socialplatform

Brussels, April 2, 2012

Re: Social Platform's recommended amendments on the general regulation on the common provisions on structural funds

Dear Member of the European Parliament,

By next July, you will adopt in the REGI Committee the report on the general regulation on the common provision on structural funds.

Social Platform is the largest civil society alliance fighting for social justice and participatory democracy in Europe. Consisting of 45 pan-European networks of NGOs, We campaign to ensure that EU policies are developed in partnership with the people they affect, respecting fundamental rights, promoting solidarity and improving lives.

We call on you to take into consideration the following proposals for amendment in the committee report. You can find a list of our proposed amendments in annex to this letter.

Our main focus in the proposal goes to the following four key issues:

1. **Remove the macro-economic conditionality from all structural funds**
2. **Thematic priorities of the EU structural funds: Use in a more strategic way EU money to achieve the social targets of the Europe 2020 strategy**
3. **Separate the allocations to the ESF from the one to the food aid programme**
4. **Include civil society organisations as full partners in the preparation, implementation, monitoring and evaluation of the programmes (Partnership Contract)**

We trust that you will give these issues your utmost attention and include our amendments in your report.

Yours sincerely,

Conny Reuter
President

Pierre Baussand
Director

1) Remove the macro-economic conditionality from all structural funds

The European Parliament should oppose the application of macroeconomic conditionality – such as requirements related to excessive deficits, macroeconomic imbalances - to the structural funds.

Negative social impact of austerity measures will be further exacerbated by the suspension of payments and commitments from Cohesion Funds, particularly the Structural Funds. People in the EU under economic pressure should not be penalised for actions or situations beyond their control.

These Funds are the most important financial instrument for the social and economical development of the European Union. In many European regions they will represent the main source of public funding both at national, regional and local level.

a) ESF: Ensure support for people experiencing poverty: why the European Social Fund should be excluded from macroeconomic conditionality:

- **"Social inclusion and combating poverty" is one of the four thematic priorities of the ESF**

- **People worst affected by the crisis will suffer a double punishment:** reduction of their incomes through austerity measures and deprivation of financial support to combat poverty due to the fiscal conditionality. Member states under austerity measures are cutting wages, pension benefits, social security and social services. Not getting the support of the ESF will work against social cohesion and the achievement of the Europe 2020 poverty target

- **A concrete example of what can happen in 2014**: In Greece, as a result of the austerity measures and the wider recession, 5% of the population saw their 2010 incomes fall below the 2009 poverty line, swelling the ranks of those who were already – and remained – in poverty (another 20% of population)[1]. Yet despite the austerity measures adopted in the last two years, the public deficit is above the demands from the EU and the IMF (8,5% instead of 7,6). The potential suspension of ESF funds due to this situation will only make things worse for people in poverty.

b) ERDF: Ensure support to the most vulnerable groups to reduce their energy bills

Why:

- **The ERDF foresees that the most developed EU regions will have to dedicate at least 20% of their operational programmes to investment in supporting the shift towards a low-carbon economy in all sectors.** In particular investment should be made to support energy efficiency in the public buildings and housing sector. Energy efficiency will decrease the energy bill of those living in the refurbished houses.

[1] ETUI, Issue 5/2011, Inequality, poverty and the crisis in Greece

- **Between 50 million and 125 million people in Europe are estimated to be energy poor[2].** This number will inevitably increase in the future in line with rising energy prices and increased fuel bills.

- **Energy poverty disproportionately affects those on low household incomes –** retired people, those out of work or in poorly paid jobs, and those dependent on social security benefits. This general economic disadvantage is exacerbated by the poor energy efficiency standards of their homes; fuel-poor households are likely to occupy properties with inadequate thermal insulation and expensive and inefficient heating systems[3].

- Depriving a member states from investing in energy efficiency due to macroeconomic conditionality **will impact on the most vulnerable who cannot afford their increasing energy bills.**

c) Ensure accessibility of transport for most vulnerable groups and the mobility of workers: why Connecting Europe Facility for transport, energy and ICT should be removed from macroeconomic conditionality

- The thematic objective 7 of the general regulation is "promoting sustainable transport and removing bottlenecks in key network infrastructures"

- Concrete example: some of EU funds will be used for the renovation of the rail infrastructure in Poland. Why preventing the mobility of workers with blocking the allocation of funds? Why depriving people with disabilities from boarding on newly accessible train and not supporting the implementation of the UN Convention on the Rights of People with Disabilities?

