Public consultation on EU funds in the area of values and mobility

> Fields marked with * are mandatory.

Public consultation on EU funds in the area of of values and mobility

Introduction

 'A stronger Union needs to be equipped with appropriate financial means to continue to deliver its policies. The Union has changed fundamentally in recent years, as have the challenges it faces. Our Union needs a budget that can help us achieve our ambitions. The Multiannual Financial Framework for the period after 2020 must reflect this.' (Commission Work Programme 2018)

The EU budget currently amounts to less than 1 euro per citizen per day. Although a modest budget, at around 1 % of the EU's gross national income or 2 % of all EU public spending, it supports the EU's shared goals by delivering essential public goods and tangible results for EU citizens. These include: investing in skills, innovation and infrastructure; ensuring sustainable food supply and developing rural areas; promoting joint research and industrial projects; funding shared activities in the field of migration and security; and supporting development and humanitarian aid.

The current Multiannual Financial Framework — the EU's long-term budget — runs until the end of 2020. In 2018, the Commission will put forth comprehensive proposals for the post-2020 Multiannual Financial Framework and for the next generation of financial programmes that will receive funding. These programmes/funds provide financial support to hundreds of thousands of beneficiaries such as regions, towns, NGOs, businesses, farmers, students, scientists, and many others.

The Commission's proposals will be designed to make it possible for the EU to deliver on the things that matter most, in areas where it can achieve more than Member States acting alone. This requires a careful assessment both of what has worked well in the past and what could be improved in the future. What should the priorities be for future policies and programmes/funds? And how can they be designed to best deliver results on the ground?

As an integral part of this process and following on from the Reflection Paper on the Future of EU Finances, the Commission is launching a series of public consultations covering all the major spending areas to gather views from all interested parties on how to make the very most of every euro of the EU budget.

The scope of this public consultation covers programmes and actions aiming at protecting and promoting European values as well as supporting mobility, education and training, cultural diversity, fundamental rights, an EU area of justice, digital competence, creativity and European historical memory and remembrance. Such programmes and actions empower citizens, develop their skills and competences and contribute to open, democratic, more equal, inclusive and creative societies. This public consultation seeks to identify strengths and weaknesses of existing programmes and actions, as well as possible ways forward and highlight any possible synergies among them.

Recent consultations already covered several policy areas, including on current performance and future challenges. The views already expressed by stakeholders in these consultations will be taken into account as part of the preparatory process for the future of the multiannual financial framework.

Link to portal for recent consultations:
https://ec.europa.eu/info/consultations_en
Consultations in the policy area education and training:
https://ec.europa.eu/info/consultations_en?
field_consultation_status_value=All&field_core_policy_areas_target_id_selective=1203
Consultations in the policy field culture and media:
https://ec.europa.eu/info/consultations_en?
field_consultation_status_value=All&field_core_policy_areas_target_id_selective=1184
Consultations related to values:
https://ec.europa.eu/info/consultations_en?
combine=values&field_consultation_status_value=All&field_core_policy_areas_target_id_selective=All

About you

*1 You are replying

   ◯ as an individual in your personal capacity

   🔘 in your professional capacity or on behalf of an organisation

*8 Respondent's first name

> Marek

*9 Respondent's last name

> Misak

*10 Respondent's professional email address

> marek.misak@comece.eu

*11 Name of the organisation

> Secretariat of COMECE (Commission of the Episcopates of the European Union)

*12 Postal address of the organisation

> 19, Square de Meeus
> 1050 Bruxelles
> Belgium

*13 Type of organisation

Please select the answer option that fits best.

- ◯ Private enterprise
- ◯ Professional consultancy, law firm, self-employed consultant
- ◯ Trade, business or professional association
- ◯ Non-governmental organisation, platform or network
- ◯ Research and academia
- ⦿ Churches and religious communities
- ◯ Regional or local authority (public or mixed)
- ◯ International or national public authority
- ◯ Other

*22 Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register here, although it is not compulsory to be registered to reply to this consultation. Why a transparency register?

- ⦿ Yes
- ◯ No
- ◯ Not applicable

*23 If so, please indicate your Register ID number.

