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

- ☑ Volunteering, humanitarian aid, solidarity
- ☑ Youth work
- ☑ Labour mobility
- ☑ Culture, media and arts
- ☑ Citizenship and values
- ☑ Justice area, judicial cooperation, rights
- ☑ Consumer Protection

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

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

Public Consultation on EU funds in the area of Cohesion

> Fields marked with * are mandatory.

Introduction

[Read the introduction](#)

Guidance

- **Are you replying as a as an individual in your personal capacity**? If so, please tick the first option under question 1. You will then be invited to enter your personal details and then led directly to questions 27 to 40 which relate to EU funds in the area of cohesion.
- **Are you replying as an entity or in your professional capacity**? If so, please tick the second option under question 1. You will then be invited to enter your personal details as well as information on the entity of behalf of which you are replying and then then led directly to questions 27 – 40 which relate to EU funds in the area of cohesion.
- **In both cases, you may skip the non-mandatory questions and upload a document** (1 MB max) under point 41 and enter any other comment under point 42. Please do not include any personal data in documents submitted in the context of the consultation if you opt for anonymous publication. It is important to read the specific privacy statement for information on how your personal data and contribution will be dealt with.

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

> Markus

* 9 Respondent's last name

> Vennewald

* 10 Respondent's professional email address

markus.vennewald@comece.eu

*11 Name of the organisation

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

*12 Postal address of the organisation

Square de Meeûs, 19
Brussels 1050
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

*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.

EU Funds in the area of cohesion

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

at most 6 choice(s)

- ☐ The European Regional Development Fund (ERDF)
- ☑ The Cohesion Fund (CF)
- ☑ The European Social Fund (ESF)
- ☑ The European Globalisation Adjustment Fund (EGF)
- ☑ The Fund for European Aid to the Most Deprived (FEAD)
- ☑ Employment and Social Innovation (EaSI)

28 Please let us know to which of the following one or more topics your replies will refer

at most 3 choice(s)

- ☑ Economic and sustainable development
- ☑ Employment, skills and education
- ☑ Social inclusion

at most 3 choice(s)

- ☑ Economic and sustainable development
- ☑ Employment, skills and education
- ☑ Social inclusion

29 The Commission has preliminarily identified a number of policy challenges which programmes/funds under the policy area of cohesion 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
a. Promote economic growth in the EU as a whole	○	◉	○	○	○	○
b. Reduce regional disparities and underdevelopment of certain EU regions	◉	○	○	○	○	○
c. Address the adverse side-effects of globalisation	◉	○	○	○	○	○
d. Reduce unemployment, promote quality jobs and support labour mobility	◉	○	○	○	○	○
e. Promote social inclusion and combat poverty	◉	○	○	○	○	○
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	○	◉	○	○	○	○

g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	○	◉	○	○	○	○
h. Foster research and innovation across the EU	○	◉	○	○	○	○
i. Facilitate transition to digital economy and society	◉	○	○	○	○	○
j. Promote sustainable transport and mobility	○	◉	○	○	○	○
k. Promote territorial cooperation (interregional, cross-border, transnational)	○	◉	○	○	○	○
l. Support education and training for skills and life-long learning	○	◉	○	○	○	○
m. Improve quality of institutions and administrative capacity	○	◉	○	○	○	○

n. Promote sound economic governance and the implementation of reforms	◯	⦿	◯	◯	◯	◯
o. Other (please give degree of importance here and fill in question 30 below)	⦿	◯	◯	◯	◯	◯

30 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

- Ensure access to necessary resources for all persons residing in the EU
- Combat the root causes of poverty in all its forms (including child poverty or in-work poverty)

31 To what extent do the current programmes/funds successfully address these challenges?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Promote economic growth in the EU as a whole	○	○	●	○	○
b. Reduce regional disparities and underdevelopment of certain EU regions	○	○	●	○	○
c. Address the adverse side-effects of globalisation	○	●	○	○	○
d. Reduce unemployment, promote quality jobs and support labour mobility	○	○	●	○	○
e. Promote social inclusion and combat poverty	○	●	○	○	○
f. Promote common values (e.g. rule of law, fundamental rights, equality and non-discrimination)	○	●	○	○	○
g. Facilitate transition to low carbon and circular economy, ensure environmental protection and resilience to disasters and climate change	○	○	●	○	○
h. Foster research and innovation across the EU	○	●	○	○	○
i. Facilitate transition to digital economy and society	○	●	○	○	○
j. Promote sustainable transport and mobility	○	●	○	○	○
k. Promote territorial cooperation (interregional, cross-border, transnational)	○	●	○	○	○
l. Support education and training for skills and life-long learning	○	●	○	○	○
m. Improve quality of institutions and administrative capacity	○	○	●	○	○
n. Promote sound economic governance and the implementation of reforms	○	○	●	○	○
o. Other (please give degree of importance here and fill in question 32 below)	○	○	●	○	○

32 If you selected 'Other' in the above question, please specify it here:

200 character(s) maximum

> - Reduce disparities between urban and rural regions in Europe

33 To what extent do the current programmes/funds add value, compared to what Member States could achieve at national, regional and/or local levels without EU funds?

