EUROPE FOR CITIZENS
(2014-2020)
EUROPE FOR CITIZENS (2014-2020)
NOTE

Abstract

This note seeks to provide a concise overview and critical assessment of the proposed Europe for Citizens programme 2014-2020, which aims to enhance remembrance and civic participation in Europe. Based on an outline of past “active citizenship” initiatives on a European level and the Europe for Citizens programme currently in force, the genesis of the Commission’s new proposal, its content, and its reception by other EU-institutions and stakeholders are analysed. The respective strengths and weaknesses are also examined, followed by a series of recommendations to revise the legislative proposal.
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<th>Description</th>
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<tr>
<td><strong>CEMR</strong></td>
<td>Council of European Municipalities and Regions</td>
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<td><strong>CIVEX</strong></td>
<td>Commission for Citizenship, Governance, Institutional and External Affairs</td>
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<td><strong>CoR</strong></td>
<td>Committee of the Regions</td>
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<td><strong>CULT</strong></td>
<td>Committee on Culture and Education</td>
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<td><strong>DG COMM</strong></td>
<td>Directorate General for Communication</td>
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<td><strong>EACEA</strong></td>
<td>Education, Audiovisual and Culture Executive Agency</td>
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<td><strong>ECP</strong></td>
<td>Europe for Citizen Point</td>
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<td><strong>EEA</strong></td>
<td>European Economic Area</td>
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<td><strong>EESC</strong></td>
<td>European Economic and Social Committee</td>
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<td><strong>EFTA</strong></td>
<td>European Free Trade Association</td>
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<td><strong>EP</strong></td>
<td>European Parliament</td>
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<td><strong>EU</strong></td>
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<td><strong>EUR</strong></td>
<td>Euro</td>
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<td><strong>JURI</strong></td>
<td>Committee on Legal Affairs</td>
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<td><strong>TEC</strong></td>
<td>Treaty Establishing the European Community</td>
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<td><strong>TEU</strong></td>
<td>Treaty on the European Union</td>
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<td><strong>TFEU</strong></td>
<td>Treaty on the Functioning of the European Union</td>
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EXECUTIVE SUMMARY

This note sets out to provide a concise overview and critical assessment of the proposed Europe for Citizens programme 2014-2020, which aims to enhance remembrance and civic participation in Europe. The Note comprises the following constitutive parts:

1) an introduction outlining past “active citizenship” initiatives and the Europe for Citizens programme currently in force;
2) a summary of the Commission’s proposal for a renewed Europe for Citizens programme;
3) a brief overview of the reception of the proposal by the EESC, CoR and Council, as well as the legislative involvement of the EP;
4) an examination of the proposed programme in terms of strengths and weaknesses; and
5) a series of recommendations for revising the existing legislative proposal.

ad 1) Introduction:

Following calls made both at the Tampere (1999) and Nice European Council (2000) for a more open dialogue with civil society, a first Community action programme to promote Active European Citizenship was initiated by the European Council in January 2004 (Council Decision 2004/100/EC). In the wake of the failure of the Constitution for Europe project, Active European Citizenship was succeeded by the programme Europe for Citizens, established by Decision 1904/2006/EC of the European Parliament (EP) and the Council for the period 2007 to 2013 with an overall financial envelope of EUR 215 million.

In order to meet its objectives, four main types of action have been implemented within the Programme since 2006:

Action 1: “Active Citizens for Europe”, encompassing two key measures, namely:
   I. town twinning and networking of twinned towns, designed to establish links at local level between twinned municipalities for fostering exchanges and cooperation;
   II. citizens’ projects and support measures, exploring innovative methods of citizens’ participation.

Action 2: “Active Civil Society in Europe”, providing (structural) support for civil society organisations and think tanks that link citizens and the European Union (EU).

Action 3: “Together for Europe”, comprising three sets of measures:
   I. high-visibility events and Europe-wide conferences designed to increase Europeans’ sense of belonging to the same community;
   II. studies allowing for a better understanding of active citizenship at European level;
   III. information and dissemination tools.

Action 4: “Active European Remembrance”, aimed to promote and preserve active European remembrance, specifically by sponsoring projects designed to commemorate the victims of National Socialism and Bolshevism.

The mid-term evaluation of Europe for Citizens 2007-2013, carried out in 2010, confirmed the relevance of the Programme and suggested a clear added value. At the same time, however, reference was made to a number of shortcomings and problems, including a considerable level of unmet demand. To remedy them, a series of recommendations were made for a possible successor programme, which can be summarised as follows:

1) Achieving stronger understanding and ownership of the EU by strengthening links between the Programme on the one hand, major societal issues and the EU’s major strategic goals and political priorities on the other;
2) **Further improving and adjusting the programme implementation**, among other things by finding a better balance between supporting major stakeholders and small-scale participants, increasing funding for Active European Remembrance and Active Civil Society Actions, and facilitating the application process;

3) **Achieving more balanced participation** by making an effort both to counterbalance existing geographical discrepancies and increase the involvement of “hard-to-reach” groups;

4) **Increasing the policy and media impact of activities supported by the Programme.**


The “Proposal for a Council Regulation establishing for the period 2014-2020 the programme ‘Europe for Citizens’” was formally adopted in December 2011 (COM(2011) 884 final). “**Strengthening remembrance and enhancing capacity for civic participation at the Union level**” (p. 3) is defined as the principle objective of the proposed Programme. This general objective is broken down into two specific ones, namely to:

a) Stimulate debate, reflection and cooperation on remembrance, Union integration and history;

b) Develop citizens’ understanding and capacity to participate in the EU policy-making process and develop opportunities for solidarity, societal engagement and volunteering at EU level.

To address these objectives, two main programmatic strands are envisaged:

a) **Remembrance and European Citizenship**

b) **Democratic Engagement and Civic Participation**

Horizontal activities for analysis and dissemination of the project results (“**Valorisation**”) supplement these two strands, under which a series of actions are planned to be supported: citizens’ meetings and town twinning, support for organisations of a “general European interest”, and debates and studies on defining moments in European history, to mention but a few. Access to these actions is declared open to “all stakeholders promoting European integration” (Art. 6 of the Draft Regulation).

Regarding the implementation of the Programme (Art. 8), the adoption of annual work programmes by the Commission is foreseen, while the key role of the Education, Audiovisual and Culture Executive Agency (EACEA) as the main management body is affirmed. In order to allow for efficient monitoring, a number of indicators are specified, against which progress of the Programme and achievement of the specific objectives will be measured (e.g., number of projects and quality of results, number of directly involved participants, or percentage of first time applicants).

The global budget foreseen for the Programme is EUR 229 million, **EUR 206 million** of which are operational appropriations. The remaining EUR 23 million are reserved for “appropriations of an administrative nature”, to which is added EUR 10.423 million not directly included in the budget but set aside in Heading 5 of the Multiannual Financial Framework (“Administration”), thus raising the global administrative expenditures to EUR 33.423 million.

Within the operational appropriations, the total of EUR 206 million is attributed to the three main lines of action as follows:

- **EUR 42.60 million (20.68%)** to Action No. 1 (“Raise awareness on remembrance, Union history, identity and aim by stimulating debate, reflection and networking”);
- EUR 139.45 million (67.69%) to Action No. 2 ("Encourage democratic and civic participation of citizens at Union level, by developing citizens’ understanding of the Union policy-making process and promoting opportunities for social engagement and volunteering at Union level");
- EUR 23.95 million (11.63%) to Action No. 3 ("Analysis, dissemination and valorisation of project results").

**ad 3) Reception of the Proposal by EESC, CoR and Council, and Legislative Involvement of the EP:**

The European Social and Economic Committee (EESC) strongly favours a continuation of the Europe for Citizens programme on the basis of the Commission’s proposal, while calling for a stronger involvement of the EP, the EESC and the Committee of the Regions in framing, monitoring and evaluating the Programme (SOC/458 – EESC/2012/1583). The EESC’s main concern regarding the legislative proposal in its present form is the lack of a sufficient financial envelope.

The Committee of the Regions (CoR) also expressed general support for the legislative proposal while asking for more active involvement of external stakeholders (CoR 13/2012). Unlike the EESC, the CoR considers the financial envelope proposed by the Commission as sufficient. Referring to the success of existing schemes, it calls for a good part of the overall budget to be dedicated to town-twinning activities.

Following the report of its Permanent Representatives Committee, the Council reached a partial general approach on the Commission’s proposal in May 2012. In line with the EESC and the CoR, the Council welcomes the Commission’s proposal, and praises the simplification of the Programme structure in particular. Nevertheless, a number of changes to the original proposal are suggested, concerning 1) the activities to be funded under the Programme, 2) access to the Programme, 3) implementing provisions, and 4) indicators to measure the impact of the Programme.

The Commission’s Proposal declares Article 352 TFEU (Treaty on the Functioning of the European Union) the sole legal basis for the envisaged Regulation on a new Europe for Citizens programme, thus providing for a consent procedure giving the EP only the choice of accepting or rejecting, but not amending the Council’s position. Efforts from the Parliament’s side to change to a dual legal basis involving both Art. 167 and Art. 352 TFEU, thus providing for an ordinary legislative procedure, have as yet been to no avail. Despite the Parliament’s Legal Service arguing otherwise, Commission and Council consider the objective of “Remembrance and European Citizenship” incidental to that of “Democratic engagement and civic participation”, hence forbidding the application of a dual legal basis. The Parliament decided nonetheless to 1) proceed with a “virtual codecision procedure” by preparing a formal report including recommendations for modifications and amendments, and 2) make its approval of the final version dependent on the Council’s willingness to compromise.

