

23 February 2021

Věra Jourová
Vice-President for Values and
Transparency
European Commission

CC: Irena Moozova
Director Equality and Union Citizenship
Directorate General for Justice and Consumers

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 (CSOs) 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. Thus, 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. We encourage you to take them into consideration.

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 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. 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 (steps would have to be taken to avoid conflicts of interest).
 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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Balázs Dénes, Executive Director, Civil Liberties Union for Europe – EU Network

Karolina Dreszer-Smalec, President, National Federation of Polish NGOs – Poland

Ewa Kulik-Bielińska, Director, Stefan Batory Foundation – Poland

Veronika Móra, Director, Hungarian Environmental Partnership Foundation – Hungary

Šimon Pánek, CEO, People in Need – Czech Republic

Márta Pardavi, Co-Chair, Hungarian Helsinki Committee – Hungary

Ionuț Sibian, Managing Director, Civil Society Development (CSDF) – Romania

List of signatories:

National platforms of CSOs

Civic Alliance - Latvia
CNVOS - Slovenia
Croatian Platform for International Citizen Solidarity CROSOL - Croatia
Finnish Development NGOs Fingo – Finland
Hlas občianskych organizácií – Slovakia
IGO - Interessenvertretung Gemeinnütziger Organisationen – Austria
National Network for Civil Society (BBE) – Germany
National NGO network Citizen Participation Forum – Bulgaria

Organisations from EU Member States

A Buon Diritto Onlus – Italy
Academia Cidadã | Citizenship Academy – Portugal
ANAIIS Association – Romania
Antigone – Italy
APADOR-CH – Romania
Applied Research and Communications Fund – Bulgaria
ARCI – Italia
Are You Syrious – Croatia
Arena media – Bulgaria
Artemisszio Foundation – Hungary
Asociatia Nevo Parudimos – Romania
Associação à Praça – Portugal
Associação de Mulheres contra a Violência – Portugal
Association “Maria’s Family Center” Varna – Bulgaria
Association Delphi – Bulgaria
Association for International Affairs – Czechia
Association for LGBT TOLERADO – Poland
Association for support of people with mental disabilities – Bulgaria
Association of European Journalists Bulgaria – Bulgaria
ASTRA Network – Poland/CEE region
Autonomia – Poland
Autonomia Foundation – Hungary
Az Emberség Erejével Alapítvány – Hungary
BCause Foundation – Bulgaria
BlueLink Foundation – Bulgaria
Bulgarian Center for Not-for-Profit Law – Bulgaria
Bulgarian Donors' Forum – Bulgaria
Fondatsiya EkoObshtnost – Bulgaria
Bulgarian Fund for Women, Women's Funds Europe – Bulgaria
Bulgarian Institute for Legal Initiatives foundation (BILI) – Bulgaria
Campaign Against Homophobia – Poland
Capital foundation – Bulgaria
Center for cultural activities – Croatia
Center for Public Innovation – Romania
Center for Sustainable Communities Development – Bulgaria
Centre for Peace Studies – Croatia
Centre for Public Policy PROVIDUS – Latvia
Chitalishte "Lyuben Karavelov- 1897" -Kurtovo Konare – Bulgaria
Sieć Obywatelska Watchdog Polska – Poland