2) Thematic priorities of the EU structural funds: Use in a more strategic way EU money to achieve the social targets of the Europe 2020 strategy

- **We support the priority n°9 on "promoting social inclusion and combating poverty"**

- **Use the EU funds to develop sustainable and <u>quality</u> employment**. Member states have committed to promote job quality In line with the Employment integrated guideline no. 8. According to these guidelines that the EU funds should support "member states that should step up social dialogue and tackle labour market segmentation with measures addressing precarious employment, underemployment and undeclared work. The quality of jobs and employment conditions should be addressed. Member States should combat in-work poverty and promote occupational health and safety. Adequate social security should also be ensured for those on fixed-term contracts and the self-employed"[4].

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2 Tackling Fuel Poverty in Europe, Recommendations Guide for Policy Makers, EPEE Consortium, page 4

3 Tackling Fuel Poverty in Europe, Recommendations Guide for Policy Makers, EPEE Consortium, page 4

4 Integrated guidelines for the economic and employment policies of the Member States, EUROPEAN COMMISSION, 2010

3) Separate the allocations to the ESF from the one to the food aid programme

- **Food aid programmes do not serve the same objective as "promoting social inclusion and combating poverty":** the latter aims at long term, trans-formative programmes that will enable people to lift themselves out of poverty and exclusion.

- **The current proposal of earmarking 20% of the ESF allocation** for the social inclusion and combating poverty priority is needed to support programmes to fight against poverty and social exclusion and to contribute to reach the poverty reduction target.

- **Therefore the Food Aid programme should be continued after 2013 within the structural funds with sound legal basis along with adequate funding found outside the European Social Fund.**

4) Include civil society organisations as full partners in the preparation, implementation, monitoring and evaluation of the programmes (Partership Contract)

- **We fully support the inclusion of non-governmental organisation in the article 5 dedicated to partnership, together with the social partners.** The European Parliament should ensure the inclusion of partnership in all the relevant articles of the regulation as proposed by Social Platform.

- **It should be made clearer that not only a territorial approach should be applied but also all groups of people facing discrimination, poverty and social exclusion** should be better targeted while preparing partnership contracts in a view of comprehensiveness for setting up the integrated approaches aiming at combating poverty and social exclusion.

Why?

- **Given their sound knowledge of the reality on the ground, the needs of different target groups,** on how to successfully run integrated projects funded by Structural Funds and the key role played by Structural Funds in delivering on the poverty reduction target, relevant stakeholders and especially social inclusion NGOs should clearly be seen as real partners and thus should run also be involved prior to the adoption of the European Code of conduct.

- **The implementation of Europe 2020 strategy requires it:** Recital 16 of the integrated guidelines requires the involvement of representatives of civil society. It states that the Europe 2020 strategy "should be implemented, monitored and evaluated (…) closely (…)with representatives of civil society, …

We trust that you will give these issues your utmost attention and include our amendments in your report.

Yours sincerely,

Conny Reuter
President

Pierre Baussand
Director

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Social Platform common position for amendments