**ad 4) Evaluation of the Proposed Programme:**

**Underlying concept of “citizenship”:**

The Commission’s proposal is based on a civic-republican conception of citizenship that emphasizes man’s political nature, and sees citizenship as an active process. While the aim of encouraging a culture of participation is to be welcomed, the one-dimensional and overly instrumental idea of what active citizenship and citizens’ involvement stands for gives reason for concern. Such an idea is manifest in the tailoring of the entire Europe for Citizens programme towards EU policies and especially the policy-making process. Thereby the EU exposes itself to possible criticism that after all, Europe for Citizens was not meant to promote a rich and diverse culture of active citizenship, but designed as a mere means for the self-staging of the EU institutions.
Programme design:
The programme design in its present form appears asymmetrical, with the Remembrance strand clearly subordinate to the Civic Participation strand: while only around 20% of the overall operational appropriations are budgeted for the former, more than two thirds are reserved for the latter. An imbalance can also be observed concerning the thematic focus in the two strands. This goes in particular for the Remembrance part, where focus of attention is almost exclusively on the causes of totalitarian regimes in Europe’s modern history and their victims. Reducing European remembrance to National Socialism and Bolshevism not only fosters a one-dimensional historical understanding, but is also detrimental to the creation of a critical European public and does not do justice to the achievements of European integration since the late 1940s either. Accordingly, the range of projects to be supported under the Remembrance strand of Europe for Citizens should be widened. The design of the second strand of the Programme appears more balanced than that of the first, but would nevertheless profit from a more detailed outline of the extent to which the suggested instruments are suitable to reach the formulated objectives, and which respective added value one particular action might have vis-à-vis others.

Programme management and usability:
After the implementation of a series of simplification measures, the management structures of the current Europe for Citizens programme, which are supposed to be taken over for the new Programme, seem adequate and sufficiently efficient. Unlike the programme management suggested for Europe for Citizens 2014-2020, its usability appears deficient. Some progress has certainly been made in the current programme as to the application process, but no satisfactory solutions are evident in the legislative proposal regarding two other challenges raised in the mid-term evaluation: 1) finding a better balance between supporting major stakeholders and small-scale participants, 2) achieving more balanced participation in terms of geographical discrepancies and involvement of “hard-to-reach” groups. A key tool to address these challenges would seem to be an ambitious communication strategy that raises public awareness for the Programme throughout Europe and especially the opportunities given to non-institutional applicants and small-scale initiatives.

Budget:
The financial envelope for Europe for Citizens 2014-2020 appears insufficient taking the ambitious objectives into account, which are to be achieved. The budget does not only fail to get close to the symbolic “one Euro per citizen”, or a total of EUR 495 million, which had been requested among others by the Council of European Municipalities and Regions (CEMR), but it does not even match the financial envelope of the current Europe for Citizens programme, if the amount is inflation-adjusted. Against this background, a considerable increase of the financial envelope, as requested also in the Opinion of the EESC, would seem commendable.

ad 5) Recommendations and Conclusions:
1) Acknowledgement of the overall importance of a renewed Programme:
Considering the success of the current Europe for Citizens programme (2007-2013) and the fact that it is at present the only one devoted exclusively to promoting civic participation and active remembrance on a European level, continuing the Programme in one form or another seems highly recommended. Consequently, pros and cons of a wholesale rejection of the legislative proposal by the EP would have to be most carefully weighted even in the case of the Council refusing to take the Parliament’s possible suggestions for amending the draft Regulation into due consideration.

2) Widening of the underlying concept of “citizenship”:
Widening the understanding of citizenship underpinning the legislative proposal seems necessary. As yet, an essentially instrumental idea of what citizenship signifies and is to be directed to is prevalent, focusing predominantly on EU policies and the policy making
process. Such an understanding is negligent of the many forms civic participation and public spirit can beneficially take. Allowing for a broader idea in the final proposal of what “citizenship” stands for would also be in the self-interest of the European Institutions in order to avoid the Programme being branded as a propaganda tool of the EU.

3) **Correction of existing imbalances in the programme design:**
In order to remedy existing imbalances in the programme design and avoid the impression of one of the two thematic strands being a mere addition to the other, a more balanced distribution of funds would be required. Such a shift would also underpin the EP’s argument for the application of a dual legal basis with regard to the legislative proposal. Moreover, the present programme design asks for adaptations of the thematic focus, especially within Strand one (Remembrance), where subject matter and timeframe ought to be expanded beyond National Socialism and Bolshevism.

4) **More consistent consideration of the mid-term evaluation results:**
Even though the mid-term evaluation has left its marks in the new legislative proposal, a more conscious consideration of the suggestions made in the former would be desirable. This goes in particular for strengthening links to major societal issues perceived by citizens as being of direct interest to them, and achieving a more balanced participation in the Programme.

5) **Maintenance of centralised management structures while strengthening ECPs:**
In comparison to other programmes centrally administered by an executive agency under the Commission’s supervision, the current Europe for Citizens programme can refer to pretty efficient management structures. Decentralisation is not expected to lead to any savings, nor is it evident that this would result in any qualitative improvements. What seems more promising than a decentralisation of the programme management is upgrading the “Europe for Citizens Points” (ECPs). Such would strengthen the anchoring of Europe for Citizens in the individual member states and contribute to the Programme’s general renown and accessibility at the same time.

6) **Increase of the Programme’s usability:**
A further increase of the future Programme’s usability especially for individual citizens ought to be envisaged. To this aim, clear incentives for small-scale and bottom-up initiatives should be given, and a certain percentage of funds could be reserved for such non-institutional initiatives. In addition, more attention needs to be paid to the more active involvement of “hard-to-reach” groups, which is declared an objective with as yet no corresponding strategy to reach it.

7) **Stronger emphasis on communication and targeted use of the related budget:**
Acknowledging the key importance of an adequate communication strategy for the success of the Programme, the role of communication should be emphasised more decidedly in the Regulation. To avoid any dissipation and potential misappropriation of the funds foreseen for communication actions, the use of these funds for the Commission’s general communication policy should be ruled out.

8) **Increase of financial envelope:**
A considerable increase of the overall financial envelope for Europe for Citizens should be sought. Such an increase seems justifiable if the key role the Programme assumes in Europe’s “civic education” and the bonding of the EU with its citizens is put in relation to the size of Europe for Citizens, which is negligible compared to other programmes and the EU budget in general.
1. INTRODUCTION: EUROPE FOR CITIZENS IN THE PAST

Fostering civic participation has long been a main concern of European politics and the European Union (EU), and as such an integral part of past and present political programmes and initiatives. Since the turn of the millennium, running in parallel to the enlargement and institutional reorganisation of the Union, an important change in the concept of European citizenship has taken place. There is now growing awareness that “active citizenship” is a crucial element in strengthening and safeguarding the process of European integration.

As early as in 1999, the Tampere European Council stressed that the sphere of freedom, security and justice should be based on the principle of democratic control, involving open dialogue with civil society. The Nice European Council later recognised the need to improve and monitor the democratic legitimacy and transparency of EU institutions in order to bring them closer to the citizens of the Member States. The Council Decision 2004/100/EC of 26 January 20041 finally initiated the first Community action programme to promote Active European Citizenship (2004-2006), mainly aiming to contribute to the operating costs of organisations working in the field of civic participation and to promote measures to achieve the Union’s objectives in that field. The total budget of this programme amounted to EUR 72 million.

The failure of the ambitious “Constitution for Europe” project, the deathblow to which was dealt by the rejection of the draft text in France and the Netherlands in the 2005 referenda, was not least due to ever increasing public disenchantment with and criticism of European (Union) high politics, seen as detached from its citizens.2 These factors underlined the need for decisive political action to be taken. Thus, a new all-encompassing programme was launched in December 2006 by Decision 1904/2006/EC of the European Parliament (EP) and of the Council, establishing for the period 2007 to 2013 the programme Europe for Citizens.3 The programme had originally been entitled “Citizens for Europe” but was later changed to better reflect the goal (EU-)Europe had set itself, that is to reach out to “its” public. This new Programme put in place the legal framework to support a wide range of activities and organisations promoting “active European citizenship”, that is the involvement of citizens and Civil Society Organizations in the process of European integration. It originally encompassed all the EU Member States at that time, later joined by Croatia (2007), Albania, the former Yugoslav Republic of Macedonia (2009), and Bosnia Herzegovina (2012).

The overall objectives of the Programme are as follows:

- giving citizens the opportunity to interact and participate in constructing a more-closely knit Europe, open to the world, united in and enriched through its cultural diversity;
- developing a sense of European identity among European citizens based on recognised common values, history and culture;
- fostering a sense of ownership of the EU among its citizens;

1 See Council 2004. For the full report of the external evaluation of the community action programme to promote active European Citizenship see Commission 2007.
3 See EP/Council 2006. Two years later, the decision was slightly amended by Decision 1358/2008/EC of the European Parliament and of the Council (see EP/Council 2008).
• strengthening tolerance and mutual understanding between European citizens, respecting and promoting cultural and linguistic diversity while contributing to intercultural dialogue.