Civil College Foundation – Hungary
Clean Air Action Group – Hungary
Club NGO – Bulgaria
Community foundation Varna - Bulgaria
Croatian Volunteer Development Centre – Croatia
CSKR – Hungary
Democracy International – Germany
Dijaspora Afrikanaca u Hrvatskoj – Croatia
DKolektiv - organisation for social development – Croatia
Documenta - Center for Dealing with the Past – Croatia
DOTS Foundation for an Open Society – Latvia
Dziewuchy Berlin – Germany
Ecumenical Women's Initiative (Women's Funds Europe) – Croatia
Education for Democracy center – Bulgaria
Ekopolis Foundation – Slovakia
Estonian Human Rights Centre – Estonia
European Institute – Bulgaria
Movimento Europeo CIME – Italy
European Spaces 21 Association – Bulgaria
Board Co-Chairs, EU-Russia Civil Society Forum – EU Network
Federacja Znaki Równości – Poland
Federation for Women and Family Planning – Poland
Filia die Frauenstiftung – Germany
Forum Darczyńców w Polsce – Poland
Forum for Freedom in Education – Croatia
Foundation "Public Administration Competence Development" – Latvia
Fundacja Aktywności Lokalnej – Poland
Fundacja dla Wolności – Poland
Fundacja na rzecz Collegium Polonicum – Poland
Fundacja Partners Polska – Poland
Gender Alternatives Foundation – Bulgaria
Genderové informační centrum NORA, o.p.s. – Czech Republic
Háttér Society – Hungary
Helsinki Foundation for Human Rights – Poland
Human Platform Association – Hungary
Human right center „Vasil Levski“ – Karlovo – Bulgaria
Human Rights House Zagreb – Croatia
Hungarian Civil Liberties Union (HCLU) – Hungary
Hungarian Europe Society – Hungary
Iniciatíva Inakost' – Slovakia
Innovative Community Centres Association – Bulgaria
Institute of Health Psychology Polish Psychological Association – Poland
Institute of Public Affairs (IPA) – Poland
Jewish Association Czulent – Poland
Kárpátok Alapítvány-Magyarország – Hungary
Karpatská nadácia / Carpathian Foundation - Slovakia
Knowledge Association – Bulgaria
Komitet Obrony Demokracji – Poland
Latvijas Māsu asociācija – Latvia
Legal-Informational Centre for NGOs Slovenia (PIC) – Slovenia
Liga za ľudské práva /Human Rights League – Slovakia
Ligue des droits de l'Homme – France
Mediterranean Institute of Gender Studies – Cyprus
Mediterranean Women's Fund – France

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Migrant Women Association – Malta
Nadace Partnerstvi – Czech Republic
Nadacia otvorenej spolocnosti Bratislava / Open Society Foundation / NOS-OSf – Slovakia
National Network for Children – Bulgaria
Netherlands Helsinki Committee – Netherlands
New Europeans AISBL - Belgium
NGO RomanoNet – Czech Republic
Nyt Europa – Denmark
Open Estonia Foundation – Estonia
Open Lithuania foundation – Lithuania
Open media group – Croatia
Open Republic – Association against Anti-Semitism and Xenophobia – Poland
Open Society Institute – Sofia – Bulgaria
OSF Prague – Czech Republic
Peace Institute – Slovenia
Polgar Foundation for Equal Chances – Hungary
President, Expert Forum (EFOR) – Romania
Public Institution Roma Community Centre – Lithuania
Riga German Culture Society- RVKB – Latvia
Sdružení pro integraci a migraci – Czech Republic
SOLIDARNA - Foundation for Human Rights and Solidarity – Croatia
Stowarzyszenie im. Stanisława Brzozowskiego (Krytyka Polityczna) – Poland
Terra Hub – Croatia
The Good Lobby – EU
Towarzystwo Dziennikarskie – Poland
UNION OF WOMEN ASSOCIATIONS OF HERAKLION – Greece
Vidusdaugava NGO Center – Latvia
Vilnius Institute for Policy Analysis – Lithuania
Vilnius Women's House – Lithuania
WAVE Network – Austria
Women's Support and Information Centre NPO – Estonia
Workshop for Civic Initiatives Foundation – Bulgaria
Youth Initiative for Human Rights – Croatia
Zagreb Pride – Croatia

Non-EU Organisations

CDI Macedonia – North Macedonia (FYROM)
Center Women and Modern World – Azerbaijan
Gender Alliance for Development Centre – Albania
New Europeans UK – United Kingdom
Reconstruction Women's Fund – Serbia
Scottish Women's Aid – Scotland
Terra-1530 – Moldova
Women Center "Light Steps" – Albania
Women's resource center NGO – Armenia
Women's Fund – Armenia
Women's Fund – Georgia
Women's Support Center NGO – Armenia