



Plate forme européenne de la société civile pour l'éducation tout au long de la vie
European Civil Society Platform on Lifelong Learning - EUCIS-LLL

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CIVIL SOCIETY ORGANISATIONS IN DANGER IN THE DRAFT REGULATION “ERASMUS FOR ALL”!

“Erasmus for All” is the new programme for education, training, youth and sport proposed by the European Commission on 23 November 2011. The draft regulation is now being discussed at the European Parliament and Council. EUCIS-LLL together with a coalition of 30 stakeholders has made very [concrete proposals](#) on the Regulation but wishes to highlight a particular element, concerning the future of European Civil Society networks. Today, barely 30% of our citizens think that they can personally influence the EU process and this figure is falling¹. Civil society organisations organised at national and European level play a crucial role in contributing to bridge the gap between the EU and its citizens. However, the European Commission proposes to suppress the operational support to them in the future “Erasmus for All”. This decision will have a very negative impact on civil society participation in European affairs. EUCIS-LLL rings the alarm bells and warns the European Parliament and the Council about the risks of not supporting civil society organisations for EU democratic life.

European organisations and platforms have a real added value and long-term impact!

*“Every citizen shall have the right to participate in the democratic life of the Union” as stated in Article 10 of the Lisbon Treaty. European organisations play a crucial role in disseminating and creating ownership about EU policies in lifelong learning at European, national and local level. They voice the concerns and needs of millions of citizens to the EU, having a **real European added value** in bridging the gap between the EU and its citizens. EUCIS-LLL has conducted a survey² that shows that 68,8% of educational actors at national level get information on the “Education and Training Work Programme 2020” (ET2020) from their European networks. Without them it is unlikely that individual organisations and actors will get involved in discussing, contributing and implementing EU orientations and projects in education, training and youth. Furthermore, the organisations that EUCIS-LLL represents are involved in the dialogue that takes place between the EU and representative civil society organisations (Regulation article 9). Those organisations have the expertise and mandate to articulate the needs of beneficiaries at EU level and should be involved in relevant consultation bodies.*

European civil society organisations are not projects!

The draft “Erasmus for All” Regulation does not plan any specific financial support to civil society networks. In the current Lifelong Learning Programme and Youth in Action, European organisations can benefit from **operating grants** under a highly selective process and strict financial rules. Operating grants provide a basic financial support to these European organisations in order to run their activities, allowing them to bring the voice of citizens to EU policy-making. Without this support, they will not be able to represent this voice, as they will have to focus all their efforts on project-based initiatives as foreseen in the Regulation. Furthermore, as they are organised at the European level, most of them are not eligible to get support from the national level. Civil dialogue requires a **specific support** to the civil society organisations that play this particular role at EU level. Of course, we acknowledge that financial support cannot be given without a

¹ Standard Eurobarometer 75 / Spring 2011

² EUCIS-LLL survey on national consultation Forums and Platforms; it collected 293 respondents from 12/2011 to 01/2012. Results to be published in April 2012.

transparent and strict evaluation (i.e. Coalition proposals³). EUCIS-LLL calls on EU institutions to mention the **specific support to European networks via operating grants** in the Regulation (article 8) and remains available to work on the users' guide.

Representative civil society organisations and platforms should be mentioned in the Regulation!

EUCIS-LLL, the European Civil Society Platform on Lifelong Learning, should also be directly mentioned as a **reference civil society partner**. In 2009, the European Commission acknowledged EUCIS-LLL as a “*unique representation*” platform of lifelong learning and as being “*in a unique position to support European networks in education and training to work collectively at European, national and local levels and to contribute to a structured policy dialogue within the open method of coordination in education and training*”⁴. EUCIS-LLL has participated for many years in a dialogue with the EU institutions (i.e. Stakeholders' Forums⁵). European organisations and platforms gather large communities of actors from all over Europe that take an active role in the democratic life of the EU. This is why EUCIS-LLL **should be mentioned as a reference civil society partner** in the framework of a regular dialogue in education and training in the “Erasmus for All” Regulation (article 9).

The EU has recognised that European organisations and platforms are the flagships of democratic steps towards better governance⁶. We need to put these principles in practice by providing clear guidelines for a structured dialogue in education, training and youth⁷ and by supporting representative civil society partners via specific and sustainable funding schemes.

We remain available for further information.

The European Civil Society Platform on Lifelong Learning (EUCIS-LLL) gathers 31 European networks working in education and training. Together, they cover all sectors of education and training including networks for secondary and higher education, vocational education and training, adult education and popular education; networks for students, school heads, parents, HRD professionals, teachers and trainers.
www.eucis-lll.eu

³ 30 stakeholders' messages on the “Erasmus for all”: <http://www.eucis-lll.eu/pages/index.php/positions/ec-programmes>

⁴ 2011 annual work programme on grants and contracts for the Lifelong Learning Programme – Commission Communication C(2010)7190 of 22 October 2010.