More specifically, the Programme aims to:
• bring together people from local communities across Europe to share and exchange experiences, opinions and values, to learn from history and to build for the future;
• fostering action, debate and reflection related to European citizenship and democracy through cooperation between civil society organisations at European level;
• making the idea of Europe more tangible for its citizens by promoting and celebrating Europe’s values and achievements, while preserving the memory of its past;
• encouraging interaction between citizens and civil society organisations from all participating countries, contributing to intercultural dialogue and bringing to the fore both Europe’s diversity and unity, with particular attention to activities aimed at developing closer ties between citizens from Member States of the EU as constituted on 30 April 2004 and those from Member States which have acceded since that date.4

In order to meet these objectives, four types of action have been implemented since the Programme was decided upon in 2006.5

**Action 1: “Active Citizens for Europe”**
This action is directed specifically at activities that aim to bring together people from local communities across Europe in order to share and exchange experiences, opinions and values, and to learn from history. It seeks to encourage meetings, exchange of ideas and debate among Europe’s citizens. This action is subdivided into two key measures:

I. “town twinning and networking of twinned towns”, designed to establish beneficial links at local level between twinned municipalities for fostering exchange and cooperation;

II. “citizens’ projects and support measures”, exploring innovative methods of citizens’ participation.

**Action 2: “Active Civil Society in Europe”**
This action is targeted at civil society, supporting civil society organisations and think-tanks as links between European citizens and the EU. Civil society organisations at European, national, regional and local levels are acknowledged as important elements of citizens’ active participation in society and as helping to invigorate all aspects of public life. European public policy research institutions, for their part, are seen as having a specific role in providing ideas and reflections on European issues, active citizenship or on European values. In order to provide civil society organisations and think tanks (policy institutes) with the necessary capacity and stability for extending and structuring their activities at a European level, structural support is given to those organisations in the form of operating grants covering a part of their running costs (key measures I and II: “structural support for think-tanks” and “structural support for civil society organisations at a European level”). With a view to enhancing the dynamism of civil society in Europe, support is also provided to concrete cooperation projects of civil-society organisations from different participating countries established at local, regional, national or European level (key measure III: “support to projects initiated by civil society organisations”). Those projects are expected to

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5 For a detailed description of the programme, including submission and selection procedures, see the Programme Guide (EACEA 2011).
raise awareness on the issues of common interest and on the concrete solutions that can be found through cooperation or coordination at a European level.

**Action 3: “Together for Europe”**

This action aims at deepening the concept of “active European citizenship” and at promoting its understanding throughout Europe, thus contributing to “bringing Europe closer to its citizens”. More concretely, this action line supports:

I. high-visibility events such as commemorations of historical events, artistic events, awards to highlight major accomplishments and Europe-wide conferences, which should increase Europeans’ sense of belonging to the same community, make them aware of the history, achievements and values of the EU, involve them in intercultural dialogue, and contribute to the development of their European identity;

II. studies promoting a better understanding of active citizenship at European level;

III. information and dissemination tools.

**Action 4: “Active European Remembrance”**

This action is aimed to promote and preserve active European remembrance, specifically by sponsoring projects designed to preserve former concentration camps as well as the main sites and archives associated with mass deportations, and to commemorate the victims of mass exterminations and mass deportations that took place during National Socialism and Bolshevism. This is based on the assumption that in order to fully appreciate the meaning of fundamental European (Union) principles such as freedom, democracy and respect for human rights, it is indispensable to remember the breaches of those principles caused by twentieth-century totalitarianism. Only by raising awareness of Europe’s violent past and the Second World War in particular, citizens could meaningfully engage in a reflection on the origins of the EU, the history of European integration as a civilising project preserving peace among its members, and finally on today’s Europe, thereby moving beyond the past and building the future.

The [overall financial envelope](#) for the implementation of the Programme for the period 2007 to 2013 was set at EUR 215 million, with the breakdown between the different actions defined as follows:

- Action 1 – Active Citizens for Europe: at least 45%,
- Action 2 – Active Civil Society in Europe: approximately 31%,
- Action 3 – Together for Europe: approximately 10%,
- Action 4 – Active European Remembrance: approximately 4% of the global budget.

The remaining 10% of the appropriations were reserved to cover the Programme’s general, administrative and technical expenses.

As far as management issues are concerned, it is the European Commission that is answerable for the strategic running of the Programme. However, it is the Brussels-based **Education, Audiovisual and Culture Executive Agency (EACEA)** that has been mainly responsible for its actual implementation under supervision from its parent Directorate-General for Communication (DG COMM). The EU Member States and other participating countries have a consultative role through the “Programme Committee”, while the “Europe for Citizens Points” (ECPs) have been established in the majority of participating countries to ensure targeted grassroots dissemination of information on the Programme, including how to develop a project, prepare funding applications and build international partnerships.

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6 Within the annual budgets, the budgetary authority allocated supplementary funds in 2009 (EUR 3 million) and 2010 (EUR 1.775 million), thus increasing the total budget of the programme to EUR 219.775 million (as of 2010).
During **2010**, a mid-term evaluation of the Europe for Citizens programme 2007-2013 was carried out by the Commission with the support of external experts. The evaluation confirmed the relevance of the Programme, especially in terms of achieving its overarching aim of “giving citizens the opportunity to interact and participate in constructing an ever closer Europe, thus developing citizenship of the European Union”. Moreover, it suggested a clear added value of the Programme in terms of scale and scope of activities undertaken by organisations supported by the Programme, and provided evidence that the operational objectives of the Programme implementation, as well as beneficiaries’ expectations of the Programme, had been met. In terms of overall programme efficiency, the evaluation highlighted the continuing strong demand for the Programme, with the available budget clearly not matching the number of actual applications and a considerable level of unmet demand for certain actions and measures such as Active European Remembrance. Another shortcoming was stated with regard to the dissemination of results, where a number of barriers were identified, including lack of specific funding for communications, the cost of advertising and translations, the need for specialist staff, and a relative lack of interest from national media.

Based on the assessment of past achievements and deficiencies, a series of recommendations were made for the remainder of the Programme and the preparation of a possible successor programme. They can be summarised under four headings:

1) **Achieving stronger understanding and ownership of the EU** by strengthening links between the Programme, highlighting major societal issues and issues identified by citizens as being of direct and current interest, and by identifying ways to uphold EU major strategic goals and political priorities (e.g., the 2020 Strategy);

2) **Further improving and adjusting the programme implementation**, among other things by finding a better balance between supporting major stakeholders and small-scale participants, increasing the level of funding for the Active European Remembrance and Active Civil Society Actions, and facilitating the application process.

3) **Achieving more balanced participation** by making an effort both to counterbalance existing geographical discrepancies, manifest in a distinct underrepresentation of countries from Northern (UK, Netherlands, Denmark and Sweden) as well as Southern Europe and the Balkans (Spain, Portugal, Greece, Romania, Bulgaria, Slovenia, Albania, Croatia and FYR Macedonia), and increase the involvement of “hard-to-reach” groups, including disabled persons.

4) **Increasing the policy and media impact of activities supported by the Programme**, notably by exploiting the links between local government capacity building and town twinning activities supported by the Programme, by exploring the possibility of organising events, press meetings etc., that bring together policy-makers, thematic experts and organisations benefiting from the Programme, and by forging stronger links with other EU programmes and initiatives such as the Fundamental Rights and Citizenship programme, Youth in Action, or Culture.

Above all, the mid-term evaluation suggested the need for strengthening the policy impact of a future successor Programme, which was to be more closely linked to key topics on the EU agenda and exploit synergies with other EU policies.

Such a successor programme was presented by the European Commission in December 2011 (COM(2011) 884 final), just a few months after the publication of the evaluation report.

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7 For the full evaluation report, see Ecorys 2010. For the official report on the mid-term evaluation provided for the Council, the EP, the EESC and CoR on 1 March 2011, see Commission 2011a.
2. THE COMMISSION’S PROPOSAL FOR A NEW EUROPE FOR CITIZENS PROGRAMME (2014-2020)

Preceded not only by the above-mentioned mid-term evaluation of the current Europe for Citizens programme 2007-2013, but among other things also a number of consultation meetings with stakeholders (see below), the “Proposal for a Council Regulation establishing for the period 2014-2020 the programme ‘Europe for Citizens’” was officially adopted by the European Commission on 14 December 2011.

The Commission’s proposal, which basically advocates a continuation of the current programme though in a modified form, is divided into:

I. an introductory Explanatory Memorandum (pp. 2-7),

II. the draft of the (Council) Regulation as such (pp. 8-16), accompanied by

III. an annex (pp. 17-22) as well as an obligatory “Legislative Financial Statement (pp. 23-44).

ad I) Explanatory Memorandum:

Based on the premise that “encouraging and facilitating citizens’ wider involvement in the European Union and what it stands for” was a key priority for contemporary (EU-)Europe, “strengthening remembrance and enhancing capacity for civic participation at the Union level” is defined as the principle objective of the proposed Europe for Citizens programme 2014-2020. This general objective is broken down into two specific ones, namely:

a) Stimulate debate, reflection and cooperation on remembrance, Union integration and history;

b) Develop citizens’ understanding and capacity to participate in the EU policy making process and develop opportunities for solidarity, societal engagement and volunteering at EU level.

The memorandum emphasises the wish and need to streamline the new Programme more consistently with other EU policies and objectives. To this aim, a stronger link of the activities foreseen for the next generation of the Europe for Citizens programme with concrete policy making is envisaged, to be achieved by a strong cooperation between Commission services implementing respective policies and objectives.

As regards consultation processes with stakeholders, the memorandum describes them as “substantial” and refers not only to two consultation meetings held in Brussels, but also an open public online consultation launched by means of the Commission’s IPM (Interactive Policy Making) in October 2010 and open until January 2011, inviting contributions from all interested parties. In addition, three focus group surveys held in May and June 2011 on different aspects of the Programme are explicitly mentioned, as is the obligatory Impact Assessment carried out in the summer of 2011, which in turn is

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9 See Commission 2011b.
10 Ibid., p. 2f.
11 Ibid., p. 5.
described as having been guided by the mid-term evaluation of the current programme (see above).

Considering the legal elements of the proposal, the memorandum stresses the link with the existing Programme not only with regard to aims and objectives, but also concerning its implementation 1) through operating grants and action grants as well as service contracts, and 2) by means of an existing executive agency. The legal basis for the proposal is suggested to be Article 352 TFEU (Treaty on the Functioning of the European Union), while compliance with both the subsidiarity and proportionality principle is argued.