Proposal for a regulation on the common provisions on structural funds

Adopted by the Steering Group on March 29, 2012

1) Remove the macro-economic conditionality from all structural funds

Amendment 1 – Article 21.5 – 21.8 « Conditionality linked to the coordination of Member States' economic policies »	
Text proposed by the Commission	**Text proposed by Social Platform**
5. Where the Member State fails to respond to the Commission's request referred to in paragraph 1 or does not reply satisfactorily within one month to the observations of the Commission referred to in paragraph 2, the Commission may, within three months following its observations, adopt a decision, by means of implementing acts, suspending part or all of the payments for the programmes concerned. 6. The Commission shall suspend, by means of implementing acts, part or all of the payments and commitments for the programmes concerned where: (a) the Council decides that the Member State does not comply with the specific measures set out by the Council in accordance with Article 136(1) of the Treaty; (b) the Council decides in accordance with Article 126(8) or Article 126(11) of the Treaty that the Member State concerned has not taken effective action to correct its excessive deficit; (c) the Council concludes in accordance with Article 8(3) of Regulation (EU) No […]/2011 [on the prevention and correction of macroeconomic imbalances] that, on two successive instances, the Member State has not submitted a sufficient corrective action plan or the Council adopts a decision declaring non-compliance in accordance with Article 10(4) of that Regulation; (d) the Commission concludes that the Member State has not taken measures to implement the adjustment programme referred to in Council Regulation (EU) No 407/2010 or Council Regulation (EC) No 332/2002 and as a consequence decides not to authorise the disbursement of the financial assistance granted to this Member State; or (e) the Board of Directors of the European stability mechanism concludes that the conditionality attached to an ESM financial	Delete paragraphs 5, 6 and 7

assistance in the form of an ESM loan to the concerned Member State was not met and as a consequence decides not to disburse the stability support granted to it. 7. When deciding to suspend part or all of the payments or commitments in accordance with paragraphs 5 and 6 respectively, the Commission shall ensure that the suspension is proportionate and effective, taking into account the economic and social circumstances of the Member State concerned, and respects equality of treatment between Member States, in particular with regard to the impact of the suspension on the economy of the Member State concerned. 8. The Commission shall without delay lift the suspension of payments and commitments where the Member State has proposed amendments to the Partnership Contract and the relevant programmes as requested by the Commission, which the Commission has approved and, where applicable: (a) the Council has decided that the Member State complies with the specific measures set out by the Council in accordance with Article 136(1) of the Treaty; (b) the excessive deficit procedure is held in abeyance in accordance with Article 9 of Regulation (EC) No 1467/97 or the Council has decided in accordance with Article 126(12) of the Treaty to abrogate the decision on the existence of an excessive deficit; (c) the Council has endorsed the corrective action plan submitted by the concerned Member State in accordance with Article 8(2) of Regulation (EU) No […] [EIP Regulation] or the excessive imbalance procedure is placed in a position of abeyance in accordance with Article 10(5) of that Regulation or the Council has closed the excessive imbalance procedure in accordance with Article 11 of that Regulation; (d) the Commission has concluded that the Member State has taken measures to implement the adjustment programme referred to in Council Regulation (EU) No 407/2010 or Council Regulation (EC) No 332/2002 and as a consequence has authorised the disbursement of the financial assistance granted to this Member State; or (e) the Board of Directors of the European stability mechanism has concluded that the conditionality attached to a financial assistance in the form of an ESM loan to the concerned Member State is met and as a consequence has decided to disburse the stability support granted to it. At the same time, the Council shall decide, on a proposal from the Commission, to re-budget the suspended commitments in accordance with	

Article 8 of Council Regulation (EU) No […] laying down the multiannual financial framework for the years 2014 to 2020.	

Justification for this proposal:

The disbursal or not of EU funds should not be linked to macroeconomic performance or failure to meet requirements related to excessive deficits, macroeconomic imbalances etc. The risk is that the negative social impact of austerity measures is further exacerbated by the suspension of payments and commitments from Cohesion Funds, particularly the Structural Funds. Participants or potential participants in structural fund projects should not be penalised for actions or situations beyond their control.

2) Use in a more strategic way Structural Funds to achieve the social targets of the Europe 2020 strategy

Amendment 2 – Article 9 "Thematic objectives"	
Text proposed by the Commission	**Text proposed by Social Platform**
Each CSF Fund shall support the following thematic objectives in accordance with its mission in order to contribute to the Union strategy for smart, sustainable and inclusive growth: 8) promoting employment and supporting labour mobility; 9) promoting social inclusion and combating poverty;	8) promoting ***quality*** employment and supporting labour mobility;

Justification for this proposal:

In line with guideline no. 8, member states have committed to promote job quality. In particular, member states should step up social dialogue and tackle labour market segmentation with measures addressing precarious employment, underemployment and undeclared work. The quality of jobs and employment conditions should be addressed. Member States should combat in-work poverty and promote occupational health and safety. Adequate social security should also be ensured for those on fixed-term contracts and the self- employed.