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

34 Please explain how the current programmes/funds can 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 answers refer.

> The firm belief of a Europe growing together has been shaken as Member States as well as EU regions have started to diverge in their economic and social development. Cohesion policy helps to restore this promise and ensures a harmonious development of the EU as a whole.
>
> - (1) ESF, EGF and FEAD contribute to the reduction of economic and social inequalities and, to some extent, limit the adverse effects of globalisation and deeper integration in a European single market.
>
> - (2) Especially the ERDF, but also other funds help to exploit the full potential of cross-border cooperation in areas, such as infrastructure development and research and innovation.
>
> - (3) Cohesion policy has played a key role in the achievement of the targets of the ongoing Europe 2020 strategy and therefore helps the EU, its Member States as well as its regions to develop based on common objectives towards a more inclusive, people-centred and low-carbon economy.

35 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 answers refer.

- (1) There is a clear need for more flexibility in EU cohesion policy. The financial and economic crisis has revealed that the current design of the policies and funds is not yet able to face unexpected developments (such as the increase in refugees and migrants) and asymmetric shocks. To this end, funds should be kept available from the beginning of the next MFF period to tackle those unexpected situations. With regard to asymmetric shocks, COMECE encouraged EU institutions in its consultation document on the European Pillar of Social Rights to set-up for the eurozone a complementary European unemployment benefit scheme. As a complement to a national scheme, a common EU fund could stabilise national systems.

- (2) COMECE proposes to further strengthen the link between the funds and the European Semester and to use the principles of the European Pillar of Social Rights as a template for the orientation of the future EU cohesion policy.

- (3) We encourage to simplify rules and to set-up a single set of rules for EU funds. This will not just improve the access to EU funding for smaller organisations and reduce administrative costs, but also ensure the coherence with other funds.

- (4) We recommend adding new criteria that go beyond the objective of social and economic cohesion, such as demographic change, climate mitigation and adaption, migration/integration policies and (youth) unemployment.

36 To what extent do you consider the following as obstacles which prevent the current programmes /funds from successfully achieving their objectives?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Complex procedures leading to high administrative burden and delays	●	○	○	○	○
b. Heavy audit and control requirements	●	○	○	○	○
c. Available funding does not address the real challenges	○	●	○	○	○
d. Insufficient administrative capacity to manage programmes	○	●	○	○	○
e. Insufficient information about funding and selection process	●	○	○	○	○
f. Lack of flexibility to react to unforeseen circumstances	○	●	○	○	○
g. Difficulty of combining EU action with other public interventions	○	○	●	○	○
h. Insufficient synergies between the EU programmes/funds	○	●	○	○	○
i. Difficulty to ensure the sustainability of projects when the financing period ends	●	○	○	○	○

j. Insufficient use of financial instruments	○	○	●	○	○
k. Co-financing rates	○	○	●	○	○
l. Late disbursement of funds / delays in payments to beneficiaries	○	●	○	○	○
m. Insufficient linkages of the Funds with the EU economic governance and the implementation of structural reforms	○	●	○	○	○
n. Legal uncertainty	○	●	○	○	○
o. Insufficient ownership	○	●	○	○	○
p. Insufficient involvement of civil society in design and implementation	●	○	○	○	○
q. Other (please specify below)	○	○	○	○	○

37 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

-

38 To what extent would these steps help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No opinion
a. Alignment of rules between EU funds	○	●	○	○	○
b. Fewer, clearer, shorter rules	○	●	○	○	○
c. More freedom for national authorities to set rules	○	○	●	○	○
d. More flexibility of activity once funding is eligible	○	●	○	○	○
e. More flexibility of resource allocation to respond to unexpected needs	●	○	○	○	○
f. Simplify the ex-ante conditionalities	○	○	●	○	○
g. More effective stakeholders' involvement in the programming, implementation and evaluation	●	○	○	○	○
h. Other (please specify below)	○	○	○	○	○

39 If you selected 'Other' in the above question, please specify it here:

1000 character(s) maximum

-

40 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/funds?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

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. The FEAD and EGF are built on clear objectives and support in particular the most vulnerable people in the EU. Therefore, it should be ensured that attention for the specific aspects and needs related to these different programmes is not lost in big "merger programmes" and that EU funding for such crucial areas is not decreased.

Document upload and final comments

41 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.