In terms of budgetary implications, EUR 229 million are foreseen by the Commission to be allocated for the Europe for Citizens programme within the new – and still to be negotiated – Multiannual Financial Framework for the period 2014-2020. In this context, increased cost-effectiveness is envisaged for the new Programme’s implementation, especially by streamlining management structures and further reducing administrative burdens.

ad II) Draft Regulation:

The draft regulation as such is quite brief, containing 16 articles and a complementary annex. While Art. 1 and 2 specify the duration of the proposed Europe for Citizens programme from 1 January 2014 to 31 December 2020 and repeat the general and specific objectives as presented in the explanatory memorandum, Art. 3 elaborates on the structure and supported actions of the Programme. Two main programmatic strands are envisaged:

a) Remembrance and European Citizenship

b) Democratic Engagement and Civic Participation

Under these two strands, which are complemented by horizontal activities for analysis, dissemination and exploitation of the project results (“Valorisation”), a series of different actions are suggested to be financed by the Programme. These include, among others, citizens’ meetings and town twinning, support for organisations of a “general European interest”, debates/studies and interventions on defining moments in European history, reflections/debates on common values, and initiatives to raise awareness of the EU institutions and their functioning.

With grants and public procurement contracts constituting the measures used in the Programme (Art. 4), participation (Art. 5) is declared open to:

- EU Member States,
- acceding countries, candidate countries and potential candidates on the basis of specific regulations, and
- the EFTA (European Free Trade Association) countries party to the EEA (European Economic Area) Agreement, that is Iceland, Liechtenstein and Norway.

Access to the Programme (Art. 6) is declared open to “all stakeholders promoting European integration”, including local authorities and organisations, educational and research institutions, and citizens’ groups. Cooperation with international organisations in the field (Art. 7), such as UNESCO, is mentioned as a possibility.

As regards the implementation of the Programme (Art. 8), the adoption of annual work programmes by the Commission is foreseen, setting out not only the objectives pursued, the expected results, the method of implementation and the total amount of the financing
plan, but also containing a description of the actions to be financed as well as an indication of the amount allocated to each action and an implementation timetable. In its work, the Commission shall be assisted by a committee (Art. 9) within the meaning of Regulation 182/2011.13 In addition, regular contacts with beneficiaries of the Programme and relevant stakeholders are planned (Art. 10), and the coherence with other Union instruments is guaranteed by the Commission (Art. 11).

Concerning the projected overall budget (Art. 12), a financial envelope of **EUR 229 million** – as mentioned already in the preceding memorandum – is indicated for the implementation of the Programme, with resources allocated to communication actions explicitly mentioned to contribute to covering the corporate communication of the political priorities of the EU (Art. 12 Par. 2). Means to protect the EU’s financial interests are listed under Art. 13.

In terms of monitoring and evaluation (Art. 14), regular evaluation of the Programme by independent external bodies is guaranteed. In addition, the Commission commits itself to provide an interim evaluation report by December 2017, a communication on the continuation of the Programme no later than December 2018, and an ex-post evaluation report no later than 1 July 2023.

The concluding two articles of the legislative proposal govern the transition from the current to the new Europe for Citizens programme (Art. 15) and stipulate the regulation’s entering into force (Art. 16).

**ad III) Annex and Legislative Financial Statement:**

The annex accompanying the Commission’s legislative proposal – even though no explicit reference is made neither in the memorandum nor the draft regulation – contains complementary information on:

1) the initiatives planned for the two main strands of the Programme (“Remembrance and European Citizenship” and “Democratic Engagement and Civic Participation”) as well as the horizontal actions (“Valorisation”),

2) programme management,

3) monitoring issues, and

4) controls and audits.

Of particular interest are the explanatory remarks on monitoring (pp. 18-20), specifying indicators against which progress of the Programme and achievement of the specific objectives presented in the memorandum and Art. 2 of the draft regulation in particular will be measured. These include, among others, number of projects and quality of results (both an increase of projects by 80% and an increase of the average score given by external evaluators is envisaged for objective 1), number of directly involved participants (a minimum of 600 000 persons per year with a balanced participation of men and women is set as a target for objective 2), and percentage of first time applicants (a minimum of 15% across the board for both objectives).

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The **legislative financial statement** essentially recapitulates the framework of the legislative proposal (title, objectives and grounds for the proposal, duration, etc.) and sheds further light on envisaged management measures (monitoring rules, control system, measures to prevent fraud and irregularities), before turning to a detailed analysis of the proposal’s estimated financial impact. It is only here that a clear **breakdown of the overall budget** for the Programme is offered. Of the suggested total envelope of EUR 229 million under Heading 3 “Security and Citizenship” of the Multiannual Financial Framework, **EUR 206 million** are registered as **operational appropriations** and thus made available for the projects and actions to be financed by the Programme, with the annual commitments increasing from EUR 27.8 million in 2014 to EUR 31.6 million in 2020. The remaining EUR 23 million – slightly more than 10% of the overall budget – are reserved for “appropriations of an administrative nature”. To those add EUR 10.423 million set aside in Heading 5 of the Multiannual Financial Framework (“Administration”), hence raising the **global administrative expenditures** planned for the Europe for Citizens programme 2014-2020 to **EUR 33.423 million**. This makes a ratio of 1 to 6.2 when comparing administrative and operational appropriations.

Within the operational appropriations, the total of EUR 206 million is unevenly distributed between the three main lines of action. While **EUR 42.60 million (20.68%)** are attributed to **Action No. 1** (“Raise awareness on remembrance, Union history, identity and aim by stimulating debate, reflection and networking”), **EUR 139.45 million (67.69%)** are earmarked for **Action No. 2** (“Encourage democratic and civic participation of citizens at Union level, by developing citizens’ understanding of the Union policy-making process and promoting opportunities for social engagement and volunteering at Union level”). The remaining **EUR 23.95 million (11.63%)** are budgeted for **Action No. 3** (“Analysis, dissemination and valorisation of project results”). More specifically, the three lines of action are subdivided as follows:

**Action No. 1: Remembrance and European Citizenship**

<table>
<thead>
<tr>
<th>Products/Services to be Supplied</th>
<th>Commitment in EUR million</th>
<th>In % of Total for Respective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Partnerships (3 years)</td>
<td>Operational grants</td>
<td>9.450</td>
</tr>
<tr>
<td>Structural support (1 year)</td>
<td>Operational grants</td>
<td>5.000</td>
</tr>
<tr>
<td>Remembrance projects</td>
<td>Action grants</td>
<td>20.600</td>
</tr>
<tr>
<td>EU history, identity and aim projects</td>
<td>Action grants</td>
<td>7.550</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>42.600</strong></td>
</tr>
</tbody>
</table>

**Action No. 2: Democratic Engagement and Civic Participation**

<table>
<thead>
<tr>
<th>Products/Services to be Supplied</th>
<th>Commitment in EUR million</th>
<th>In % of Total for Respective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Citizens’ meetings</td>
<td>Action grants</td>
<td>21.000</td>
</tr>
<tr>
<td>Networks town twinning</td>
<td>Action grants</td>
<td>41.900</td>
</tr>
<tr>
<td>Citizens’ and civil society organisations’ projects</td>
<td>Action grants</td>
<td>28.000</td>
</tr>
<tr>
<td>Partnerships (3 years)</td>
<td>Operational grants</td>
<td>32.550</td>
</tr>
<tr>
<td>Structural support (1 year)</td>
<td>Operational grants</td>
<td>16.000</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>139.450</strong></td>
</tr>
</tbody>
</table>
## Action No. 3: Valorisation

<table>
<thead>
<tr>
<th>Products/Services to be Supplied</th>
<th>Commitment in EUR million</th>
<th>In % of Total for Respective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Peer review</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Action grants/public procurement</td>
<td>7.000</td>
<td>29.23</td>
</tr>
<tr>
<td><strong>Studies and communication services</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public procurement</td>
<td>4.000</td>
<td>16.70</td>
</tr>
<tr>
<td><strong>Support measures</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Action grants</td>
<td>3.150</td>
<td>13.15</td>
</tr>
<tr>
<td><strong>Presidency events</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Action grants</td>
<td>3.500</td>
<td>14.61</td>
</tr>
<tr>
<td><strong>Support structures in the Member States</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operational grants</td>
<td>6.300</td>
<td>26.30</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>23.950</strong></td>
<td><strong>100.00</strong></td>
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</tbody>
</table>
3. RECEPTION OF THE PROPOSAL BY EESC, COR AND COUNCIL, AND LEGISLATIVE INVOLVEMENT OF THE EP

In the following section, the reception of the Commission’s proposal for a renewed Europe for Citizens programme 2014-2020 by the European Economic and Social Committee (EESC), the Committee of the Regions (CoR) and the Council are highlighted, before legal aspects of the EP’s legislative involvement will be taken into closer consideration.

3.1. The Opinion of the EESC

The EESC adopted its formal opinion on the Commission’s Proposal (rapporteur: Andris Gobiņš) at its 482nd plenary session on 11 July 2012 by 140 votes to 1 with 5 abstentions (SOC/458 – EESC/2012/1583).

Overall, the Opinion is strongly favourable towards a continuation of the Europe for Citizens programme and largely endorses the European Commission’s proposal, but at the same time calls for a stronger involvement of the EP, the EESC, the CoR and the partners in the structured dialogue to be more involved in framing, monitoring and evaluating the Programme designed for enhancing active citizenship in Europe.

Besides the lack of involvement of other EU institutions, the EESC finds particular fault with the budget proposed for the Programme, which is presented as unsatisfactory. The challenging economic framework with its detrimental effects both on government and EU budgets is though acknowledged by the EESC, but at the same time the suggested funding for the Programme is criticised as “entirely insufficient” and inadequate “to achieve tangible results at the European level”. The present level of funding would even “raise issues regarding the importance given to public involvement in decision-making and of decision-makers’ ability to honour their commitments to implement the Lisbon Treaty” (Art. 3.4). The EESC thus calls for allocating additional resources to Europe for Citizens, yet without providing detailed information as regards amounts and sources.