Amendment 3 – Article 24 "Content of programmes"

Text proposed by the Commission	Text proposed by Social Platform
5. Each programme, except those where technical assistance is undertaken under a specific programme, shall set out the indicative amount of support to be used for climate change objectives.	5. Each programme, except those where technical assistance is undertaken under a specific programme, shall set out the indicative amount of support to be used for climate change, ***social inclusion and poverty reduction*** objectives.

Justification for this proposal:
The aim being to make sure that Structural Funds will fully contribute to fully deliver on the Europe 2020 headline targets including the poverty reduction one, each programme should set out the indicative amount of supported devoted to deliver on the poverty reduction target, besides to climate change.

Amendment 4 – Article 44 "Implementation reports"	
Text proposed by the Commission	**Text proposed by Social Platform**
3. The annual implementation report submitted in 2017 shall set out and assess the information set out in paragraph 2 and progress towards achieving the objectives of the programme, including the contribution of the CSF Funds to changes in result indicators, when evidence is available from evaluations. It shall also assess the implementation of actions to take into account the principles set out in Articles 6, 7 and 8 and report on support used for climate change targets.	3. The annual implementation report submitted in 2017 shall set out and assess the information set out in paragraph 2 and progress towards achieving the objectives of the programme, including the contribution of the CSF Funds to changes in result indicators, when evidence is available from evaluations. It shall also assess the implementation of actions to take into account the principles set out in Articles 6, 7 and 8 and report on support used for climate change targets ***and actions taken to deliver on the poverty reduction target.***

Justification for this proposal:
Monitoring committees have a key role to play in verifying annually the actions taken at National and sub-national level through projects funded by Structural Funds to promote social inclusion and reduce poverty.

Amendment 5 – Article 46 "Progress report"

Text proposed by the Commission	Text proposed by Social Platform
2. The progress Report shall set out information and assess: (b) progress towards achievement of the Union strategy for smart, sustainable and inclusive growth, in particular in respect of the milestones set out for each programme in the performance framework and the support used for climate change objectives;	2. The progress Report shall set out information and assess: (b) progress towards achievement of the Union strategy for smart, sustainable and inclusive growth, in particular in respect of the milestones set out for each programme in the performance framework and the support used for climate change ***and poverty reduction*** objectives;

Justification for this proposal:
The progress report in the framework of the Partnership Contract will be a strategic reporting mechanism that should lead to monitoring the progress towards the achievement of the poverty reduction target. Member States will indeed have to detail in their Partnership contract their integrated approach to address the specific needs of geographical areas most affected by poverty or of target groups at highest risk of discrimination, poverty and social exclusion, with special regard to marginalised communities.

Amendment 6 – **Article 48 "(Ex ante evaluation"**	
Text proposed by the Commission	**Text proposed by Social Platform**
3. Ex ante evaluations shall appraise: … m) the adequacy of planned measures to promote sustainable development	Add new letter: ***n) the adequacy of planned measures to promote social inclusion and delivery on poverty reduction targets and to promote the accessibility of people with disabilities.***

Justification for this proposal:
Ex ante evaluations should evaluate the adequacy of planned measures to promote sustainable development, as well as to promote social inclusion and reduce poverty.

Amendment 7 – **Article 87.3 "Content and adoption of operational programmes under the Investment for growth and jobs goals"**	
Text proposed by the Commission	**Text proposed by Social Platform**
3. Each operational programme, except those where technical assistance is undertaken under a specific operational programme, shall include: …	3. Each operational programme, except those where technical assistance is undertaken under a specific operational programme, shall include: … ***(iv) a description of the specific actions taken to achieve the EU poverty reduction target by promoting the social inclusion of***

	disadvantaged groups of people and to reduce inequalities throughout the European Union.

Justification for this proposal:
Each Operational Programme should detail the kind of actions planned to reduce the poverty reduction target and to reduce inequalities.