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

1500 character(s) maximum

Together with its ecumenical partner Conference of European Churches (CEC), COMECE welcomed the high-level agreement on the European Pillar of Social Rights and encouraged the EU institution to translate the principles into concrete actions using all instruments, including EU cohesion policy.

- As stressed before (cf. Q35), we expect from the EU to use the 20 principles of the Pillar as a guideline for the next MFF. In spite of new funding priorities and a likely decline in the overall budget, the EU should remain committed to its high-level agreement on the Pillar and extend the budget available in the ESF, FEAD, EGF and other related funds in order to ensure a quick implementation of the principles.

- Also in the next MFF period, the EU should earmark at least 20% of the ESF for social inclusion and combating poverty, and it should, moreover, continue to allocate at least 23.1% of the EU Structural and Investments Funds to the ESF.

- Recalling the statement of the Bishops of COMECE on Poverty and Social Exclusion in Europe (2016), we encourage the EU to adhere to the climate and poverty targets of the Europe 2020 strategy and to place the Sustainable Development Goals (SDGs) at the centre of a new agenda for 2030, which is closely interlinked with both, the European Semester and the EU cohesion policy.

Contact

Dana.DJOUDJEV@ec.europa.eu

Public consultation on EU funds in the area of security

Fields marked with * are mandatory.

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.

Promoting the security of its citizens is a major objective of the EU. While many of the tools enhancing the security of all citizens lie in the hands of the Member States, this has been gradually reflected in the use of the EU budget, as well as in other forms of EU action. Security is reflected in a wide range of EU spending programmes. The Internal Security Fund has two strands, one supporting police cooperation,

crime prevention and the fight against serious cross-border crime, including terrorism and violent extremism;[1] the other focused on border management and visa policy.[2] Research and innovation programmes[3] are being increasingly directed to major security challenges such as cybersecurity. As the need for more defence cooperation has become increasingly recognised, the European Defence Fund[4] has been launched, to support cooperation along the full cycle of development of defence capabilities. The Fund will be progressively rolled out and will be used to stimulate joint research and development projects for defence equipment and technologies.

The EU has also developed a variety of tools to show solidarity through supporting the security of people hit by disasters in a variety of ways. The Emergency Support Instrument (ESI)[5] provides assistance and support in the face of natural or man-made disasters with severe wide-ranging humanitarian consequences inside the EU that can overwhelm the capacity of one or several Member States. The Commission has already proposed a major reinforcement of the EU's common civil protection capacity.[6] Finally, the European Union Solidarity Fund responds to major natural disasters by expressing European solidarity with disaster-stricken regions within Europe.[7]

Other financial programmes which support security in the EU include support to nuclear decommissioning [8] of first generation Soviet-design nuclear power plants; the Hercule Programme,[9] to help tackle fraud and corruption affecting the EU's financial interests; and the Pericles 2020 programme to tackle euro counterfeiting.[10]

[1] https://ec.europa.eu/home-affairs/financing/fundings/security-and-safeguarding-liberties/internal-security-fund-police_en
[2] https://ec.europa.eu/home-affairs/financing/fundings/security-and-safeguarding-liberties/internal-security-fund-borders_en
[3] The current Framework Programme for Research and Innovation (HORIZON 2020) identifies the security dimension as one of the major policy drivers with a focus area dedicated to "boosting the effectiveness of the Security Union".
[4] Preparatory Action for Defence Research and European Defence Industrial Development Programme.
[5] http://ec.europa.eu/echo/funding-evaluations/funding-emergency-support_en
[6] https://ec.europa.eu/commission/news/resceu-new-european-system-tackle-natural-disasters-2017-nov-23-0_en: not part of this consultation exercise.
[7] http://ec.europa.eu/regional_policy/en/funding/solidarity-fund/
[8] https://ec.europa.eu/energy/en/topics/nuclear-energy/decommissioning-nuclear-facilities
[9] https://ec.europa.eu/anti-fraud/policy/hercule_en
[10] https://ec.europa.eu/info/business-economy-euro/euro-area/euro/anti-counterfeiting/pericles-2020-programme-exchanges-assistance-training_en

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

Square de Meeûs, 19
Brussels 1050
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

*24   Country of organisation's headquarters

○ Austria
⦿ Belgium

3

- ◉ 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.