> 47350036909-69

Text

*24 Country of organisation's headquarters

- ◯ Austria
- ⦿ Belgium
- ◯ Bulgaria
- ◯ Croatia
- ◯ Cyprus
- ◯ Czech Republic
- ◯ Denmark
- ◯ Estonia
- ◯ Finland
- ◯ France
- ◯ Germany
- ◯ Greece
- ◯ Hungary

○ Ireland

○ Italy

○ Latvia

○ Lithuania

○ Luxembourg

○ Malta

○ Netherlands

○ Poland

○ Portugal

○ Romania

○ Slovak Republic

○ Slovenia

○ Spain

○ Sweden

○ United Kingdom

○ Other

* 26 Your contribution,

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N°1049/2001

⦿ **can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)

○ **can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

* 27 Please let us know whether you have experience with one or more of the following funds and programmes.

at least 1 choice(s)

☑ Erasmus+ programme

☑ European Solidarity Corps

☑ Creative Europe programme

☑ Rights, Equality and Citizenship Programme

☑ Europe for Citizens Programme

☑ EU programme for employment and social innovation

☑ EURES – the European job search network

☑ European Social Fund

☑ Justice Programme

☑ Consumer Programme

☑ EU aid volunteers

☐ None of the above

* 29 Please let us know to which of the following topics your replies to this questionnaire will refer.

☑ Learning mobility

☑ Education and training apart from mobility

- ☑ Volunteering, humanitarian aid, solidarity
- ☑ Youth work
- ☑ Labour mobility
- ☑ Culture, media and arts
- ☑ Citizenship and values
- ☑ Justice area, judicial cooperation, rights
- ☑ Consumer Protection
- ☐ None of the above

EU funds in the area of mobility and values

31 The Commission has preliminarily identified a number of policy challenges which programmes/funds in this area – mobility and values - could address. How important are these policy challenges in your view?

	Very important	Rather important	Neither important nor unimportant	Rather not important	Not important at all	No opinion
Support lifelong skills development through learning mobility	◉	○	○	○	○	○
Support employability through lifelong learning mobility	◉	○	○	○	○	○
Support digitalisation and digital transformation	◉	○	○	○	○	○
Promote modernisation of education and training	◉	○	○	○	○	○
Promote cooperation between education and training and labour market actors	◉	○	○	○	○	○
Support innovation	○	◉	○	○	○	○
Promote solidarity	◉	○	○	○	○	○
Promote social inclusion and fairness	◉	○	○	○	○	○
Support active citizenship, democratic						

	1	2	3	4	5	6
participation in society, and the rule of law	●	○	○	○	○	○
Promote European identity and common values	○	●	○	○	○	○
Promote rights and equality	●	○	○	○	○	○
Foster European cultural diversity and cultural heritage	●	○	○	○	○	○
Support competitiveness of European cultural and creative sectors	○	○	●	○	○	○
Reinforce the EU area of justice strengthening judicial cooperation	○	●	○	○	○	○
Promote consumers' interests and ensure high level of consumer protection	●	○	○	○	○	○
Other (Please specify below)	●	○	○	○	○	○

*32 If you identified another policy challenge, please specify it here:

200 character(s) maximum

> Demographic trends;brain drain;ecological transition;integration of migrants&refugees through education; transformative change in economy&labor world;people-,family-, community-centred approach

33 To what extent do the current policies successfully address these challenges?

	Fully addressed	Fairly well addressed	Addressed to some extent only	Not addressed at all	No opinion
Support lifelong skills development through learning mobility	○	●	○	○	○
Support employability through lifelong learning mobility	○	●	○	○	○
Support digitalisation and digital transformation	○	○	●	○	○
Promote modernisation of education and training	○	●	○	○	○
Promote cooperation between education and training and labour market actors	○	●	○	○	○
Support innovation	●	○	○	○	○
Promote solidarity	○	○	●	○	○
Promote social inclusion and fairness	○	○	●	○	○
Support active citizenship, democratic participation in society, and the rule of law	○	○	●	○	○
Promote European identity and common values	○	●	○	○	○
Promote rights and equality	○	○	●	○	○
Foster European cultural diversity and cultural heritage	○	●	○	○	○
Support competitiveness of European cultural and creative sectors	○	○	●	○	○

Reinforce the EU area of justice strengthening judicial cooperation	○	○	◉	○	○
Promote consumers' interests and ensure high level of consumer protection	○	○	◉	○	○
Other (as specified in Question 1)	○	○	◉	○	○

* 34 To what extent do the current programmes/funds add value, compared to what Member States could achieve at national, regional and/or local levels?