Amendment 8 – Article 91 Major projects "Information to be submitted to the Commission"	
Text proposed by the Commission	**Text proposed by Social Platform**
1. The Member State or the managing authority shall submit the following information on major projects to the Commission as soon as preparatory work has been completed (f) an analysis of the environmental impact, taking into account climate change adaptation and mitigation needs, and disaster resilience;	1. The Member State or the managing authority shall submit the following information on major projects to the Commission as soon as preparatory work has been completed (f) an analysis of the environmental impact, taking into account climate change adaptation and mitigation needs, and disaster resilience ***and the social impact, taking into account the contribution to social inclusion.***

Justification for this proposal:
Currently major projects are really geared to develop hard infrastructures without paying attention to the environmental and social impacts. With regard to the EU 2020 headline targets and especially the social ones, the impact of major projects on social inclusion should be taken into account and assessed.

Amendment 9 – Article 100 "Functions of the monitoring committee"	
Text proposed by the Commission	**Text proposed by Social Platform**
1. The monitoring committee shall examine in particular: … f) actions to promote equality between men and women, equal opportunities, and non-discrimination, including accessibility for disabled persons;	1. The monitoring committee shall examine in particular: … f) actions to promote equality between men and women, equal opportunities, and non-discrimination, including accessibility for disabled persons; ***g) actions to fight poverty and promote social inclusion of disadvantaged groups of people***

Justification for this proposal:
If Operational Programs should include special actions for delivering on the poverty reduction target, it should be reflected in the functions of the Monitoring Committee.

Amendment 10 – Article 101.3 "Implementation reports for growth and jobs goal"	
Text proposed by the Commission	**Text proposed by Social Platform**
3. The annual implementation reports submitted in 2017 and 2019 shall set out and assess the information required under Articles 44(3) and (4) respectively, the information set out in paragraph 2, together with: e) the specific actions taken to promote equality between men and women and to prevent discrimination, including accessibility for disabled persons, and the arrangements implemented to ensure the integration of the gender perspective in the operational programme and operations; … i) progress in the implementation of measures to address the specific needs of geographical areas most affected by poverty or of target groups at highest risk of discrimination or exclusion, with special regard to marginalised communities including, where appropriate, the financial resources used;	3. The annual implementation reports submitted in 2017 and 2019 shall set out and assess the information required under Articles 44(3) and (4) respectively, the information set out in paragraph 2, together with: e) the specific actions taken to promote equality between men and women and to prevent discrimination, including accessibility for disabled persons, and the arrangements implemented to ensure the integration of the gender perspective in the operational programme and operations; ***as well as the specific actions taken to fight poverty and promote social inclusion of vulnerable groups of people.*** … i) progress in the implementation of measures to address the specific needs of geographical areas most affected by poverty or of target groups at highest risk of discrimination ***or poverty and social*** exclusion, with special regard to marginalised communities including, where appropriate, the financial resources used;

Justification for this proposal:
Given the proposals for amendments 14 and 16, Annual implementation reports should monitor as well the implementation of the specific actions taken to fight against poverty and social exclusion.

Amendment 11 – Article 111 "Modulation of the co-financing rates"	
Text proposed by the Commission	**Text proposed by Social Platform**
The co-financing rate from the Funds to a priority axis may be modulated to take account of: (1) the importance of the priority axis for the delivery of the Union strategy for smart, sustainable and inclusive growth, having regard to the specific gaps to be addressed; protection and improvement of the environment, principally through the application of the precautionary principle, the principle of preventive action and the polluter pays principle;	The co-financing rate from the Funds to a priority axis may be modulated to take account of: New (2) ***Reduction of poverty and promotion of social inclusion of vulnerable groups of people, especially through integrated active inclusion approaches.***

Justification for this proposal:
If Strategic Framework should be seen as a vehicle for delivering on the poverty reduction target, socially integrated approaches should be promoted through a higher co-financing rate.