- ☐ Internal Security Fund (ISF) – Police
- ☐ Internal Security Fund (ISF) - Borders
- ☑ European Defence Fund
- ☐ Emergency Support Instrument (ESI)
- ☐ Hercule Programme
- ☐ Pericles programme

28 Please let us know to which of the following topics your replies to the questions 32-39 will refer.

- ☑ Internal Security
- ☑ Defence Research and Development
- ☑ Help in emergency situations

EU funds in the area of security

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

	Very important	Rather important	Neither important nor unimportant	Not very important	Not important at all	No opinion
* Fighting cross-border crime, including terrorism, with more cooperation between law enforcement authorities	◉	○	○	○	○	○
* Protection of people, public spaces and critical infrastructure	◉	○	○	○	○	○
* Supporting security at the external border	○	◉	○	○	○	○
* Promoting strong cybersecurity	◉	○	○	○	○	○
* Enhancing cooperation with countries outside the EU	○	◉	○	○	○	○
* Providing humanitarian support in large-scale emergency situations	◉	○	○	○	○	○
* Promoting nuclear safety	○	◉	○	○	○	○

* Supporting defence research and industrial development	○	●	○	○	○	○
* Defending the EU's financial interests	○	○	●	○	○	○
* Other (Please give degree of importance here and fill in the question below)	●	○	○	○	○	○

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

200 character(s) maximum

Promoting long-term Human Security and Sustainable Peace

31 To what extent do the current programmes/funds successfully address these challenges?

	Fully addressed	Fairly well addressed	Addressed to some extent only	Not addressed at all	No opinion
* Fighting cross-border crime, including terrorism, with more cooperation between law enforcement authorities	○	⦿	○	○	○
* Protection of people, public spaces and critical infrastructure	○	○	⦿	○	○
* Supporting security at the external border	○	⦿	○	○	○
* Promoting strong cybersecurity	○	○	⦿	○	○
* Enhancing cooperation with countries outside the EU	○	○	⦿	○	○
* Providing humanitarian support in large-scale emergency situations	○	⦿	○	○	○
* Promoting nuclear safety	○	○	⦿	○	○
* Supporting defence research and industrial development	○	○	⦿	○	○
* Defending the EU's financial interests	○	⦿	○	○	○
* Other (as specified in the previous question)	○	○	⦿	○	○

*32 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 large extent
- ⦿ To some extent only
- ○ Not at all
- ○ No opinion

33 Please specify how 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 answers refer.

Many of the security challenges, such as terrorism or cybercrime, are complex and they are not confined by territorial boundaries. Therefore, the added value of EU programmes may consist in fostering cross-border and cross-sectoral cooperation. In order to have a certain strategic autonomy, the EU should maintain its capacity in terms of military procurement and development of comprehensive economic and financial defence tools, in full respect for the principle of the rule of law and fundamental rights. EU funding shall take into account the increasing mobility within the EU and facilitate the daily life of citizens in terms of administration of justice. Stronger integration of security mechanisms should not be accomplished at the expense of public liberties and principles of the rule of law. In light of the multifaceted security challenges, an integrated approach needs to be taken to address them comprehensively. In line with the EU Integrated Approach to External Conflicts and Crisis, the respective EU funds for internal security should be better articulated with other instruments in order to enhance cross-sectoral coordination (internal/external security-humanitarian-development-trade-economic-ecological, etc...). They might involve different types of actors (civilian, military, state, non-state, civil society, Churches, religious communities, economic actors, etc..) at and across different levels (individuals, families, local communities, society, state, region, etc).

34 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 answers refer.

Security challenges are a key concern for the European citizens. The EU funding should support the development of means to address pertinent security challenges and new vulnerabilities, particularly in the cyber realm, and fill the gaps in the needed defence capabilities in Europe, while preserving democratic practices.

The European Defence Fund should primarily focus on long-term human security and the promotion of sustainable peace in Europe and worldwide. The EU funding for defence research and technology development should fully comply with international legal obligations of both the EU and its Member States. Moreover, it should be ensured that ethically problematic technologies, including lethal autonomous weapons and weapons of mass and indiscriminate destruction are banned from EU funding.
As hard security alone cannot comprehensively address the multifaceted security challenges of today, besides adequate and proportionate investment in the security and defence domain, the EU should increase its support to non-military pre-emptive peace-building initiatives. This should also include measures promoting human, socio-economic and ecological security.

Moreover, security measures, including countering terrorism and violent extremism, should be intrinsically linked to mechanisms ensuring the respect for the rule of law and fundamental human rights.

35 To what extent do you consider the following as obstacles which prevent the current programmes /funds from successfully achieving their objectives?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No Opinion
*Complex procedures leading to high administrative burden and delays	○	●	○	○	○
*Lack of critical mass to address the scale of the needs	●	○	○	○	○
*Insufficient administrative capacity to manage programmes	○	●	○	○	○
*Lack of flexibility to react to unforeseen circumstances or new priorities	●	○	○	○	○
*Difficulty of combining EU action with other public interventions	○	●	○	○	○
*Insufficient focus on performance and results	○	●	○	○	○
*Difficulty to ensure the sustainability of projects when the financing period ends	●	○	○	○	○
*Insufficient use of financial instruments	○	●	○	○	○
*Insufficient involvement of stakeholders	●	○	○	○	○
*Other (please specify below)	●	○	○	○	○

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

1000 character(s) maximum

As security & defence is a global, comprehensive concept, not only military actors and defence industries should be regarded as relevant stakeholders with regard to respective EU programmes. Also social, economic, development, humanitarian, etc.. actors should be included as relevant stakeholders.

