average.

4.11 Regarding Article 4 of the proposal, the EESC underlines that the Commission should, as far as possible, avoid public procurement contracts, which most often lead to ambitious and costly public relations campaigns that are however remote from citizens. It should be ensured that all activities are as open as possible to all participants in the programme.

4.12 The EESC recommends expanding Article 6 in keeping with the present opinion, and with point 2.6 in particular.

4.13 In Article 8, consideration should be given to deleting the provision that new programme priorities are set each year, or to watering down the wording of the article.

4.14 The EESC advocates adding the following to Article 9: "3. It should be made possible for representatives of the Committee of the Regions, the European Economic and Social Committee and the partners in the structured dialogue to be actively involved in the programme's management committee, giving them expert, full member, observer or active observer or similar status, or setting up a formal or non-formal interinstitutional working group to draft the annual programme".

4.15 The EESC recommends adding the following to Article 10: "The parties listed in Article 9 above must be broadly involved at every stage of the programme's evaluation and further development".

4.16 The EESC suggests adding the following to Article 14(2): "shall report to the European Parliament, the European Economic and Social Committee and the Committee of the Regions on a regular basis". The EESC recommends adding the words "among others" in the first part of Article 14(3).

4.17 The EESC suggests adding an indication to chapter 2 of the annex (Programme management) that it is both conceivable and advisable to involve the European Commission's Representations in the Member States, or such other national level structures as it may judge capable of taking part, in the administration of the various strands of the programme.

4.18 With regard to the evaluation criteria mentioned in the annex, the EESC is particularly anxious to emphasise that a stronger financial commitment should be made in countries and regions where the resources intended to achieve the objectives of the programme are limited or not accessible, or where indicators reveal low participation.

4.19 In point 2.2.1 of the Legislative financial statement for proposals, the EESC categorically rejects the comment that the participation of medium and small-sized organisations presents a risk to programme management, and calls for it to be removed immediately. In line with the comments made earlier, the EESC points out that such groups are particularly well-suited to civic participation, and that they should be encouraged in every way possible to involve themselves in the programme, in particular by making it easier to submit and manage projects, by lowering the budget threshold they must reach, by permitting the absence of foreign partners where this is not objectively necessary, and by reducing the amount of co-financing required.

4.20 The EESC calls either for the number of projects laid down in the annex for the various activities to be reviewed, together with their rates of financing, so as to take account of the requests made earlier in the present opinion with a view to making them more accessible to medium or small-sized organisations, and/or for the creation of one or several categories specifically for small-scale projects, offering them better access to operating grants, longer deadlines, etc.

Brussels, 11 July 2012.

The President
of the European Economic and Social Committee
Staffan NILSSON