- ○ To a large extent
- ◉ To a fairly good extent
- ○ To some extent only
- ○ Not at all
- ○ Don't know

35 Please specify <u>how</u> the current programmes/funds add value compared to what Member States could achieve at national, regional and/or local levels.

1500 character(s) maximum
Please clearly indicate to which policies, programmes and funds your answer refers.

> Programmes and funds that promote and facilitate the exchange between EU citizens, such as Erasmus+ or Europe for Citizens, are key drivers for European cohesion and hence strengthen the legitimacy of the European Union. Direct encounters and shared experiences help to overcome prejudices and make a Europe based on the principles of solidarity, freedom and cultural diversity come alive for EU citizens of all ages. The current programmes and funds add value as they enable mutual learning and sharing of good practices across the EU and thus improve educational and youth work. In addition, European programmes and funds often initiate or support activities that are (not yet) covered by local or national programmes. Moreover, EU programmes like the EU Consumer Programme help to develop a more long-term-oriented vision of changes in the society.

36 Is there a need to modify or add to the objectives of the programmes/funds in this policy area? If yes, which changes would be necessary or desirable?

1500 character(s) maximum
Please clearly indicate to which policies, programmes and funds your answer refers.

> The respective funds should better reflect the needs of people with fewer opportunities. They should support not only projects addressing the needs of the labour market, but also initiatives focusing on integral human development and community-building,incl. non-formal & informal education. The budget for Erasmus+ should be adapted to avoid current high rejection rates. Regarding cultural heritage, the EU should explicitly recognise and support the material and immaterial value of religious heritage. In the Fundamental Rights area, the EU should support initiatives highlighting their universality, indivisibility, interdependence and interrelatedness. Activities of Churches and religious communities should be equally eligible for relevant funds concerning 'human rights defenders'. More attention should be given to protection of persons from discrimination on religious grounds. EU funds should highlight both aspects of the principle of non-discrimination and equally cover persons belonging to majority or minority denominations. EU funds should promote religious, cultural and fundamental rights literacy at national and EU level. References to funding for intercultural dialogue projects under the 'Europe for citizens programme' should explicitly include its

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interreligious element. The human person, family and community should be at the centre of economic policies, and especially regarding product safety. For further elements, see the attached document.

37 The Commission has preliminarily identified a number of possible obstacles which could prevent the current programmes/funds from achieving their objectives. To what extent do they apply in your view?

	To a large extent	To a fairly large extent	To some extent only	Not at all	Don't know
Lack of dedicated instruments to address new or specific needs	○	●	○	○	○
Insufficient outreach towards potential partners	●	○	○	○	○
Too narrow geographical scope of the programmes	○	●	○	○	○
Target groups too restricted	●	○	○	○	○
Lack of support to first-time applicants	○	●	○	○	○
Language obstacles	○	●	○	○	○
Obstacles to mutual recognition of study or training periods abroad and qualifications	○	●	○	○	○
Lack of budget of the programmes to satisfy demand	○	○	●	○	○
Low value of individual grants	○	○	●	○	○
Insufficient information and guidance	●	○	○	○	○
Lack of coordination with other funds and sectoral policies	●	○	○	○	○
Insufficient support provided to small-scale stakeholders	●	○	○	○	○
Insufficient use of results of individual projects	○	○	●	○	○
Limited possibilities for funding actions across the sectors of education, training and youth	●	○	○	○	○
Other (Please specify below)	●	○	○	○	○

*38 If you have identified another obstacle, please specify it here:

1000 character(s) maximum

- application procedures are too complex
- geographical scope could be extended
- ethical scope should be better taken into account

39 The Commission has preliminarily identified a number of steps that could help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds. To what extent would these steps be helpful in your view?