37 To what extent would these steps help to further simplify and reduce administrative burdens for beneficiaries under current programmes/funds?

	To a large extent	To a fairly large extent	To some extent only	Not at all	No Opinion
*Better defined and more focused funding priorities	○	●	○	○	○
*Broader categories of eligible funding	○	○	●	○	○

*Simpler application and reporting procedures	○	○	●	○	○
*Alignment of rules between EU funds	○	●	○	○	○
*Fewer, clearer, simpler rules	○	●	○	○	○
*More flexibility of activity once funding is eligible	○	○	●	○	○
*More reliance on national rules	○	○	●	○	○
*Other (please specify below)	○	○	○	○	●

39 How could synergies among programmes/funds in this area be further strengthened to avoid possible overlaps/duplication and strengthen coherence? For example, would you consider grouping/merging some programmes?

1500 character(s) maximum

Please clearly indicate to which policies, programmes and funds your answers refer.

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. However, it should be ensured that attention for the specific needs related to different areas, e. g. protection of people, humanitarian action, cybersecurity, etc. is not lost in big "merger programmes" and that EU funding for such crucial areas is not decreased. As mentioned above in the reply to question 33, it would be desirable to strengthen effective links between various policy fields and instruments (such as internal/external security, humanitarian, development, trade, economic, social or ecological policies) with a view to fostering human security and sustainable peace environment in Europe and globally. This should lead to a more coherent articulation and better coordination between the different instruments without undermining the specificities of each tool. An intensified and more systematic exchange between the various services of the European institutions based on a shared analysis and clear long-term strategic objectives could substantially contribute to this goal.

Document upload and final comments

40 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.

6c5c41e1-5b1b-4fc8-b142-b7daf269ff7b/Additional_elements_Security.pdf

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

1500 character(s) maximum

Some further considerations complementing the elements provided in this questionnaire are provided in the attached document.

Contact

HOME-MFF-POST2020@ec.europa.eu

Complementary elements concerning the public consultation on

"EU funds in the area of security"

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

1. Defence research and technology development

Security is perceived as one of the **key concerns for the European citizens** today. It is therefore of key importance to develop means to address **pertinent security challenges and new vulnerabilities**, particularly in the cyber realm, and fill the gaps in the needed defence capabilities in Europe. In order to properly address **cybersecurity** of **EU citizens** and **democratic principles**, the EU funding should support the development of **legal tools** in parallel with **technical** ones.

The EU Defence Fund should **primarily focus on long-standing human security and sustainable peace**, instead of being solely driven by short-term business interests of defence industries. **European taxpayers' money** should be spent in a **transparent and accountable** way in order to enhance the **long-term security of citizens** and to promote **sustainable peace environment** globally. For ensuring **democratic control**, adequate **monitoring and reporting** mechanisms should be put in place.

The EU funding for defence research and technology development should **fully comply with international legal obligations** of both the EU and its Member States. Technologies and weapons that are not compatible with the **legal standards of international human rights law, international humanitarian law** as well as of **arms control, disarmament and non-proliferation** regulations must not be supported under the EU Defence Fund.

Moreover, it should be ensured that **ethically problematic technologies**, including lethal autonomous weapons and weapons of mass and indiscriminate destruction are **banned** from EU funding.

Increase of technological sophistication of weapons tends to **disproportionately affect the civilian population.** Weapons enabling **lethal actions without meaningful human control** pose **major legal and human security concerns.** Such weapons have significantly expanded violations of the **rule of law** through the practice of **extrajudicial killings** over the past decade. Moreover**,** the **de-humanisation** and **de-responsibilisation** in performing lethal actions raises **grave ethical questions** (cf. Caritas in Veritate Foundation: "*The Humanization of Robots and the Robotization of the Human Person*").

In order to ensure compliance of EU funding with the above-mentioned concerns, an **advisory body** could be established which would elaborate **ethical and legal guidelines** for defence research and technology development. Being present in the field as well as having extensive experience at the academic level, **Churches and religious communities** could provide an important **contribution** in this regard.

The EU funding for security should comply with the requirements of **proportionality** and **adequacy**. In view of the post-2020 Multiannual Financial Framework, an **adequate balance**

for allocation of resources needs to be found **without undermining other fields** of EU's External Action, notably Development cooperation.