Other issues of concern include anxiety that the Programme may divest the Commission’s various directorates-general of their responsibility to encourage public participation, dialogue and partnerships in their areas of responsibility by using their own financial and other resources, and that the annual work programmes foreseen in the legislative proposal may weaken the Programme’s focus on long-term issues or even obscure them completely.

In addition to these more general reservations, the EESC makes a number of more specific recommendations for the Europe for Citizens proposal. Among them are the following:

- Grants supporting structural change, participation and the use of institutional memory ought to be given priority;
- The Programme’s main selection criteria should be based on the European dimension and public involvement in EU-related issues rather than on implementation at a European level. In this regard, also an option to allocate grants for national-level participation in the EU decision-making process is suggested;
- Representatives of the EESC, the CoR and the partners in the structured dialogue ought to be included in the Programme’s steering group;

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14 See EESC 2012. The Opinion of the EESC was influenced and given direction also by a public hearing on the issue (3 May 2012), followed by a series of study group meetings.
Policy Department B: Structural and Cohesion Policies

- Project management should be simplified, especially the evaluation arrangements, while retaining the necessary control;
- Voluntary work is suggested to be recognised as eligible in terms of co-financing;
- Special support or a separate category should be provided for small-scale projects in Member States where the work of civil society organisations in areas relevant to the Programme's objectives is particularly disadvantaged or in which participation is low;
- Broader involvement of citizens rather than officials of institutions is envisaged. In cases of a public administration or any body mainly funded by public money proposing a project, partnership with at least one civil society organisation should be compulsory;
- East-West cooperation in particular should be encouraged in the form of either town-twinning or other projects;
- With planned administrative expenditures being declared “excessive” (Art. 3.14), stricter cost-benefit analysis and increased efforts to curtail administrative costs is requested.

3.2. The Opinion of the CoR

Unlike the EESC, the CoR took its stance not in a distinct document, but in a collective Opinion on “EU Financial Instruments in Justice and Citizenship”, encompassing not only the Europe for Citizens proposal (COM(2011) 884 final), but also the legislative proposals for a Rights and Citizenship Programme (COM(2011) 758 final) and a Justice Programme (COM(2011) 759 final). The Opinion (CoR 13/2012; rapporteur: Giuseppe Varacalli) was adopted by the CoR’s 96th plenary session on 18 July 2012, following a stakeholder consultation in Brussels on 13 March 2012 and an unanimous vote in the responsible Commission for Citizenship, Governance, Institutional & External Affairs (CIVEX) on 27 April 2012.

In a synoptic manner, the three proposals concerned are examined. Their overall importance as crucial instruments for supporting the implementation of EU policies in the fields of justice, rights and citizenship is affirmed, as is their compliance with the principle of subsidiarity, the observation of which is a key task and concern of the CoR. At the same time, however, the Opinion calls on the Commission and the Member States to actively involve local and regional authorities in implementing the three programmes, particularly in developing the annual work programmes.

Unlike the EESC, the CoR considers the financial envelope proposed by the European Commission “sufficient” for an “effective implementation” both of Europe for Citizens and the other two programmes, justifying this position by noting that “this envelope has been maintained in line with that granted to the programmes currently in force for the same areas of action and that, inter alia, provision has been expressly made for upward revision in the event of accession of a new Member State” (Art. 4).

More specifically on Europe for Citizens, the CoR cherishes the hope that the new Programme might also promote the new “citizens’ initiative” enabling EU citizens to make legislative proposals to the Commission on issues in which the Union is competent (Art. 7), and that the emphasis given to partnerships in support of EU-level civil society might further democracy, good governance and the rule of law in third countries, too (Art. 21).

15 See CoR 2012.
The Opinion welcomes the “more flexible structure” of the new proposal vis-à-vis the current one (Art. 40), while stressing the “extremely valuable exchanges of experiences between communities in different geographical areas” through the existing town-twinning scheme (Art. 15). Accordingly, it calls “for a good part of the overall budget of the [new] Europe for Citizens programme to be allocated to activities that take place in the context of town twinning” (Art. 42).

Suggestions for concrete amendments to the Commission’s proposal are nevertheless limited to one, namely that a specific sentence be added to Art. 9 (1) stating that “One representative of the Committee of the Regions may be involved in the advisory procedure” (Recommendations for Amendments, p. 11).

3.3. Positioning of the Council

The proposal for a renewed Europe for Citizens, which had been formally transmitted to both the Council and the EP on 14 December 2011, was dealt with in the Council meeting on Education, Youth, Culture and Sport in Brussels on 10 and 11 May 2012 (3164th meeting), where a “partial general approach” could be reached. The meeting was preceded by and built upon an examination of the original legislative proposal in the Council’s preparatory bodies. The results of this preparatory work, lasting from January to April, together with the suggestions for changes to the Commission’s proposal are summarised in the corresponding Report of the Permanent Representatives Committee, dated 4 May 2012 (9095/1/12).

On the whole, the Report welcomes the Commission proposal, in particular regarding the balance achieved of simplification of the programme structure on the one hand, whilst on the other hand providing more detailed information both on the initiatives that could be supported under each of the three main strands (remembrance, civic participation and valorisation) and the management as well as monitoring of the Programme, including indicators against which progress can be measured. Nonetheless, a number of changes to the original proposal are suggested, which can be summarised as follows:

1) **Funded activities** (Art. 3 (2)): The activities to be funded under the Programme ought to be re-organised according to the type of the activities rather than thematically, with increased attention given to the national contact points as the principal advice and information structures that implement the Programme;

2) **Access to the Programme** (Article 6): Access to the Programme should become broader, including also regional authorities and organisations as well as cultural and youth organisations.

3) **Implementing provisions** (Articles 8 and 9): While agreeing to the advisory procedure put forward by the Commission, the report requests “appropriate involvement of the Member States during the implementation” (p. 3). To this aim, a new article on communication according to which the Commission will provide ex-post information to Member States on selection decisions (Art. 13a) is proposed, as is an indicative budgetary breakdown between the three strands in the Regulation itself (Annex, Sections I and II): around 20% for the remembrance strand, 60% for democratic engagement, 10% for valorisation, and 10% for management.

4) **Indicators**: Though the need for indicators to measure the impact of the Programme is acknowledged, their structure is suggested to be simplified, while qualitative indicators are proposed to be added and the description of indicators be made more precise.

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16 Press release of 10 May 2012 (see Council 2012a).
17 See Council 2012b.
Moreover, particular attention is given to the geographical indicator, which ought to be revised in order to show clearly how many submitted and selected projects are coming from a given country.

As for the budget projected in the Commission’s proposal, the Report of the Council’s Permanent Representatives Committee calls to mind that the Multiannual Financial Framework has not yet been finalised, and that the financial envelope can hence not yet be agreed upon. At the same time, however, there is no indication of a categorical reservation from the Council’s part against the overall amount of EUR 229 million suggested by the Commission.

3.4. Choice of Legal Basis and Involvement of the EP

Without providing further explanation and justification, the Commission’s Proposal declares Article 352 TFEU (Treaty on the Functioning of the European Union)\(^{18}\) as the sole legal basis for the envisaged Regulation on a new Europe for Citizens programme. The choice of said Article 352 that provides for a special legislative procedure, namely the consent procedure, and thus ascribes the leading role to the Council while giving the EP only the choice of accepting or rejecting, but not amending the Council’s position,\(^{19}\) caused some amazement on the part of the Parliament’s responsible Committee on Culture and Education (CULT). This was in particular due to the fact that the current Europe for Citizens programme (2007-2013), which is very similar in content, had been given a double legal basis (ex Art. 308 and 151 TEC) and had been adopted under the former codecision procedure (now “ordinary legislative procedure”).

Given the CULT Committee’s reluctance to accept the proposed legal basis, the opinion of the EP’s Legal Service was sought on the issue. In its opinion, the Legal Service reiterated the European Court of Justice’s position that Union measures should be based on a sole legal basis wherever possible and that recourse to a dual legal basis ought to be made only exceptionally, if an act “simultaneously pursues a number of objectives or has several components that are indissociably linked, without one being secondary and indirect in relation to the other”.\(^{20}\) Nevertheless, the Legal Service came to the conclusion that such a dual legal basis was appropriate in the actual case, since the Europe for Citizens Proposal was based on two objectives of equal importance covered by different articles of the TFEU: while the objective connected to “remembrance”\(^{21}\) referred to the competences the Union enjoyed under Article 167 TFEU, relating to improvement of knowledge and dissemination of history of European peoples, the other objective connected to “civic participation”\(^{22}\), relating to EU citizenship per se and awareness-raising of this concept, had to be dealt with under Article 352 TFEU.\(^{23}\) The EP’s Committee on Legal Affairs (JURI), whose opinion had also been requested,\(^{24}\) shared the view of the legal service that since

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\(^{18}\) See TFEU 2010.

\(^{19}\) Art. 352 (1) TFEU states that “If action by the Union should prove necessary, within the framework of the policies defined in the Treaties, to attain one of the objectives set out in the Treaties, and the Treaties have not provided the necessary powers, the Council, acting unanimously on a proposal from the Commission and after obtaining the consent of the European Parliament, shall adopt the appropriate measures”.

\(^{20}\) Case C-411/06 Commission v Parliament and Council, paragraph 47 (Court of Justice 2009). See also Case C-211/01 Commission v Council (Court of Justice 2003), paragraph 40, and Case C-178/03 Commission v Parliament and Council (Court of Justice 2006), paragraph 43.

\(^{21}\) See first part of the general objective under Art. 1 of the Commission’s Proposal, the first specific objective under Art. 2, and the first strand under Art. 3(1), as well as the Annex of the Proposal.

