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<p style="text-align: center;">Contribution to the Public Consultation on EU funds in the area of migration</p>
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Our organisations represent Anglican, Orthodox, Protestant and Catholic Churches throughout Europe, as well as Christian agencies particularly concerned with migrants, refugees, asylum seekers and victims of trafficking. As Christian organisations we are deeply committed to the inviolable dignity of the human person created in the image of God, as well as to the common good, the principles of subsidiarity and solidarity, and the creation of welcoming societies that promote the integration of the newcomers. We also share the conviction that ethical principles must be reflected in daily EU politics, including its policies in the area of freedom, security and justice. It is against this background that we submit this contribution to the *Public Consultation on EU funds in the area of migration* launched by the European Commission (deadline: 8 March 2018).

1.- Particular policy challenges

The EU has not yet fully recovered from the financial and economic crisis. The high numbers of migrant arrivals in 2015 have created a feeling of insecurity and fuelled a sense of competition over social assistance between vulnerable groups. Rising populism and xenophobia are worrying consequences of these accumulated crises and generate additional barriers to an already challenging integration. **Decisive action at political and societal level is urgently needed** to foster social cohesion and to reduce the increased risk of poverty and social exclusion, which also many migrants continue to face. A play-off of marginalized and vulnerable European citizens against socially excluded migrants must not be permitted. The EU should provide sufficient financial resources in order to address social exclusion and risk of poverty of EU citizens and migrants in Europe. Moreover, there is a need to respond to the negative mass and social media's image given to the "migration challenge" by **promoting an alternative narrative to migration**. In addition, migrants should be at the centre of the policies,

and they should be considered not as passive recipients or beneficiaries, but an active part of the EU funded projects for their integration.

2.- Alternative financial models for community-based projects

Micro financing schemes or other creative ways to support directly small-scale citizens' initiatives which are, otherwise, not in the position to apply directly for EU funding (as they aren't eligible or lack capabilities to do so), should be explored. We must also remind that part of the work for the well-being of migrants carried out through Churches and religious communities and associations, as well as CSOs, is a volunteering expression of solidarity, and the resources dedicated to administrative procedures in their respective organisations are very limited. **Co-funding requirements represent an obstacle** for carrying out community-based projects, in particular those with a strong volunteering component, due to their limited financial margin of manoeuvre. In this regard, it would be important to **reduce the co-financing rates**, but also to offer smaller financial project support (less than EUR 100,000) and to allow the calculation of contributions in kind (especially volunteering and the free provision of land and venues) as an eligible part of the partner budget. In case of larger support, the long-term perspective must not be forgotten, as EU-funding for social actions needs to be **resilient and sustainable from a long-term perspective**. As a positive consideration, EU funds ought to include a sufficient amount of indirect costs for the management by the applicant/executing partner, as is the case in other EU funding programmes, e.g. research.

An alternative channel to meet the needs and administrative capacities of Churches and CSOs could be the **use of direct agreements instead of call for proposals** by consortia of established organisations linked to grassroots partnerships, with full transparency. On the other hand, we also find that **transnational partnerships are missed** as EU funding in the area of migration has largely been allocated for national-based projects. We consider that this transnational dimension is an EU added value that should be reinvigorated, as migration management is a common and shared concern for EU member states and for European citizens.

3.- Simplifying EU funding procedures

There is an **increasing bureaucratisation** in the process of EU funding, in particular in relation to the economic justification of projects, and, in some cases, even uneasy compliance regimes. Some examples of these administrative obstacles and difficulties are: the requirement to submit original documentation from the very beginning (salaries, bills...), little flexibility to replace employees in case of leaves (sick, maternity...) and to give complements to the salaries which are linked to certain unforeseen circumstances, and little time period to prepare the reports (intermediate and final) after each resolution of the grant. **“Gold-plating” is an additional burden** that makes difficult for community-based projects for migrants to be launched and maintained. In order to better allocate EU funding in the area of migration and not provoking an “administrative exclusion” of Churches and religious communities and associations, as well as CSOs, due to their small size or lack of capacity and human/technical resources, we **encourage the EU to simplify as much as possible the existing EU funding procedures (e.g. continuity regarding funding conditions, simplification, standardisation and rationalisation of the application documents)**, creating new