Amendment 12 – Ex ante conditionalities, Thematic ex ante conditionalities Annex IV, 10.1 and 10.2	
Text proposed by the Commission	**Text proposed by Social Platform**
10.1 A national strategy for poverty reduction is in place that: – is in accordance with the national poverty and social exclusion target (as defined in the National Reform Programme), which includes the extension of employment opportunities for disadvantaged groups;	A national strategy for poverty reduction is in place that: ***– lays out concrete proposals designed to work towards the achievement of*** the national poverty and social exclusion target (as defined in the National Reform Programme ***and National Social Reports***), which includes the extension of ***quality*** employment opportunities for disadvantaged groups;
- demonstrates that social partners and relevant stakeholders are involved in the design of active inclusion	- demonstrates that social partners and relevant stakeholders are involved at ***all stages (design, implementation and evaluation) of the national anti-poverty strategies and all the*** active inclusion
A national Roma inclusion strategy is in place that: is coherent with the National Reform Programme;	A national Roma inclusion strategy is in place that: is coherent with the National Reform Programme ***and National Social Reports;***
10.2 A national or regional strategy for health is in place that: – Contains coordinated measures to improve access to quality health services;	A national or regional strategy for health is in place that: – Contains coordinated measures to improve access to quality ***and affordable*** health services ***aiming at tackling the social determinants of health inequalities;***

Justification for this proposal:
According to the analysis of 2011 NRPs carried out by one of our members, National Report Programs make very little case to the contribution of Structural Funds (ESF, ERDF) to the delivery on the social targets and especially the poverty reduction one. So, Member States should be asked to detail the contribution of Structural Funds to the achievement of the poverty reduction target in their National Social Reports which should underpin the NRPs. The aim is also to reinforce the value of the national anti-poverty strategies and broaden the scope where stakeholder engagement is required.

3) Separate the allocations to the ESF from the one to the food aid programme:

Amendment 13 – Article 84.3 "Resources for Investment for growth and jobs and for European territorial cooperation"

Text proposed by the Commission	Text proposed by Social Platform
3. At least 25 % of the Structural Funds resources for less developed regions, 40% for transition regions and 52% for more developed regions in each Member State shall be allocated to the ESF. For the purposes of this provision, the support to a Member State through the [Food for deprived people instrument] shall be considered as part of the share of Structural Funds allocated to the ESF.	3. At least 25 % of the Structural Funds resources for less developed regions, 40% for transition regions and 52% for more developed regions in each Member State shall be allocated to the ESF. For the purposes of this provision, the support to a Member State through the [Food for deprived people instrument] shall be considered as part of the share of Structural Funds ~~allocated to the ESF~~ **[Delete].**

Justification for this proposal:

The current proposal of earmarking 20% of the ESF allocation for the social inclusion and combating poverty priority is needed to support programmes to fight against poverty and social exclusion and to contribute to reach the poverty reduction target. Therefore the Food Aid programme should be continued after 2013 within the structural funds with sound legal basis along with adequate funding found outside the European Social Fund.

4) Include civil society organisations as full partners in the preparation, implementation, monitoring and evaluation of the programmes (Partership Contract)

Amendment 14 – Article 5 « Partnership and multi-level governance »	
Text proposed by the Commission	**Text proposed by Social Platform**
1. For the Partnership Contract and each programme respectively, a Member State shall organise a partnership with the following partners: (a) competent regional, local, urban and other public authorities; (b) economic and social partners; and (c) bodies representing civil society, including environmental partners, nongovernmental organisations, and bodies responsible for promoting equality and non-discrimination.	1. For the Partnership Contract and each programme respectively, a Member State shall organise a partnership with the following partners: (a) competent regional, local, urban and other public authorities; (b) economic and social partners; and (c) bodies representing civil society, including environmental partners, nongovernmental organisations, ***including non-for-profit organisations promoting social inclusion*** and bodies responsible for promoting equality and non-discrimination.
2. In accordance with the multi-level governance approach, the partners shall be involved by Member States in the preparation of Partnership Contracts and progress reports and in the preparation, implementation, monitoring and evaluation of programmes. The partners shall participate in the monitoring committees for programmes.	3. ***In cooperation with all relevant partners (trade-unions and civil society organisations at Union level),*** the Commission shall be empowered to adopt delegated acts in accordance with Article 140 to provide for a European code of conduct that lays down objectives and criteria to support the implementation of partnership and to facilitate the sharing of information, experience, results and good practices among Member States.
3. The Commission shall be empowered to adopt delegated acts in accordance with Article 140 to provide for a European code of conduct that lays down objectives and criteria to support the implementation of partnership and to facilitate	

the sharing of information, experience, results and good practices among Member States. 4. At least once a year, for each CSF Fund, the Commission shall consult the organisations which represent the partners at Union level on the implementation of support from the CSF Funds.	