	To a large extent	To a fairly large extent	To some extent only	Not at all	Don't know
Clearer focus/priorities	○	○	●	○	○
Higher involvement of stakeholders in programme implementation	●	○	○	○	○
Use of more simplified application forms, reports and grant selection process	●	○	○	○	○
Increased dissemination and better exploitation of results	○	○	●	○	○
Simpler access for "new-comer" applicants and smaller/grass-root organisations	●	○	○	○	○
Incentives for people with fewer opportunities	●	○	○	○	○
Facilitating structured networks and partnerships	○	●	○	○	○
Facilitating funding for actions cutting across the sectors of action	○	●	○	○	○
Better coordination between different programmes/funds	○	●	○	○	○
Other (Please specify below)	●	○	○	○	○

*40 If you have identified another way to simplify and reduce burdens, please specify it here:
1000 character(s) maximum

- shorter application procedures
- tailored requirements according to the size of the applicant (parishes, schools vs. larger organisations)
- Erasmus+ should allow also for the funding of preparatory visits
- the geographical scope of programmes, such as Erasmus+ or Creative Europe, could be further extended to countries in broader EU neighbourhood in order to support personal encounters at and across different levels as well as foster mutual understanding between cultures and religions

41 How could synergies among programmes/funds in this area be further strengthened to avoid possible overlaps/duplication? For example, would you consider grouping/merging some programmes?
1500 character(s) maximum
Please clearly indicate to which policies, programmes and funds your answer refers.

The EU has already merged youth, education and sport sector in one single programme Erasmus+. While the experiences among Church-based actors are overall positive (better use of synergies from the different sectors), there are also drawbacks: the individual sectors in Erasmus+ lack visibility and the programme as a whole is still known in the wider public as an exchange programme for students. For the future, it is necessary to give the individual parts of the programme more autonomy, but to keep the current programme's structure with the key actions. While the European Solidarity Corps should be provided with "fresh money" in the current MFF period, a possible integration into the Erasmus+ successor programme should not come at the expense of current funds and programmes in this area. Considering the rapid decline in the approval rate for many quality Erasmus+ projects, there is a strong need for a budget extension, which will increase the funding of programme, but also individual part. In order to enhance information and access to EU funds, the unification of entry points for applicants may be considered. The entry point should then lead the applicant to relevant interlocutors for the respective EU programme. It should be ensured that attention for the specific needs related to different areas, such as justice, digitalisation, fundamental rights, youth, education etc. is not lost in big "merger programmes" and that EU funding for such crucial areas is not decreased.

Document upload and final comments

42 Please feel free to upload a concise document, such as a position paper. The maximum file size is 1MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.

2b0d5575-dad0-4b47-bb89-24a01fb714e6/Complementary_elements_Values_and_Mobility_.pdf

43 If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.

1500 character(s) maximum

Concerning the reference to "values" in this consultation, this concept implies changing relevance in time, incl. depending on the context and circumstances. Therefore, COMECE advocates for a Union of "principles" and of "rights". As a public authority, the EU shall ground its policies in a rights-based approach. The rule of law and democratic principles derive from those fundamental rights. The EU funds should fully respect the principle of subsidiarity and the division of competences between the EU and Member States. EU funding should avoid interference with questions falling under the exclusive competence of Member States. Political conditionality should not be an obstacle to the enjoyment of access to EU funds by the citizens. Churches and religious associations or communities have to be recognised in their specificity as potential partners for funding opportunities in the EU. They are key actors in areas, such as education, social cohesion, charity, humanitarian action, healthcare and development. EU procedures should ensure fair and equal access for these actors to the respective programmes. Applications for EU funding by these actors should therefore be processed without further requirements that may give rise to discrimination against such entities. For complementary elements, please see the attached document.

Contact

SG-OPC-VALUES-MOBILITY@ec.europa.eu

Complementary elements concerning the public consultation on

"EU funds in the area of values and mobility"

Additionally to the elements provided in the relevant questionnaire, the Secretariat of COMECE wishes to highlight the following considerations:

General remarks

Concerning the reference to the term "*values*" in this public consultation, the concept implies changes (even radical ones) and increasing/decreasing relevance in time, including depending on the context and circumstances. Therefore, COMECE would rather advocate for **a Union of "principles" and of "rights"**. The EU institutions, as all public authorities, should primarily ground their policies on a **rights-based approach**. The rule of law and democratic principles are deriving from those fundamental rights.

Being a key aspect of implementation of public policies, the EU funding should fully respect the **principle of subsidiarity** and the **division of competences** between the EU and Member States. It would therefore be important to **avoid funding** interfering with **questions falling under the exclusive competence of the Member States**.

Further **simplification of EU funding instruments** - already one of the focuses of the previous funding period - is still a challenge to be tackled, also for the areas covered by this consultation. This is crucial to facilitate access to EU funds for all stakeholders (cfr. also the remarks concerning Questions 36 and 38). As with EU transparency policies, the risk of exclusion or obstacles for actors that enjoy no "formal status" (e.g. migrants, the elderly, the poor, Roma people, informal youth groups, social movements) should be addressed.