Hard security alone cannot **comprehensively** address the **multifaceted security challenges** for the EU. Thus, besides **adequate** and **proportionate** investment in the security and defence domain, the EU should increase its support to non-military *__pre-emptive peace-building__* initiatives. This should also include measures promoting **human**, **socio-economic** and **ecological** security.

2. Security and the Rule of Law

Cross-border crime, including **terrorism** and **violent extremism**, are a **serious security threat** and a **concern to European citizens**. It should however be highlighted that often, these criminal actions, including terrorism, **play on people's fears** and provoke **counter-measures** that might pose a **challenge to the rule of law** and **civil liberties**.

True security must be bound with **respect for the rule of law** and **fundamental human rights**. If not focusing on **human security**, including the enforcement of the rule of law and public liberties, merely technical security measures may allow or even lead to new conflicts.

COMECE promotes a **rights-based approach** which goes beyond the emotions of public opinion and respects the **fundamental rights of persons, families and communities** within internal EU policies as well as in relations with third countries. In the context of EU funding for initiatives addressing terrorism and other forms of cross-border crime, a particular attention should be given to the articulation of these measures with regard to the **rule of law,** the **principle of the hierarchy of norms** and the **administration of justice**.

Brussels, 23 February 2018   The Secretariat of COMECE

ACT Alliance EU
28, Boulevard Charlemagne, BE-1000 Bruxelles

JRS-Europe – Jesuit Refugee Service Europe 205, Chaussée de Wavre, BE-1050 Bruxelles

CCME – Churches' Commission for Migrants in Europe 174, Rue Joseph II, BE-1000 Bruxelles

ICMC – International Catholic Migration Commission
50, Rue Washington, BE-1050 Bruxelles

COMECE – Commission of the Bishops' Conferences of the European Union (Secretariat)
19, Square De Meeus, B-1050 Bruxelles

Brussels Office of the Protestant Church in Germany (EKD)
166, Rue Joseph II, BE-1000 Bruxelles

Don Bosco International 8, Clos André Rappe, BE-1200 Bruxelles

QCEA – Quaker Council for European Affairs 50, Square Ambiorix, BE-1000 Bruxelles

Eurodiaconia 166, Rue Joseph II, BE-1000 Bruxelles

Contribution to the Public Consultation on EU funds in the area of migration

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 if 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

Public consultation on EU funds in the area of investment, research & innovation, SMEs and single market

> Fields marked with * are mandatory.

Public consultation on EU funds in the area of of investment, research & innovation, SMEs and single market

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 systems and developing rural areas; ensuring a clean and healthy environment and the protection of natural resources; 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 EU has developed a variety of instruments to stimulate investment and entrepreneurship to create jobs and growth. The Investment Plan for Europe, the so-called Juncker Plan, aims to unlock investment throughout Europe through to the European Fund for Strategic Investments (EFSI), which provides a EU guarantee to mobilise investment. The EFSI also complements other existing instruments like COSME that make it easier for small and medium-sized enterprises (SMEs) to access finance in all phases of their lifecycle – creation, expansion, or business transfer. Through EU support, businesses have easier access to guarantees, loans and equity capital.

Research and innovation are instrumental for addressing the EU's productivity gap and play a crucial role in providing solutions to many global challenges the EU and its citizens are facing today. In that context, the EU has made a major contribution with the Horizon 2020 programme.

The European Single Market is one of the EU's greatest achievements. It has fuelled economic growth and made the everyday life of European businesses and consumers easier. A well-functioning Single Market, including in its digital dimension, stimulates competition and trade, improves efficiency, raises quality, and helps cut prices. In that context, the EU has set up several programmes in a wide range of areas (health, food safety, customs…) to facilitate the free circulation of goods, services, capital and persons across the European continent.

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 current process for the future MFF.

Link to portal for recent consultations:
https://ec.europa.eu/info/consultations_en

Interim evaluation of the programme for the competitiveness of enterprises and small and medium-sized enterprises (COSME) (2014-2020)
https://ec.europa.eu/info/consultations/interim-evaluation-programme-competitiveness-enterprises-and-small-and-medium-sized-enterprises-cosme-2014-2020_en

Consultation on modernising and simplifying the common agricultural policy (CAP)
https://ec.europa.eu/agriculture/consultations/cap-modernising/2017_en

Public stakeholder consultation – interim evaluation of Horizon 2020
https://ec.europa.eu/research/consultations/interim_h2020_2016/consultation_en.htm

Open Public Consultation of the mid-term evaluation of the 3rd Health Programme 2014-2020
https://ec.europa.eu/health/programme/consultations/midterm_evaluation_fr

Public stakeholder consultation – Interim evaluation of Joint Undertakings operating under Horizon 2020.
http://ec.europa.eu/research/consultations/interim_joint-undertakings_h2020/consultation_en.htm