\(^{22}\) See the second part of the general objective under Art. 1, the second specific objective under Art. 2, and the second strand under Article 3(1).

\(^{23}\) The Legal Service presented its view in the meeting of the CULT Coordinators on 27 March 2012. See EP 2012b, Point 12.

\(^{24}\) See the minutes of the CULT meeting of 29 February 2012. See EP 2012a, Point 16.
neither Art. 167 nor Art. 352 TFEU exclusively covered both of the Proposal’s objectives, recourse to a double legal basis involving both of them was indispensable.25

The Parliament’s view, however, that both of the strands of objectives pursued by the legislative proposal were of equal importance and that there was no evident subordination of one to the other was contested by both the Commission and the Council. Rather, the latter presented the objective of “Remembrance and European Citizenship” as incidental to that of “Democratic engagement and civic participation” and argued that a double legal base could hence not be used.26 These obvious differences of opinion as regards the appropriate legal basis for the new Programme could not be reconciled in a special meeting with the responsible Commissioner, Mrs Viviane Reding, in May 2012 either.

Despite such hardened fronts and an imminent procedural deadlock,27 the EP refrained from the ultimate option provided by the consent procedure of rejecting the Proposal wholesale. Instead, it was decided within the CULT Committee to proceed with the deliberations of the legislative proposal as in the case of an ordinary legislative procedure, to prepare a formal report, and make recommendations for modifications and amendments. Depending on the Council’s readiness to comply with the EP’s wishes expressed in such a “virtual codecision procedure” and incorporate them into the final draft of the regulation, the Parliament reserved its right to eventually approve or discard the entire proposal.

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26 Commission and Council notably challenged the EP’s stance in a common meeting organised in April 2012 by the EP’s designated rapporteur on this dossier, Mr Hannu Takkula, with an aim to reconcile the diverging opinions.
27 See also the minutes of the CULT meeting of 29 May 2012: EP 2012d, Point 10.
4. EVALUATION OF THE PROPOSED PROGRAMME

Following a) the review of the current Europe for Citizens programme and its coming into being, b) the presentation of the key elements of the successor programme 2014-2020 proposed by the European Commission, and c) a summary of the legislative proposal’s reception by EESC, CoR and Council, a critical analysis of the proposal will be undertaken in order to assess potential strengths and shortcomings. In so doing, focus of attention will be on the following issues:

1) underlying concept of “citizenship”
2) programme design
3) programme management and usability
4) budget

4.1. Underlying Concept of “Citizenship”

Citizenship is a political concept dating back to the ancient world which essentially describes the relation of an individual to a body politic and as such carries with it both rights and responsibilities. As any other socio-political terminology, citizenship defies any clear-cut definition since it is subject to changing political, social, economic and cultural circumstances, manifest in the concept having varied considerably throughout history and within societies over time.28

The contemporary concept of European Citizenship widely discussed in the media and among politicians alike poses particular problems. This is since citizenship has traditionally been bound and subordinate to a clearly defined political entity, in the modern age notably the nation state with its ideal of a population united by unmistakable cultural traits and especially a common language. Thus, it is not surprising that European (Union) Citizenship – a distinct concept first introduced by the Maastricht Treaty 1992 and later extended by the Treaty of Amsterdam – has remained a loose concept basically defined through national citizienships and merely complementing them. Accordingly, Art. 20 TFEU (ex Article 17 of the Treaty establishing the European Community) states that “Citizenship of the Union is hereby established. Every person holding the nationality of a Member State shall be a citizen of the Union. Citizenship of the Union shall be additional to and not replace national citizenship.”29

The elusiveness of the concept of (European) citizenship with the problem of clearly defining its constituent traits and thus also the role assigned to the individual citizen is reflected both in the current and the proposed new Europe for Citizens programme. What becomes clear in any case is the basic conception of citizenship the Commission aims to follow, namely a civic-republican one as opposed to a competing liberal-individualist conception.30 While the latter is essentially concerned that an individual’s status may be undermined by governments and evolves around needs and entitlements necessary for human dignity, stressing man’s economic nature and the idea that citizenship is based on reason for the pursuit of enlightened self-interest, the civic-republican conception of citizenship emphasizes man’s political nature, and sees citizenship as an active process. The fundamental idea is that (democratic) citizenship needs to be founded on a culture of

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28 For a history of the multilayered concept of “Citizenship” see, e.g., Heater 2004.
29 TFEU 2010. A similar definition can be found in Title II, Art. 9 of the Treaty on European Union (TEU 2010): “Every national of a Member State shall be a citizen of the Union. Citizenship of the Union shall be additional to and not replace national citizenship.”
participation, allowing people to practice citizenship and providing places to do so. This is seen as a means not only to channel frustrations, but also to bring people together to discuss matters of common concern and create a sense of belonging and unity.

The Europe for Citizens Proposal seeks to encourage such a culture of participation, most evidently in the case of the second strand of the Programme, Democratic Engagement and Civic Participation, but also as regards strand number one, Remembrance and European Citizenship. An undertaking of this kind is certainly to be welcomed, since it aims to advance a community spirit beyond national frontiers; a spirit, which seems all the more indispensable at a time of political and economical uncertainty where fosses of national(istic) rivalries and distrust long considered closed in Europe open up again, proving the idea of a consolidated supranational identity among the continent’s peoples to be a chimera. Yet it must remain open whether the programme proposal in its existing form is indeed best suited to “reinforce European Citizenship”, the Commission’s strategic objective targeted by the proposal,\(^{31}\) in the way it is hoped for, and whether capacities for civic participation can be effectively built “as one element of a strategic triangle, in addition to delivering on citizens’ needs and to promoting citizens’ rights”.\(^{32}\)

What gives reason for some doubt is especially the one-dimensional and overly instrumental idea of what active citizenship and citizens’ involvement might mean on a European level. This is manifest in the tailoring of the entire Europe for Citizens programme towards EU policies and especially the policy-making process. While knowledge of and active participation in EU policy making is certainly an important issue to be addressed by and fostered in an encompassing citizenship programme, it is certainly not the only one, and perhaps not even the one with best added value.

To suppose that acquaintance with the EU’s political system and its “legislative machinery” was the characteristic feature of citizenship and civic participation illustrates some ignorance towards the multitude of forms “active citizenship” can take. Moreover, it also shows a degree of pretentiousness inasmuch as vivid self-interest of the European Institutions in increasing their and the Union’s legitimacy by making political decision making more “public” – no matter how legitimate this interest might be – is imposed upon European citizens by the means of a Programme accordingly tailored. Thereby the EU exposes itself all too easily to possible criticism claiming that after all, Europe for Citizens was not meant to promote a culture of active citizenship which in democratic systems necessarily has to be “critical” and heterogeneous, but designed as a means for the self-staging of the EU institutions and an instrument for their own legitimisation.

The emphasis laid on a narrowly defined concept of civic participation and citizenship, serving primarily an instrumental purpose, is also reflected in the lopsided programme design.

**4.2. Programme Design**

In the proposed draft regulation for Europe for Citizens, the Programme’s two main thematic strands – Remembrance and European Citizenship on the one hand, Democratic Engagement and Civic Participation on the other – appear on an equal footing, and there is no evident privileging of one over the other.

\(^{31}\) See Point 1.4.1. of the Legislative Financial Statement accompanying the proposal (Commission 2011b, p. 23).

\(^{32}\) Ibid. (Explanatory Memorandum), p. 2.
However, the budget breakdown provided in the Legislative Financial Statement accompanying the legislative proposal reveals distinct **imbalances**, which are corroborated by the Council (see above). While only around 20% of the overall operational appropriations of EUR 206 million (EUR 42.60 million) are budgeted for the Remembrance strand, more than two thirds (EUR 139.45 million) are reserved for strand number two. Against this background it becomes clearer why in the context of the aforementioned divergences of opinion on the proposal’s appropriate legal basis, Commission and Council were able to reasonably stress the subordinate role of Remembrance to Civic Participation. In the proposal’s present form, it looks indeed as if the Remembrance part is mainly conceived as an addition to – not to say fig-leaf of – the second part, which is financially far better off.

This seems short-sighted, since it can be argued that reconstructing and working on legacies common to Europeans and collective histories of both suffering and success may no less contribute to the genesis of a European civic culture than actions directly aiming to encourage civic participation at EU level. With this in mind, a **more balanced distribution of financial resources** between the two strands of the Programme would appear desirable and appropriate, also considering that in the current Programme the level of unmet demand for action line 4 (“Active European Remembrance”) is particularly high. Yet not only is a budgetary shift to be taken into consideration. The **thematic focus** in the two strands, too, seems worthy of being critically examined, which goes in particular for the Remembrance part.

Currently, **strand one** focuses predominantly on the causes of totalitarian regimes in Europe’s modern history and their victims. Essentially, this amounts to **National Socialism** and **Bolshevism**, even though this is not declared to be an exclusive condition for projects to get funded. The tragic and singular role of these “political religions” in human history and their crucial importance for European integration after the Second World War is without doubt. Consequently, an ample role and representation of these historical experiences in any effort to come to terms with the European past is essential.

It is nevertheless dubious whether reducing European remembrance to these two regimes is desirable, and whether common European values should be defined first and foremost vis-à-vis and a counterpart to past experiences of mass violence, genocide, or population displacement. In so doing, one is at risk to fall into an over simplistic “black-and-white” **scheme**, which turns the history of European integration and the EU quasi automatically into the obverse of Europe’s “dark past”. Such simplification fosters an uncritical and one-dimensional historical understanding, which is detrimental to the creation of a critical (in the best sense of the word) European public and does not do justice to the unmistakable achievements of the European integration process since the late 1940s either. Not by idealising this process, but only by allowing for open discussion also on the history of the EU and challenging widespread **topoi** of an “ever closer Union” and “perpetuated success story”, can fruitful debate on further development and improvements be effectively fostered.

