

Warsaw, 14th March 2002

Ms Ursula von der Leyen President of the European Commission

Ms Elisa Ferreira Commissioner for Cohesion and Reforms

Ms Ylva Johansson Commissioner for Home Affairs

Mr Nicolas Schmit Commissioner for Jobs, Social Rights

Mr Janez Lenarčič Commissioner for Crisis Management

Subject: Acknowledging the role of Polish NGOs in the Ukrainian refugees crisis by including NGOs as beneficiaries of the direct or shared management crisis management tools of the European Union

Honorable Commissioners,

the war in Ukraine has triggered an unprecedented humanitarian emergency. Two million Ukrainian refugees have already arrived in the EU since the Russian invasion started. Poland is at the forefront of addressing this humanitarian crisis and offering shelter and basic assistance to the displaced people. In order to avoid a humanitarian disaster, Polish NGOs mobilized all their resources to provide direct humanitarian aid at the border, but also in the war zone, and in all Polish cities and regions. Since the beginning of the crisis, Polish civil society organizations have provided medical care, psychological support, legal assistance, interpretation services, shelter, childcare services, and have organized logistics to bring aid to Ukrainian cities under siege. Finally, they coordinate transport and accommodation for refugees arriving at the eastern UE border. Even before any help was institutionalized, Polish NGOs created first response reception and information points.

Therefore, it is with great appreciation and hope, that we have been looking towards the European Commission who has acted swiftly and has introduced a robust package of legislative and operational changes to mitigate the humanitarian emergency impacts of the Ukrainian crisis in the EU countries receiving the refugees. Such measures include, the introduction of numerous flexibility mechanisms for the European Structural and Investment Funds under the legislative proposal of the "Cohesion's Action for Refugees in Europe" (CARE), via changing priorities in the Cross Border Cooperation programmes: Poland – Russia and Poland-Ukraine-Belarus,



finally mobilizing emergency crisis instruments such as the Fund for European Aid to the Most Deprived, Emergency Support Instrument and the emergency mechanism under the Asylum, Migration and Integration Fund.

The above mentioned mechanisms fall mostly under the shared management. We observe that, similarly to the 2020 COVID-19 state of emergency mechanisms, the Polish Managing Authorities (regional and national public authorities) aim now at constructing programmes and instruments or projects (national or regional crisis 'shields'), wherein solely the public authorities would become beneficiaries. The enormous needs of NGOs, resulting from the lingering effects of the pandemic efforts, as well as from the current humanitarian crisis, would be left unaddressed.

During a series of public hearings related to the adoption of The National Recovery and Resilience Plan in 2021 [1], civil society representatives demanded permanent inclusion of non-governmental organizations in the crisis management system of public administration at every level. As representatives of Polish NGOs, we have also prepared the so-called Social component to the National Recovery and Resilience Plan. Unfortunately, this proposal was not included in the Plan adopted by the Government of the Republic of Poland and sent to the European Commission, and as the current situation demonstrates, applying the solutions proposed would strengthen NGOs in their efforts to contain the humanitarian crisis.

The challenges posed by the current situation differ from the COVID-19 pandemic crisis, when the public national authorities were at the forefront of the health crisis management. This time the crisis will very much affect the integration of refugees at the local level, but a significant number of NGOs have yet to recover from the effects of the pandemic (in particular those that operate centers supporting children and youth. Many of them did not survive the pandemic, others currently lack funding to cover the costs of maintaining their premises and employing specialists).

This is why we urge the European Commission to pay due diligence in any direct or shared management programmes or instruments to open the EU support to all, especially to grass-roots NGOs that are supporting the Ukrainian refugees now and will support their integration into European society soon. This should be explicitly underlined in any discussions and agreements between the European Commission and the Polish authorities.

Non-governmental organizations are an essential element of the Polish civil society. The necessity to strengthen civil society was explicitly mentioned in the Council 2020 Country Specific Recommendations for Poland [2]. During the first days of the crisis, the interventions of the representatives of Polish civil society organizations have demonstrated their invaluable knowledge and expertise. The NGOs at the frontline deployed all existing resources at their disposal, swiftly identified needs and challenges; and implemented corresponding actions to help people fleeing the war in Ukraine.

