



CONCORD POSITION ON THE DEAR CALL 2013

1. Intro

CONCORD welcomes the consultation by the European Commission on the DEAR Call of 2013. It is indeed a good and necessary practice to involve the sector in the design of the call to ensure its greatest possible impact through the projects supported. This increased impact will only be reached if the call draws on the long experience of the sector and evidence based research on the DEAR sector. To this end, CONCORD believes this cooperation on the Call should be taken further and the upcoming new CSO/LA programme should be developed in a cooperative/consultative and inclusive process.

2. Key Messages

- CONCORD insists that the thematic focus must be based on the right of initiative by CSOs.
- CONCORD insists that the selection criteria to determine impact must be based on the quality and the participative and pedagogical approach of projects rather than financial size and geographical reach.
- CONCORD calls for the removal of the minimum budget of 3 million euro per project.
- CONCORD requests that the requirement to cover 15 countries is removed and that all projects are assessed on their impact, either within target countries and sectors or their European wide impact.
- CONCORD believes that it is essential that **a second stakeholder cooperation meeting** is convened by the European Commission in the next week to finalise the call.

3. Thematic direction

The thematic link of the call is a cause of concern for CONCORD and its members. The right of initiative cannot be restricted by linking it to a particular policy document. Any thematic focus should therefore be set by the sector through a cooperative process. As this process has not taken place yet the priorities of policy coherence for development and MDG's which are foreseen in the Annual Action Plan 2013 should be kept.

Next to those priorities, the proposed link to the European Year of Development in 2015 is a good example of the right of initiative of civil society as the Year started as a civil society initiative. The alignment of the call with the European Year is welcomed by CONCORD and can lead to a strong role of Civil Society in making the European Year a success.

However, the proposed thematic priorities cannot be set before the EYD has been decided by the European Parliament and the Member States. Even more importantly, 2015 will be the year in which the new sustainable development framework will be discussed and the topics or themes of this discussion cannot, and should not, be pre-empted from Europe on a global process.

The DEAR call can only effectively support the European Year if the projects start on time and it is therefore imperative to strictly follow the indicative timeline for the evaluation of proposals and ensure that contracts are signed by Sept 2014 latest to allow for a proper inception and planning of 2015 activities.

4. Supporting the DEAR sector

CONCORD shares the view of the European Commission that the DEAR Call should support the DEAR sector to have greater impact. However, there is a great risk that the current proposal will decrease the impact of the supported projects and the sector as focus is shifted from quality of implementation to number of countries covered and the size of grants. This is a serious cause of concern to the CONCORD constituency. Several reactions have been already sent among which the reaction by the Fair Trade Advocacy Office and Trialog which CONCORD supports.

Impact for DEAR is on the results of DEAR as an approach, an approach that the European Commission has acknowledged in its staff working paper as the open-ended approach to learning. Next to the impact, there is increased attention to the visibility of the DEAR sector and the projects. While we agree that the visibility of DEAR activities can be improved, we should refrain from easy quick fix solutions and focus on solutions that increase visibility on longer term. The DEAR call is not intended to promote European Union development work but to support critical discussion and learning on global development.

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The following proposals risk decreasing the impact.

1. Bigger projects with a higher budget

A minimum budget of 3 million euro will make it impossible for the big majority of CSO's and LA's to apply and run the project. The organisational capacity for such a major project is not present in all countries and among all actors and this will lead to a lower participation of organisations of the EU12 as well as several EU15 countries. The call should instead facilitate their possibility to participate in this call through supporting smaller projects. Furthermore co-funding sums of €3 to 5 million is going to be difficult or even impossible for most DEAR actors.

This concern has been already underlined in the EC commissioned DEAR study: "one of the **shortcomings of the EC's approach** in support of DEAR: is grant **allocation**

conditions that appear to favour big CSOs over smaller organisations, leading to a perceived concentration of EC funds in the hands of relatively well-established organisations”

CONCORD therefore **calls for the removal of the minimum budget of 3 million.**

2. The requirement to cover 15 countries.

While for certain projects it is a clear aim to cover the whole of Europe, forcing all projects to cover 15 countries will lead to several projects who instead of targeting a certain sector or region have to work on a lowest common denominator. Also the funding spread over so many countries would mean it is fragmented and not effective.

This also means that more time, resources and money will be spent on administration rather than activities and mobilisation. Putting such a large administrative burden on participating organisations risks losing the actual impact and is unlikely to encourage local ownership.

Working across large number of countries will mean having to take multiple contexts into account, which for example formal education is almost impossible and could lead to only symbolic action in certain countries without real impact. Both targeted initiatives and European wide coordination activities need to exist together to ensure both real impact and the European connection of the targeted activities.

In the words of a CONCORD member working on formal education: “The educational systems are very diverse and the educational level of students is hardly comparable. One of the main lessons learned of the project that we have just finalised, is that schools want and need tailor-made educational packages and assistance. Even within 1 country it was challenging to use one and the same product. You need to be very aware of the context and the curriculum that they are using and accordingly adapt the educational package. Trying to do so in 15 countries would be very inefficient and time consuming and the end result would indeed be very superficial.”

CONCORD requests that **the requirement to cover 15 countries is removed** and that all projects are assessed on their impact, either within target countries and sectors or their European wide impact.

3. Sub-granting

Sub-granting can indeed provide an added value as a way of building capacity of smaller NGOs – but if sub-granting is foreseen to be in addition to a minimum of 15 different partners, this again limits the number of potential lead applicants to a few large organizations. For sub-granting to be efficient, substantial time and resources must be invested in building the capacity, including project and financial management of sub-grantees. In addition, the rules for the sub-granting are currently not very clearly specified and there is a higher risk of disallowances. It is important that the European

Commission provides clear guidance on the administrative procedures that the beneficiaries should follow.

Based on the extensive experience of the sector and the evidence base gathered in the DEAR study, CONCORD proposes the following changes:

- Possibility to apply for projects between 1.5 and 5 years to fit the support to the time needed to achieve certain results as not all processes last exactly 3 years.
- Possibility for small grants for innovative projects
- The establishment of a helpdesk for projects to assist with the project management and to allow the European Commission staff to focus on their core tasks.
- Reconsider the mechanism of co-financing.
At the moment the 25% is an obstacle for several NGOs especially coming from those countries facing crises and where there is not any other public funding on Development. To keep co-financing at that level means de facto to exclude those countries from the call and this means to accept that in such countries (such as Greece, Spain, Slovenia, Bulgaria, Cyprus) NGOs will be forced by the lack of funds to stop their activities on DEAR. This, in contexts where public dissatisfaction is moving the focus from global development to local interest, can dramatically increase the danger of raising extremisms that need DEAR activity as antidote towards a Europe of Democracy and Solidarity.

5. Conclusion

CONCORD welcomes the discussion process on the DEAR call and believes that a true cooperation process will lead to a greater impact of the projects supported and a greater visibility of the DEAR sector. CONCORD commits itself to be a constructive partner for the European Institutions on the development of the current call and the future CSO/LA instruments. For the current call, CONCORD believes that it is essential that a second stakeholder cooperation meeting is convened by the European Commission in the next week to finalise the call. This position will be sent by CONCORD to the member states and CONCORD will engage with them on ensuring that the call will support the DEAR sector and we can together ensure its impact.