

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,

Raffaella Bolini & Jean Marc Roirant, Co-Presidents, European Civic Forum – EU Network

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

**Contact:** Alexandrina Najmowicz – European Civic Forum  
anajmowicz@civic-forum.eu / +33 6 29 87 00 98

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