Political conditionality should **not** be an **obstacle** to the enjoyment of access to EU funds by the **citizens**. The implementation of the **rule of law** is a **challenge** and a **commitment** for all the **Member States**, but also for the **EU institutions**. In this context, preventing or limiting access to EU funds for the citizens may be contrary to the principle of **equality before the law**, and even feed Eurosceptic public opinions. Instrumentalising the concept of the rule of law to address short-term crisis is not suitable. We do not consider the Multiannual Financial Framework or any budgetary reflection as being appropriate for a definition of the principle of the rule of law. Full respect for the separation of powers shall be ensured also in this regard.

Concerning the level of EU funding to applicants, we refer to our contribution to the public consultation on a proposal for a mandatory Transparency Register (2016): *"...the **level of EU funding to cover operative costs of organisations** active at the Union's level should be contained within **reasonable and sustainable limits,** so as to ensure that principles like independence, impartiality and equal treatment are protected".*

The **specificity of nature** of **Churches and religious associations or communities** has to be recognised by the respective EU funding instruments in order to ensure compliance with Articles 10 and 21 of the Charter of Fundamental Rights of the EU, as well as of Article 17 TFEU. Churches, their institutions as well as other religious associations or communities are

important societal actors. They play a crucial role in areas, such as education, social cohesion, charity, humanitarian action, healthcare and development. They shall therefore enjoy **fair and equal access** to respective EU funds and programmes. **Applications for EU funding** by religious or faith-based entities should thus be processed **without** further requirements that may give rise to **discrimination** against such actors and the final beneficiaries.

Ad Question 36)

"Is there a need to modify or add to the objectives of the programmes/funds in this policy area? If yes, which changes would be necessary or desirable"?:

From the perspective of Catholic Social Teaching, every human being has the right to **education** that corresponds with his or her capabilities and talents. This empowers him or her to **fully participate** at all levels of social, economic and political life. Moreover, in line with Art 14 (3) Charter of Fundamental Rights of the EU, the **parents** have the **right** "*to ensure the education and teaching of their children in conformity with their religious, philosophical and pedagogical convictions*". Guided by these premises, the EU should not only support educational projects addressing the needs of the labour market, but also initiatives focusing on the **integral human development** and **community-building**, such as in the area of non-formal and informal education. COMECE is happy to share the two millennium experience of the Catholic Church, which runs a wide range of educational institutions in Europe and worldwide.

Moreover, the respective funds and programmes should be **better adapted to the needs of people** with **fewer opportunities**. The **budget** for **Erasmus+** should be **adapted** to avoid the current high rejection rates. The **procedures** should be **simplified and more user-friendly** to allow also smaller organisations to benefit from funds and programmes.

Religious heritage is one of the pillars of European **culture** and **identity**. In the **cultural heritage** framework, the EU should therefore explicitly recognise the spiritual, historical, artistic, economic as well as social contribution of religious heritage (material as well as immaterial) and support relevant initiatives through its funding instruments. In light of the fragmentation of our societies, religious heritage and the respective literacy could reinforce a **sense of common belonging** as well as a **spirit of encounter**, **dialogue** and **mutual knowledge**.

Concerning funding **in the area of Fundamental Rights**, the Church recalls the idea that human rights are **universal, indivisible, interdependent and interrelated**. This reference framework, rooted in binding international norms, has to be rediscovered at the Union level, especially in the context of the 70th anniversary of the Universal Declaration of Human Rights. It should inform EU funding instruments for the area of fundamental rights and be encouraged and highlighted in the relevant funded projects.

Churches and religious communities or associations are long-standing prime stakeholders in fostering protection and promotion of **fundamental rights**. Whether or not a faith-dimension is involved, "Human Rights Defenders" should be treated equally with regard to the access to relevant EU funding opportunities.

Work on the different aspects of the prohibition of discrimination is to be supported. An **increased attention** should be devoted **to discrimination on grounds of religion**.

We would encourage the EU to gear funding and policies not towards discrimination "between religions", but on **mapping cases where a person is targeted in an EU Member State because of belonging to a religion or because he/she wants to practices his/her religion**: it is a question of protecting "citizens", not of protecting "religions". Stigmatisation of persons belonging to a religion is also an issue that should be addressed with the support of public authorities.