Public Consultation – Evaluation of Public-Public Partnerships (Art.185 initiatives) in the context of the Horizon 2020 Interim Evaluation.
http://ec.europa.eu/research/consultations/pp_partnerships_art185/consultation_en.htm

Public consultation on Transformation of Health and Care in the Digital Single Market
https://ec.europa.eu/info/consultations/public-consultation-transformation-health-and-care-digital-single-market_en

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

> Friederike

*9   Respondent's last name

> Ladenburger

*10   Respondent's professional email address

> ethica@comece.eu

*11   Name of the organisation

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

*12   Postal address of the organisation

> Square de Meeûs, 19
> Brussels 1050
> 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

*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,

◉ **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)

- ☐ European Fund for Strategic Investments (Investment Plan for Europe)
- ☑ Horizon 2020
- ☐ European Structural and Investment funds
- ☐ COSME
- ☑ EU Health Programme
- ☑ EU Food and Feed Programme
- ☐ Customs 2020
- ☐ Fiscalis
- ☐ Anti-Fraud Information System
- ☐ EURES
- ☑ Employment and Social Innovation Programme
- ☐ Standards in the field of financial reporting Programme
- ☐ Implementation of single market for financial services
- ☐ Enhancing consumers involvement in EU policy-making in the field of financial services
- ☑ Consumer Programme
- ☐ European statistical programme
- ☐ Interoperability solutions and common frameworks for European public administrations, businesses and citizens (ISA2 programme) as a means for modernising the public sector
- ☑ Support for the functioning of various aspects of the single market (including goods, services, taxation, company law) – standardisation, assistance to citizens and businesses, enforcement
- ☑ Digital Single Market support programme
- ☑ EEEF (European energy efficiency fund)
- ☐ PF4EE (private finance for energy efficiency)
- ☐ None of the above

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

- ☑ EU support for Investment
- ☑ EU support for research and innovation
- ☑ EU support for SME and entrepreneurship
- ☑ EU support for the Single Market

EU funds in the area of investment, research & innovation, SMEs and single market

29 The Commission has preliminarily identified a number of policy challenges which programmes/funds in this area of investment, research & innovation, SMEs and single market 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
Facilitate transition to low carbon and circular economy and resilience to climate change, support security of supply	●	○	○	○	○	○
Foster research and innovation across the EU	●	○	○	○	○	○
Support industrial development	○	●	○	○	○	○
Support education, skills and training	●	○	○	○	○	○
Ensure a clean and healthy environment and the protection of natural resources	●	○	○	○	○	○
Facilitate digital transition of the economy, industry, services and society	●	○	○	○	○	○

	1	2	3	4	5	6
Ensure that existing rules are applied and enforced consistently across the EU	○	◉	○	○	○	○
Ensure smooth circulation of goods both within EU and at EU borders	○	◉	○	○	○	○
Ensure fair conditions of competition in the EU	○	◉	○	○	○	○
Promote security of citizens	◉	○	○	○	○	○
Support labour mobility	○	◉	○	○	○	○
Support capital flows and investment	○	○	◉	○	○	○
Facilitate access to finance, in particular to SMEs	○	◉	○	○	○	○
Promote financial stability	○	◉	○	○	○	○
Improve quality of public institutions (including digitalisation)	○	◉	○	○	○	○
Reduce unemployment and social disparities	◉	○	○	○	○	○

Ensure safe, sustainable transport and mobility	○	●	○	○	○	○
Promote and protect public health	●	○	○	○	○	○
Promote a safe and sustainable food chain	●	○	○	○	○	○
Support social investment and social innovation	●	○	○	○	○	○
Ensure a high level of consumer protection and effective redress	●	○	○	○	○	○
Provide reliable and comparable statistics	○	●	○	○	○	○
Other (Please specify below)	○	○	○	○	○	○

31 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
Facilitate transition to low carbon and circular economy and resilience to climate change; support security of supply	◎	◎	◉	◎	◎
Foster research and innovation across the EU	◉	◎	◎	◎	◎
Support industrial development	◎	◉	◎	◎	◎
Support education, skills and training	◎	◉	◎	◎	◎
Ensure a clean and healthy environment and the protection of natural resources	◎	◉	◎	◎	◎
Facilitate digital transition of the economy, industry, services and society	◎	◉	◎	◎	◎
Ensure that existing rules are applied and enforced consistently across the EU	◎	◎	◉	◎	◎
Ensure smooth circulation of goods both within EU and at EU borders	◎	◉	◎	◎	◎
Ensure fair conditions of competition in the EU	◎	◉	◎	◎	◎
Promote security of citizens	◎	◉	◎	◎	◎
Support labour mobility	◎	◉	◎	◎	◎
Support capital flows and investment	◎	◉	◎	◎	◎
Facilitate access to finance, in particular to SMEs	◎	◉	◎	◎	◎
Promote financial stability	◎	◉	◎	◎	◎
Improve quality of public institutions (including digitalisation)	◎	◉	◎	◎	◎
Reduce unemployment and social disparities	◎	◉	◎	◎	◎