We are willing to work hand in hand with Polish regional authorities in order to flexibly respond to the rapidly emerging needs during this crisis and thereby to help the most affected. For this to happen, NGOs need to be included as beneficiaries or get integrated into umbrella projects. It is of particular importance to confirm that the 100% co-financing rule for the CARE package, could also be applied to NGOs, finally that projects' costs incurred so far by the NGOs could be retroactively reimbursed, as indicated in the Commission communication of 8 March 2022 [3] regarding the CARE package. This would be a very much needed assistance to all NGOs operating with limited



budgets, in need for a fast, easy, and straightforward procedure to obtain access to financing. NGOs develop tailor-made solutions for the short and long-term integration of refugees as well as projects dealing with the challenges related to violence, hate crime, or addictions. In short, civil society actors are assisting public administration in areas such as education & training, employment, social inclusion, childcare, elderly care, and support for people with disabilities. NGOs operate child and youth support centers, and train intercultural assistants. This is why civil society organizations need opportunities to finance specialist training and capacity building. Last but not least, it is of key importance to strengthen the ability of Ukrainian civil society to self-organize as a community in our country. We need to act now in order to prevent xenophobic attitudes. Despite the warm welcome that Ukrainian refugees received in Poland, we are deeply concerned that the lack of relevant integration mechanisms, especially on a local level, may transform opennesses into a conflict.

Additionally, it is of vital importance to properly define and safeguard the role of the Polish NGOs in the emergency crisis instruments such as the Fund for European Aid to the Most Deprived, the Emergency Support Instrument, and the emergency mechanism under the Asylum, Migration and Integration Fund. Finally, we have not found any adequate call for proposals for direct grants [3]. Please advise whether we can expect any call for proposals dedicated to NGOs in relation to refugees' integration in the near future.

We hope to work in partnership with the European Commission and the regional actors to build constructive cooperation in the months to come and to ensure immediate support to those fleeing Ukraine by assisting them in language training, finding jobs, starting or continuing education, accessing childcare, counseling, and providing psychological assistance [4]. As a National Federation of Polish NGOs, we addressed the Prime Minister of the Republic of Poland, the Minister of Funds and Regional Policy, as well as the Marshals of Polish regions, with a corresponding statement.

Looking forward to your assistance and quick reply.

Yours sincerely,

Karoling Ineszer - Smalec

President of the board of the National Federation of Polish NGOs

* National Federation of Polish NGOs is an independent and the largest supra-thematic federation of non-governmental organizations in Poland (established in 2003). The federation consists of both regional and thematic unions, large nationwide organizations, as well as numerous small, locally operating associations and foundations. In total, we associate over 1,100 organizations in Poland and an additional 16,000. units of the volunteer fire brigades. The Federation is represented in various councils, expert and consultative teams and dialogue bodies, as well as monitoring committees of European funds. The Federation is actively involved in capacity building of the civil society and influencing the shape of public policies, it also conducts activities at the international level within the European networks of organizations such as European Civic Forum. We are the organizer of the Polish Forum of Non-Governmental Initiatives, held every three years since 1996, the largest and oldest celebration of socially engaged people and organizations.



CC.

Ms Manuela Geleng, Director, Directorate for Employment, Social Affairs and Inclusion

Ms Emma Toledano Laredo, Director, Directorate for Regional and Urban Policy

Ms Chiara Gariazzo, Director Migration and Home Affairs

Mr Hans Das, Director, European Civil Protection and Humanitarian Aid Operations

[1] Public hearings in Poland concerning The National Recovery and Resilience Plan of Poland were organized by The National Federation of Polish NGOs and The Shipyard Foundation with financial support from NGOs. The hearings were conducted in cooperation with the Polish Ministry of Funds and Regional Policy and under the patronage of the Partnership Agreement Committee of the Partnership Development Subcommittee -

https://www.wysluchanieplanodbudowy.pl/

[2] EUR-Lex - 52020DC0521 - EN - EUR-Lex (europa.eu)

[3] Ukraine: EU steps up solidarity with those fleeing war (europa.eu)

[4] Search Funding & Tenders (europa.eu)