As **the principle of non-discrimination** entails that discriminating means not only to treat differently similar situations, but also to treat in the same way different situations, EU funding possibilities should be established accordingly.

Both funding devoted to discrimination on grounds of religion and eventual funding having an impact on freedom of religion within the EU should **equally cover persons belonging to majority or minority denominations**. Additionally, more and more emphasis is placed on "accommodation" of religion, to the detriment of proper protection and promotion of the right to freedom of thought, conscience and religion or the prohibition of discrimination on grounds of religion. International public law gives states and public authorities the obligation to equally uphold all fundamental rights. Funding for projects and initiatives should focus on the rights-based approach and strive to highlight the role of religion as a positive factor in society.

Religious literacy is another area in which we see the need for work, both at the national and at the EU level. Religious illiteracy sets the stage for the misuse of religion, including at the political level, to divide societies. Also in the area of fundamental rights literacy, we would see scope for funding support for projects and initiatives in this regard.

The **specificity of the area of disability** should be fully taken into account in funding efforts, as it is already the case according to the current Programme (Article 4(1), point of the REC Regulation).

In the area of **rights of the child**, as already stressed in our 2013 Contribution: "*...the primacy of the role of guidance that a mother and a father share with respect to their children, and their unique position in respect of the protection of the child's best interests, should be prioritised. The interpretation according to which children and their rights can be seen as separate from their family and parents should be rejected. The right of a child to a harmonious upbringing and growth, the protection of his/her psychological integrity and the development of his/her personality, are also dependent on the family, the stable environment where such needs find unparalleled contributions in the loving care of the mother and the father*".

Funding efforts concerning **citizenship** could also contribute to the fight against the phenomenon of **"fake news", stigmatisation and incitement to violence**.

Concerning **consumer protection**, with more specific regard to robotics and artificial intelligence, we would refer to the concerns already expressed on **the issue of attributing legal personality for robots** in our *Contribution to the European Commission consultation on "Rules on liability caused by a defective product"*. The **human person**, **family** and **community** has to be at the **centre of economic policies** and especially regarding **product safety** for the benefit of citizens and as a component of competitive businesses and traders.

As for the name of the future funding programme, we would rather suggest a reference to **"Rights, Equal Access and Citizenship"**, which implies not only principles but also practices centered on the human person.

In the area of Justice, as already underlined in contributing to the previous funding period (2013), funding efforts should comply with Article 67(1) TFEU, according to which *"The Union shall constitute an area of freedom, security and justice with respect for fundamental rights and the **different legal systems and traditions** of the Member States"*.

We would also confirm our support for a consolidated funding for initiatives related to **drug policy**.

In a time of challenges for the European project, COMECE fully supports the **strengthening of the possibilities** offered by the **'Europe for Citizens' Programme** in the forthcoming funding period. This funding instrument has a potential to bring citizens, communities and countries closer to each other in the EU. Funding concerning the promotion and valuing of **common historical memories and remembrance** also plays a key role in that regard. More generally, funding for **cross-border initiatives** should be particularly encouraged.

The current Programme refers to funding for initiatives concerning intercultural dialogue. Increasing plurality and global migration movements raise the **importance of inter-cultural and inter-religious dialogue** in our society. COMECE fully support inter-religious dialogue as a part of social harmony in Europe and a key element to solving some tensions beyond our borders. References to funding for **intercultural dialogue** initiatives should be extended to **explicitly include inter-religious element**. Even if the EU has no legal competence in organising inter-religious dialogue, which is primarily a responsibility of Churches and religious communities, it can build a positive environment and facilitate the gathering of different religious denominations on common points of interest through a **non-discriminatory access** to the respective funding.

The Regulation concerning the current 'Europe for Citizens' Programme (and more vaguely, the one establishing the Rights, Equality and Citizenship Programme) refer to support for "civil society" (cfr. Recital 1 and Article 6 of the EFC Regulation; and Recitals 13 and 35 of the REC Regulation). Taking into account the fact that to consider **Churches and religious associations or communities** as being covered by "civil society" (Article 11 TEU) is not in line with binding EU primary law (Article 17 TFEU), the **specificity** of these entities should be **explicitly recognised** in **the relevant instruments**.

Brussels, 26 February 2018   The Secretariat of COMECE