funding channels to make possible for small-scale initiatives by Churches, religious communities and associations, and CSOs to access EU funding. In particular, we refer to the **application procedures and the lack of flexibility and burdening reporting obligations that represent a major obstacle** for small initiatives, as they simply do not have the capacity to dedicate to such lengthy, technical and time-consuming processes.

4.- Community building & small-scale initiatives

While recognising that through large-scale projects the EU is able to manage its funding more easily, we strongly recommend investing **not only in large projects, but also in a larger number of local, small scale, community building initiatives**, by giving priority to the financing of such projects within the relevant European funds. As it is widely recognised, integration takes place at the lowest local level, many times through small and medium size projects that are frequently the most successful stories of real and genuine integration in a “peer-to-peer” and “daily life experience” approach. In this regard, national governments might invest not only in inclusion and integration projects in capitals, big cities or metropolitan areas, but also in **smaller towns and rural areas**. This is particularly necessary when forced migrants are distributed and sent to these rural or less populated areas.

5.- Mainstreaming integration of migrants along with other vulnerable people

In our view, integration of migrants should be mainstreamed within **broader policies on social inclusion**, by prioritising the funding of projects with **mixed target groups, both migrants and other local vulnerable groups**. The *“I Get You”* report published by JRS Europe, that maps key data analysis of 315 community building initiatives, shows that these initiatives have higher chances to be successful in combating racism and xenophobia. A positive example can be found in Plauen (Eastern Germany), where a grassroots organisation composed mainly of volunteers adopted an inclusive approach, organising activities both for forced migrants and different groups of marginalized and vulnerable locals, such as young people with disabilities and unemployed people. This approach proved to be successful in promoting an inclusive community for all rather than competition among locals and refugees in a town with strong and widespread racist attitudes. An additional difficulty is the work with migrants that are in the process of regularization, but have not yet received their documents: in this case, they cannot be considered as beneficiaries in EU funded projects. In Spain, for example, the Identification Number for Foreigner (“Número de Identificación de Extranjero”, NIE, in Spanish) is required for being beneficiary of these projects. The same applies to persons with double citizenship, one of which is a EU nationality: certain organisations don’t make distinctions in their work on the basis of the administrative status of the migrant, and these situations make their work more complex. As an indirect unhealthy effect, it also provokes a certain competition among CSOs looking for migrants with “easier” administrative status, harming potential synergies and common projects. We believe that a proper allocation of EU funds in the field of migration should be **focused on the wellbeing of migrants and people of the hosting societies** (including their security dimension).

Concerning the distribution of funding, we would recommend that not less than 30% of the EU migration funds are allocated for integration purposes, and 30% for enhancing asylum protection.

6.- Synergies

At member states' level, we consider that a **better coordination between Managing Authorities (MAs)** would be important in order to increase the impact of synergies, e.g. through coordinated calls for proposals between ESF and FEAD, or ESF and AMIF. For example, AMIF programmes cannot finance employment actions that could be funded via ESF: this makes it more difficult to achieve an integral approach to integration of migrants, as employment is a key to social integration. Moreover, **stakeholders and potential beneficiaries should be involved** in the set-up of calls for proposals from day one as it was in principle foreseen with the partnership principle. Both at European and national level, this still requires further practice. We consider that the funding system would be improved if comprehensive capacity-building was offered by the European Commission to MAs, but also by MAs to Churches, religious communities, associations and actors, and CSOs, in order to be not only successful in their applications for funding but also in the implementation of the projects. The EU could also **promote an appropriate context and provide resources to enhance networking** among Churches' actors and CSOs benefiting from AMIF, in order to promote a more holistic attention to migrants.

Brussels, 7 March 2018