The present focus on 20th-century National Socialism and Bolshevism is problematic in yet another respect, since it makes European history a matter of the post-First-World-War period. Historical complexity is hence unduly reduced, obscuring the view on broader (inter-)relations essential for the understanding of contemporary Europe. The problem of radical nationalism with all ensuing consequences (wars fought and crimes committed in the name of the nation, colonialism, etc.), for example, can be argued to be less a child of the 20th century but the late 18th and the 19th century.
Accordingly, the range of projects to be supported under the Remembrance strand of Europe for Citizens should be widened both regarding subject matter and timeframe. The Annex to the legislative proposal already indicates in passing that “The strand should also encompass activities concerning other reference points in recent European history”. This possibility, however, would need to be far more strongly accentuated in the Programme. The reservation indicated in the Impact Assessment Report against a more comprehensive approach that widening the strand “beyond Nazism/Stalinism” might result in a “‘nationalisation’ of the issues addressed”\(^{33}\) is elusive, since the same risk of “nationalisation” applies equally – if not even more – to National Socialism and Bolshevism as to any other historical experience. Similarly, it would be good if additional information could be provided by the Commission on the budgetary sub-item “EU history, identity and aim”, namely concerning which concrete projects are actually planned to be sponsored thereunder, and especially addressing possibilities of supporting initiatives that go beyond the recapitulation of mainstream “official” versions of EU history.

Overall, the design of the second strand of the Programme appears more balanced than the first, providing support for a series of different established instruments encouraging civic participation. Nevertheless, it is not outlined in detail the extent to which the suggested instruments are suitable to reach the formulated objectives, and which respective added value one particular action might have vis-à-vis others. Further elucidation would hence seem desirable.

In general, the programme design of the new legislative proposal proves some critical reflection of its originators on the mid-term evaluation of the current Europe for Citizens programme. Even closer consideration of the evaluation results in the programme proposal would be preferable all the same. For example, while the advice of more closely linking the new programme to key topics on the EU agenda and exploiting synergies with other EU policies has already been taken well on board – perhaps even in too one-sided a manner (see above), there seems still to be some potential to strengthen links to major societal issues and issues identified by citizens as being of direct and current interest, which are not necessarily corresponding to the EU’s major strategic goals and political priorities. Similarly, the proposal in its current form does not yet make sufficiently clear how more balanced participation than in the current programme could be guaranteed, which is one of the main recommendations of the mid-term evaluation. This leads us to an examination of the programme management structures foreseen in the legislative proposal and its usability.

### 4.3. Programme Management and Usability

In management terms, the new Proposal stresses the aim of “a more streamlined and simplified approach”,\(^{34}\) resulting both in increased efficiency and cost-effectiveness. In this regard, reference is made to achievements made even in the current programme, where the Education, Audiovisual and Culture Executive Agency (EACEA) responsible for the management of Europe for Citizens has successfully implemented a series of simplification measures. These measures have been aimed to reduce administrative burdens and costs, and comparatively beneficial management structures can indeed be stated. This is manifest, e.g., in that the administrative workload within Europe for Citizens now is considerably higher than the average of other programmes managed by EACEA such as

\(^{33}\) Commission 2011c, p. 29.

\(^{34}\) Commission 2011b (Explanatory Memorandum), p. 7.
LLP, Media, and Youth in Action, with 358 projects per person versus 137 on average for the entire Agency, and 57 contracts per person versus 27.\footnote{Ms Amaya Pérez de Albéniz and Ms Anna Cozzoli from EACEA kindly provided the detailed information and figures on the management of the current Europe for Citizens programme.}

Accordingly, even though propositions for additional improvements going beyond those already achieved are lacking in the legislative proposal, a promising basis for the management of the future programme on an EU level seems in place. With no more than 10 permanent posts budgeted for the entire programme administration in EACEA (to which add 8.5 posts planned within the Commission for the supervision of actions managed by EACEA), it is also not to be expected that decentralisation of management structures in favour of the national level enjoying a large degree of autonomy would lead to effective cost savings, nor would such decentralisation necessarily imply qualitative progress.

While the arrangements made for a smooth programme management thus seem adequate, it is less clear whether the \textit{usability} of the Programme already reaches a satisfactory level. It is without doubt that some progress has been made in the current programme as to the \textit{application process}, the facilitation of which had been one of the demands of the mid-term evaluation. This progress is related to the above-mentioned simplifications that benefit both the management bodies and the beneficiaries, including:

\begin{itemize}
  \item simplification of eligibility criteria;
  \item setting up of eForms for the application procedure, with one simplified form (7 pages instead of originally 14) in electronic format for all actions;
  \item establishment of a flat-rate system easily understandable for and accessible to applicants;
  \item systematic adoption of grant decision (as opposed to grant agreement), allowing beneficiaries to start their respective actions immediately upon reception of the decision.
\end{itemize}

At the same time, however, no satisfactory solutions are evident in the proposal for Europe for Citizens 2014-2020 regarding two other challenges raised in the mid-term evaluation: 1) finding a better balance between supporting major stakeholders and small-scale participants, 2) achieving more balanced participation in terms of geographical discrepancies and involvement of “hard-to-reach” groups. Both issues are touched upon more or less explicitly in the legislative proposal, but no concrete remedies are suggested. Consequently, defined medium-term targets such as “minimum 600 000 persons per year [directly involved] with a balanced participation between women and men” remain first and foremost declarations of intent, with no sufficient indication on how to implement them.

Effectively encouraging individuals to apply for and take part in Europe for Citizens, however, and assuring a geographically balanced participation is central if the Programme intends to come up to its claim of being truly European and designed for its citizens. In the current Programme, as criticised in the evaluation report, there is a clear overrepresentation of big institutional applicants and beneficiaries. While such larger stakeholders should certainly not be edged out, more incentives and possibilities for individual citizens to get involved need to be given. In this context, it is especially \textit{small-scale programmes} and \textit{grass-root initiatives} which should be encouraged and given higher priority in the legislative proposal. One possibility to guarantee adequate representation of smaller bottom-up initiatives would be to \textit{earmark a certain percentage of funds} in each strand for them.
For obvious reasons, such measures would need to be accompanied by a corresponding **communication strategy** that raises public awareness for the Programme as a whole and for the opportunities given to non-institutional applicants and small-scale initiatives in particular. Communication – perhaps in combination with a specifically reserved fixed quota of funds – appears also to be a crucial tool for fostering the active participation of social groups which are not adequately represented in the current Programme. Similarly, it is central to promote Europe for Citizens in those parts of Europe where demand for the Programme is comparatively low so far.

Given the key importance of communication not only for advertising Europe for Citizens and disseminating project results, but also counteracting existing imbalances in participation, it seems essential not to allow the **budget planned for communication** – forming part of Horizontal Action (“Valorisation”), the Programme’s third strand, without being clearly indicated – to be diluted for other purposes. In its present form, the Commission’s Proposal states under Art. 12 (2) that: “The resources allocated to communication actions under this Regulation shall also contribute to covering the corporate communication of the political priorities of the European Union, as far as they are related to the general objectives of this Regulation.”36 The very same provision is kept in the Council’s version of the Draft Regulation. Allowing for financial resources to be used for the Commission’s general communication policy, however, provides a carte blanche and seems detrimental to the purpose and functioning of the Europe for Citizens Proposal. This applies particularly in view of the limited overall budget available for the Programme.

**4.4. Budget**

At first sight and in total figures, the **budget of EUR 239.423 million** proposed for the renewed Europe for Citizens programme – **EUR 206 million** of which are operational appropriations – appears considerable. Yet this amount is largely put into perspective when compared to other ongoing programmes of the EU and especially the overall amount of the next Multiannual Financial Framework 2014 to 2020. Taking the EUR 1,025 billion in commitments into considerations, which have been suggested by the European Commission for 2014-2020, Europe for Citizens makes only for around **0.02%**. To put it another, slightly pointed way: only one of 4281 Euros planned to be spent at the EU level is budgeted for the one Programme which puts European Citizens at its very heart.

It is true that Europe for Citizens might be the most specifically tailored, but certainly not the only programme that seeks to encourage civic participation and make a contribution to European remembrance and identity in one way or another, and that the above figures are hence only of limited significance. Nevertheless, the financial envelope for Europe for Citizens 2014-2020 appears **insufficient**, taking into account the ambitious objectives which are to be achieved by the Programme. The budget does not come close to the symbolic “**one Euro per citizen**”, or a total of **EUR 495 million**, which had been requested among others by the Council of European Municipalities and Regions (CEMR) – the largest organisation of local and regional governments in Europe – in the final declaration adopted at the European Congress on Citizenship and Twinning held from 29 September to 1 October 2011 in Rybnik, Poland.37 Actually, the budget does not even match the financial envelope of the current Europe for Citizens programme (EUR 219.775

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36 See also the Annex to the Draft Regulation, where it is stressed under point 2 that “The budget allocated shall also cover corporate communication on the political priorities of the Union” (Commission 2011b, p. 18).
37 See CEMR 2011.
million, including EUR 4.775 million allocated as supplementary funds in 2009 and 2010 to the original EUR 215 million), if the amount is inflation-adjusted.\footnote{The Impact Assessment accompanying the legislative proposal misleadingly talks about “a reduction compared to the current instrument” (Commission 2011c, p. 34), but this is under the assumption of a global budget for Europe for Citizens 2014-2020 of no more than EUR 203 million.}

Against this background, a **considerable increase of the financial envelope**, as requested also in the Opinion of the EESC, would seem commendable and consistent with the results of the mid-term evaluation. Even the current Programme envelope falls short of matching the demand of applicants, and the ratio between failed and successful applications is likely to increase significantly in the future, not least given the ambition to actively popularise the Europe for Citizens programme. Without further resources made available for the implementation of the Programme, it is not quite evident either how all the medium-term targets mentioned in the legislative proposal, aiming for qualitative improvements and an increase of supported projects at the same time, could be realistically achieved.