Ensure safe, sustainable transport and mobility	○	◉	○	○	○
Promote and protect public health	○	◉	○	○	○
Promote a safe and sustainable food chain	○	◉	○	○	○
Support social investment and social innovation	○	○	◉	○	○
Ensure a high level of consumer protection and effective redress	○	◉	○	○	○
Provide reliable and comparable statistics	○	◉	○	○	○
Other (please specify below)	○	○	○	○	○

*33 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

34 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. Please clearly indicate to which policies, programmes and funds your answer refer.

1500 character(s) maximum

> Cross-border economic and social realities are better addressed at EU level. Programmes and funds like Horizon 2020 and the EU Health Programme promote international exchange of expertise for very complex and current problems of Europe today. Exchange between international scientists and medical experts for complex innovation programs is necessary for building up an excellency in research for creating very high standards in research and health.
> Cross-border exchange is a reality leading to the Digital Single Market Support Programme. Digitalisation cannot be seen only under a national or regional approach. The many different questions of digitalisation related to the EU Single Market and to the development of infrastructures linked to cross-border activities have to be addressed for the benefit of citizens in full respect of their fundamental rights and freedoms.

35 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? Please clearly indicate to which policies, programmes and funds your answer refer.

1500 character(s) maximum

> The Ethics Appraisal Procedure is obligatory for all activities funded by the European Union under Horizon 2020. It should ensure that all research activities are conducted in compliance with fundamental ethical principles. The first step of an ethical self – assessment of the applicant can be seen as a reasonable,

general focus on the compliance with ethical rules and standards. But the following steps of Ethics Screening and Ethics Assessment – done by external ethics experts – show the result that the number of ethics requirements (divided into two phases : during grant preparation and during the ongoing project) which are demanded during the ongoing project is quite small. A reinforcement of the ethical assessment procedures should be considered.

36 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 possible obstacles prevent the current programme/funds from achieving their objectives?

	To a large extent	To a fairly large extent	To some extent only	Not at all	Don't know
Too complex procedures leading to high administrative burden and delays	◉	○	○	○	○
Insufficient administrative capacity to manage programmes	○	◉	○	○	○
Lack of flexibility to react to unforeseen circumstances	○	○	◉	○	○
Insufficient synergies between the EU programmes/funds	○	◉	○	○	○
Difficulty of combining EU action with other public interventions and private finance	○	○	◉	○	○
Insufficient critical mass	○	○	◉	○	○
Insufficient use of financial instruments	○	◉	○	○	○
Lack of information/communication	◉	○	○	○	○
Insufficient scope	◉	○	○	○	○
Lack of EU standards and EU rules	○	○	◉	○	○
Inadequate facilities to support enhanced cooperation	○	○	◉	○	○
Out of date and inadequate IT capabilities	○	○	◉	○	○
Insufficient involvement of citizens	○	◉	○	○	○
Other (Please specify below)	○	○	○	○	○

38 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
Alignment of rules between EU funds	●	○	○	○	○
Fewer, clearer, shorter rules	●	○	○	○	○
More reliance on national rules	●	○	○	○	○
A stable but flexible framework between programming periods	○	●	○	○	○
Extension of the single audit principle	●	○	○	○	○
Better feedback to applicants	●	○	○	○	○
More structured reporting	○	●	○	○	○
User-friendly IT tools	○	●	○	○	○
E-governance	●	○	○	○	○
Adequate administrative capacity	○	●	○	○	○
Other (Please specify below)	○	○	○	○	○

40 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? Please clearly indicate to which policies, programmes and funds your answer refer.

1500 character(s) maximum

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. However, it should be ensured that attention for the specific needs related to different areas, e. g. health, innovation, digitalisation, research etc. is not lost in big "merger programmes" and that EU funding for such crucial areas is not decreased. Especially under the aspect of the Ethics Appraisal Procedure, which is necessary for activities funded in Horizon 2020, merger programmes could develop the risk of losing an intense and specified control of ethical issues. The division of the Ethics Appraisal Procedure in three steps shows the importance of an intense, specified control of ethical issues.

Document upload and final comments

41 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.

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

1500 character(s) maximum

> 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 healthcare and research. 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.
> It is also very important to underline the important impact of Churches, their institutions as well as other religious associations or communities for the general ethical background of the Ethics Appraisal Procedure of activities funded by the European Union. The Ethics Review carried out by independent ethics experts and /or qualified staff working in a panel cannot be done without this general ethical background.

Contact

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