Justification for this proposal:

Given their sound knowledge of: the reality on the ground, the needs of different target groups, how to successfully run integrated projects funded by Structural Funds and the key role played by Structural Funds in delivering on the poverty reduction target, relevant stakeholders and especially social inclusion NGOs should clearly be seen as real partners and thus should run also be involved prior to the adoption of the European Code of conduct.

Amendment 15 – Article 14 "Content of the Partnership Contract"	
Text proposed by the Commission	**Text proposed by Social Platform**
The Partnership Contract shall set out: … (c) an integrated approach to address the specific needs of geographical areas most affected by poverty or of target groups at highest risk of discrimination or exclusion, with special regard to marginalized communities, where appropriate, including the indicative financial allocation for the relevant CSF Funds; (d) (iv) the actions taken to involve the partners and their role in the preparation of the Partnership Contract and the progress report as defined in Article 46 of this Regulation; (e) (i) an assessment of whether there is a need to reinforce the administrative capacity of the authorities and, where appropriate, beneficiaries, and actions to be taken for this purpose;	(c) ***On the basis of Commission's guidelines***, an integrated approach to address the specific needs of geographical areas most affected by poverty or of target groups at highest risk of discrimination ***or poverty and social*** exclusion, with special regard to marginalized communities, where appropriate, including the indicative financial allocation for the relevant CSF Funds; ***aiming at contributing to the delivery of integrated national anti-poverty strategies detailed in the NRPs which promote the inclusion of all groups facing or at risk of poverty and social exclusion, underpinned by National Social Reports.*** (d) (iv) the actions taken to involve the partners, ***their effectiveness*** and the role ***of these partners*** in the preparation of the Partnership Contract and the progress report as defined in Article 46 of this Regulation; (e) (i) an assessment of whether there is a need to reinforce the administrative capacity of the authorities and~~, where appropriate,~~ beneficiaries, and actions to be taken for this purpose;

Justification for this proposal:

It should be made clearer that not only a territorial approach should be applied but also all groups of people facing discrimination, poverty and social exclusion should be better targeted while preparing partnership contracts in a view of comprehensiveness for setting up the integrated approaches aiming at combating poverty and social exclusion.

The integrated approach mentioned in this article should be used to underpin comprehensive national anti-poverty strategies so as to make sure that from the partnership contracts, clear commitments are made by Member States in the way they plan to concretize their engagement to reduce poverty and social exclusion taking into account the needs of specific groups at risk of poverty and social exclusion. Member States should be guided by Commission's guidelines in that regard to make sure that the approaches are coherent and homogeneous between themselves.

Amendment 16 – Article 23 "Preparation of programmes"	
Text proposed by the Commission	**Text proposed by Social Platform**
1. The CSF Funds shall be implemented through programmes in accordance with the Partnership Contract. Each programme shall cover the period from 1 January 2014 to 31 December 2020. 2. Programmes shall be drawn up by Member States or any authority designated by them, in cooperation with the partners. 3. Programmes shall be submitted by the Member States at the same time as the Partnership Contract, with the exception of European territorial cooperation programmes, which shall be submitted within six months of the approval of the Common Strategic Framework. All programmes shall be accompanied by the ex ante evaluation as set out in Article 48.	2. Programmes shall be drawn up by Member States or any authority designated by them, in cooperation with the partners ***referred to in article 5.*** ***Each Member State shall draw up and publish a consultation plan and subsequently report on the nature and outcomes of this consultation process.***

Justification for this proposal:
It is important to mention article 5 where partners to be included in the Partnership Contract are listed, to make sure that NGOs are involved in the preparation of programmes.

The partnership principle should not just lead to a formal exercise but should ensure an extensive, transparent process of consultation open to all relevant stakeholders including civil society organizations.

Amendment 17 – Article 42 "(Composition of the monitoring committee"	
Text proposed by the Commission	**Text proposed by Social Platform**
1. The monitoring committee shall be composed of representatives of the managing authority and intermediate bodies and of representatives of the partners. Each member of the monitoring committee shall have a voting right.	1. The monitoring committee shall be composed of representatives of the managing authority and intermediate bodies and of representatives of the partners ***referred to in article 5.*** Each member of the monitoring committee shall have a voting right.