As for the distribution of the budget to the individual strands of the Programme, setting an **indicative breakdown** as suggested by the Council seems reasonable. In line with the critical remarks made above (see Section 4.2.), however, **strengthening Strand one (Remembrance) vis-à-vis Strand two (Civic Participation)** would seem essential in order to reach a more balanced Programme Design. To this aim, a share of at least 30 to 50% rather than the present 20 to 60% in the Council’s draft Regulation (as of total budget, the remaining 20% equally distributed to Strand three – “Valorisation”, and the administration of the Programme) should be considered.
5. RECOMMENDATIONS AND CONCLUSIONS

In view of the above observations, policy makers might take the following recommendations into account when giving the final shape to a possible Europe for Citizens programme 2014-2020:

1) Acknowledgement of the overall importance of a renewed Programme:
In retrospect, initiatives for "Active European Citizenship" can look back to a successful history, their establishment being closely related with increasing desires of the EU to foster the Union's legitimacy and transparency, contribute to the creation of "European identity" and give incentives for transnational forms of civic participation. Especially the current Europe for Citizens programme (2007-2013) has proved a success ascertained also in the mid-term evaluation of 2010, which stresses the Programme's beneficial contribution to raise awareness for and contribute to a European public sphere; something that seems no less important now than in the past, given recent tendencies for a comeback of national and other antagonism in Europe. On these grounds and considering that Europe for Citizens is currently the only programme devoted exclusively to promoting civic participation and active remembrance on a European level, continuing the Programme in one form or another seems highly recommended. Consequently, pros and cons of a wholesale rejection of the legislative proposal for Europe for Citizens 2014-2020 would have to be most carefully weighed, even in the case of the Council refusing to take the EP's possible suggestions for amending the draft Regulation into due consideration and insisting on the suggested consent procedure.39

2) Widening of the underlying concept of "citizenship":
Following a civic-republican conception of citizenship, the Europe for Citizens Proposal is based on the idea of citizenship as an active process and hence puts the case for a culture of participation. While this basic thrust of the Programme is to be welcomed, widening the understanding of citizenship seems necessary. As yet, an essentially instrumental idea of what citizenship signifies and is to be directed to is prevalent, focusing predominantly on EU policies and the policy making process. More closely linking a future Europe for Citizens programme to the EU's major strategic goals and thus strengthening the policy impact is legitimate and has been advocated also in the current Programme's mid-term evaluation report. Nevertheless, imposing a one-sided and essentialist understanding of citizenship is unwise, since such an understanding is negligent of the many forms civic participation and public spirit can beneficially take. Allowing for a broader idea in the final proposal of what "citizenship" stands for should not least be in the distinct self-interest of the European Institutions, namely in order to avoid the Programme being branded by critics as a mere means for self-advertising the EU.

3) Correction of existing imbalances in the programme design:
The formulation of the draft regulation does not indicate any preference for any one of the two main thematic strands of the proposed Programme over the other. Yet the respective budgetary allocations unveil an unmistakable dominance of Democratic Engagement and Civic Participation (approximately 68% of the operational budget) towards Remembrance and European Citizenship (approximately 21%), partly reflecting also the instrumental understanding of citizenship underlying the legislative proposal. In order to remedy this

39 That does not imply, though, that the EP's arguments for a changed legal basis might not be justified. Apart from all juridical reasoning, the EP's insistence on applying the ordinary legislative procedure is understandable from a more fundamental point of view: it might appear grotesque that the EP as the only directly elected and legitimised body of the EU is given only a subordinate role just in the case of a programme, which puts citizenship and the involvement of citizens at a European level at its very heart.
imbalance and avoid the impression of the first Strand being a mere addition to the second, a more equal distribution of funds would be required. Such a shift would also underpin the EP’s argument for the application of a dual legal basis with regard to the legislative proposal and the replacement of the suggested consent procedure by an ordinary legislative procedure. In addition, the present programme design asks for adaptations of the thematic focus, especially within Strand one (Remembrance). To avoid an all too schematic and one-dimensional view of Europe’s past, the almost exclusive concentration on National Socialism and Bolshevism, which is currently discernible, should be widened. Expanding both subject matter and timeframe would allow for a more comprehensive and indeed more sensible understanding not only of European history and its complexities, but also the European integration process.

4) More consistent consideration of the mid-term evaluation results:
Even though the mid-term evaluation has left its marks in the new legislative proposal, a more conscious consideration of the suggestions made in the former would be desirable. This goes in particular for strengthening links to major societal issues perceived by citizens as being of direct interest to them, by which means increased public interest into the initiatives supported by Europe for Citizens could be generated. In the same vain, it should be made clearer by which concrete means a more balanced participation – one of the shortcomings of the current Programme – could be ensured. In this context, the suggestion of the Council to add indicators for geographical balance to the draft regulation seems a reasonable step in the right direction.

5) Maintenance of centralised management structures while strengthening ECPs:
An analysis of the financial resources planned by the Commission reveals that the actual administrative expenditures will be higher than 10% of the overall financial envelope. That is if also those means not directly budgeted within the Programme, especially human resources for the programme management (budgeted under heading 5 of the Multiannual Financial Framework), are taken into consideration. While further efforts should be made to reduce the administrative costs, it seems nevertheless an overstatement to call the foreseen administrative costs “excessive”, as the Opinion of the CoR does. In comparison to other programmes administered by an executive agency under the Commission’s supervision, the current Europe for Citizens programme can refer to pretty efficient management structures.

A more decentralised management of the Programme at the level of the Member States would be a possibility. It is not to be expected, however, that this would lead to any savings, nor is it evident that this would result in any qualitative improvements. Potential risks of a decentralised administrative structure include the problem of preserving uniform standards for the evaluation of project proposals and their later assessment, and the risk of a fragmentation of the Programme’s intellectual thrust along national interest lines (e.g., particular national interests favouring projects that are devoted to specific forms of historical remembrance).

What seems more promising than a decentralisation of the programme management is upgrading the “Europe for Citizens Points” (ECPs), as it has been suggested by the Council. Such would strengthen the anchoring of Europe for Citizens in the individual member states and contribute to the Programme’s general renown and accessibility at the same time. In this context, involving external stakeholders such as representatives of the EESC and CoR in the Programme Committee might also be a worthwhile idea.
6) Increase of the Programme’s usability:
Efforts have been made even in the current Europe for Citizens programme to enhance and facilitate participation, notably by streamlining the application procedures and award process. However, a further increase of the future Programme’s usability especially for individual citizens ought to be envisaged. To this aim, clear incentives for small-scale participants and bottom-up initiatives should be given, and a certain percentage of funds could be reserved for such non-institutional initiatives. In addition, increased attention needs to be paid to the more active involvement of “hard-to-reach” groups, which is a declared objective with as yet no corresponding strategy to reach it.

7) Stronger emphasis on communication and targeted use of the related budget:
An adequate communication strategy is to be seen as a key tool not only to raise awareness for Europe for Citizens, but also to enhance more balanced participation in the Programme and have a means to popularise project results. Accordingly, the role of communication should be emphasised even more decidedly in the Regulation.

To avoid any dissipation and potential misappropriation of the funds foreseen for communication actions, the use of these funds for the Commission’s general communication policy – currently an option that is explicitly mentioned – should be unmistakably excluded.

8) Increase of financial envelope:
Perhaps the most eminent deficiency of the legislative proposal in its present form, and at the same time probably the one point over which opinions are most likely to be diverging from the Council, concerns the financial envelope. Currently, the budget for 2014-2020 not only lacks any ambition, but even falls short of Europe for Citizens 2007-2013, which seems contradictory both to the effusive rhetoric used in the new proposal and the comprehensive objectives formulated therein. Pushing for an increase of the financial envelope to a symbolic “one Euro per citizen” would be desirable, but might seem overly ambitious giving the difficult situation of the Member States’ budgets and the pending difficult negotiations on the next Multiannual Financial Framework. Nevertheless, a considerable increase of the overall financial envelope for Europe for Citizens should be sought in any case. Such an increase seems all the more justifiable if the key role the Programme assumes in Europe’s “civic education” and the bonding of the EU with its citizens is put in relation to the size of Europe for Citizens, which is negligible to other programmes and the EU budget in general. Other than increasing the overall budget, indicative breakdowns per thematic Strand should be included into the Regulation, in line with the suggestions made for a more balanced programme design.

In summary, it can be stated that the proposal for a Europe for Citizens programme for the period 2014-2020 is a most valuable initiative. Creating and preserving “community” is a fundamental and persisting challenge for any political regime, as is the guarantee of a vivid culture of participation for any democratic system. Both tasks are set also – and in particular – for a (EU-)Europe that faces a widening gap between political institutions and the political class on the one hand, and its citizens on the other. To assist closing this gap is the key purpose of the Europe for Citizens proposal, which deserves credit both for its general thrust of fostering active remembrance and citizenship on a European level, and its basic structure containing two thematic strands.

Nevertheless, there are a number of potential flaws and deficits that have been stated, including those in this note, which deserve adequate consideration in the ensuing deliberations on the legislative proposal between the EP and Council. None of the points
raised, however, seems particularly difficult or even impossible to find agreement on, provided there is a corresponding political will. This goes also for the proposal’s legal status presently only providing for a consent procedure, and the question of the financial envelope, both of which are predestined to be controversial. It remains thus to be hoped that a final Regulation might be adopted in 2013, allowing for a smooth transition from the current to the new Europe for Citizens programme at the beginning of 2014 and providing planning certainty for applicants.
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