Justification for this proposal:
It is important to mention article 5 where partners to be included in the Partnership Contract are listed, to make sure that NGOs are involved in the preparation of programmes.

Amendment 18 – **Article 46 "(Progress report"**	
Text proposed by the Commission	**Text proposed by Social Platform**
2.The progress Report shall set out information and assess: (h) the role of the partners referred in Article 5 in the implementation of the Partnership Contract.	(h) the role of the partners referred in Article 5 ***and an assessment of the quality and effectiveness of this partnership*** in the implementation of the Partnership Contract.

Justification for this proposal:
If the EU institutions want to give a real and full meaning to the partnership principle, Member States shall not only detail the role given to partners, but also assess how well the partnership principle will have been implemented.

Amendment 19 – **Article 51 "(Technical assistance at the initiative of the Commission"**	
Text proposed by the Commission	**Text proposed by Social Platform**
At the initiative of, or on behalf of the Commission, the CSF Funds may support the preparatory, monitoring, administrative and technical assistance, evaluation, audit and control measures necessary for implementing this Regulation. Those measures may include but not limited to: … (f) actions to disseminate information, support networking, carry out communication activities, raise awareness and promote cooperation and exchange of experience, including with third countries.	(f) actions to disseminate information, support networking, carry out communication activities, raise awareness and promote cooperation and exchange of experience***, particularly amongst non-governmental organisations,*** including with third countries.

Justification for this proposal:

Technical Assistance at the initiative of the Commission should be aimed at facilitating cooperation around the structural funds by non-governmental, civil society, social inclusion, environmental and anti-discrimination organizations at a European level, much more than what is currently the case.

Amendment 20 – Article 52 "Progress report"	
Text proposed by the Commission	**Text proposed by Social Platform**
1. At the initiative of a Member State, the CSF Funds may support actions for preparation, management, monitoring, evaluation, information and communication, networking, complaint resolution, and control and audit. The CSF Funds may be used by the Member State to support actions for the reduction of administrative burden for beneficiaries, including electronic data exchange systems, and actions to reinforce the capacity of Member State authorities and beneficiaries to administer and use the CSF Funds. These actions may concern preceding and subsequent programming periods. 2. The Fund-specific rules may add or exclude actions which may be financed by the technical assistance of each CSF Fund.	Add new paragraph 2: ***Each member state shall ensure in all OPs that sufficient technical assistance is made available to facilitate the involvement and participation of non-governmental organisations in the preparation, implementation, monitoring and evaluation of the funds.***

Justification for this proposal:

Despite its well-known success in helping NGOs to get involved in the Structural Funds' process, Technical Assistance money is not made available by Member States to these organizations. There is a big need to resource the participation of non-governmental, civil society, social inclusion and anti-discrimination organizations in the operation of the Structural Funds.

Amendment 21 – Article 113.7 – Management and control authorities - "Designation of authorities"	
Text proposed by the Commission	**Text proposed by Social Platform**
7. The Member State or the managing authority may entrust the management of part of an operational programme to an intermediate body by way of an agreement in writing between the intermediate body and the Member State or managing authority (a 'global grant').	7. The Member State or the managing authority may entrust the management of part of an operational programme to an intermediate body by way of an agreement in writing between the intermediate body and the Member State or managing authority (a 'global grant'), ***including local authorities, regional development bodies, or non-governmental organizations. With the view of facilitating access to Structural Funds for small NGOs, Member States shall promote the use of small and tailor-made global grants.***

Justification for this proposal:
Global grants are a powerful and well-proven financial tool that facilitate the good delivery on social inclusion outcomes through well-targeted projects engaging social inclusion NGOs that really meet the needs of vulnerable groups of people on the ground. The European Platform against Poverty

recognized that by calling for facilitating the access to Structural Funds for small NGOs through tailor-made schemes of global grants. But at this stage, this possibility is clearly lacking at national level.

Thus, there is a need to ensure global grants are used to ensure that the structural funds reach the most disadvantaged groups and that there is a minimum of one global grant in each member State.