⁵ European Stakeholders' Forum: <http://www.eucis-lll.eu/pages/index.php/events/eat-forums>

⁶ “*It is a chance to get citizens more actively involved in achieving the Union's objectives and to offer them a structured channel for feedback, criticism and protest*”. There is a need for “*a coherent approach to representation of civil society organisations at a European level*” which role is “*closely linked to the fundamental right of citizens to form associations in order to pursue a common purpose, as highlighted in Article 12 of the European Charter of Fundamental Rights*” – Communication “European governance: a white paper”, Brussels, 25 July 2001, COM (2001) 428 final.

Ten years after, this has been formalized in the Treaty of Lisbon (2010) “*the institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society.*” – Treaty of Lisbon, Consolidated version of the EU Treaty, article 11, Official Journal of the EU, no. C83 (30 March 2010).

⁷ EUCIS-LLL calls for a structured dialogue in education and training, March 2012: www.eucis-lll.eu



EUCIS-LLL

EUCIS-LLL AMENDMENTS FOR THE “ERASMUS FOR ALL” NEW PROGRAMME

Amendment 1:
Proposal for a regulation
Preliminary consideration (17)

Text proposed by the Commission	Amendment
(17) “The action of the European Youth Forum, the National Academic Recognition Centres (NARIC), the Eurydice, Euroguidance and Eurodesk networks, as well as the eTwinning National Support Centres, the Europass National Centres, and the National Information Offices in the neighborhood countries is essential in order to achieve the objectives of the programme, notably by providing the Commission with regular and updated information regarding the various fields of their activity and through the dissemination of the Programme results in the Union and in the third participating countries.”	(17) “The action of the European Youth Forum, the European Civil Society Platform on Lifelong Learning , the National Academic Recognition Centres (NARIC), the Eurydice, Euroguidance and Eurodesk networks, as well as the eTwinning National Support Centres, the Europass National Centres, and the National Information Offices in the neighborhood countries is essential in order to achieve the objectives of the programme, notably by providing the Commission with regular and updated information regarding the various fields of their activity and through the dissemination of the Programme results in the Union and in the third participating countries.”

Justification

Recognised in 2009 by the European Commission as a “unique representation” platform of lifelong learning and involved for many years in a dialogue with the EU institutions (i.e. jointly organising DG Education and Culture’s Stakeholders’ Forums), EUCIS-LLL should also be directly mentioned as a reference civil society partner in the framework of a regular dialogue in education and training. We advocate (see our [position paper](#)) for the same kind of dialogue implemented in the youth field, as the “policy dialogue with relevant stakeholders” quoted in the draft proposal (art 9) cannot be implemented without clear cooperation guidelines formalised on a legal basis.

Amendment 2:
Proposal for a regulation
Article 3.2 (a)

Text proposed by the Commission	Amendment
1. The European added value of the actions and activities of the Programme shall be ensured in particular through (a) Their transnational character, in particular transnational mobility and cooperation	1. The European added value of the actions and activities of the Programme shall be ensured in particular through (a) Their transnational character, in particular transnational mobility and cooperation

aiming at long-term systemic impact	aiming at long-term individual, organisational and systemic impact
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Justification

Focusing too much on the systemic level can have an adverse effect and impede a broader participation. Indeed, smaller organisations and projects may not have a systemic impact but they do have greater qualitative individual, organisational and societal impacts (especially projects aimed at social inclusion and active citizenship). Civil society organisations should be recognised as agents of social change and innovation and their projects should not be hindered because their impact is not directly measurable. That is the Commission’s role to elaborate innovative assessment methods instead of penalising good initiatives. Besides, a systemic perspective narrows the impact to the formal sector, which covers only a small part of lifelong learning.

**Amendment 3:
Proposal for a regulation
Article 5 (a)**

Text proposed by the Commission	Amendment
“(a) To improve the level of key competences and skills regarding in particular their relevance for the labour market and society, as well as the participation of young people in democratic life in Europe, notably through increased learning mobility opportunities for young people, learners, staff and youth workers, and through strengthened cooperation between education youth and the world of labour market”	“(a) To improve the level of key competences and skills regarding in particular their relevance for the labour market and social cohesion, the participation of lifelong learners and especially young people in democratic life in Europe, as well as personal fulfilment , notably through increased learning mobility opportunities for young people and lifelong learners , staff and youth workers, and through strengthened cooperation between education youth and the world of labour market”

Justification

As improving the level of key competences and skills of lifelong learners is of primary importance in the EU2020 growth strategy for competitive knowledge societies, social cohesion, active citizenship and personal fulfilment are equally important and the impact of a skills upgrade should be as beneficial for individuals’ well-being as for economic performance.

**Amendment 4:
Proposal for a regulation
Article 5 (g)**

Text proposed by the Commission	Amendment
	To promote European citizenship and the European idea through learning and to provide learning spaces to discuss challenges and issues for European cohesion.

Justification

Europe is currently facing not only a financial crisis but also a crisis of the European idea and European cohesion. We believe that education and training and lifelong learning are among the best tools to foster the European idea. In the current crisis and the years after, Europe will need highly skilled workers, but also active citizens that support and promote the European idea and European values. We need creative and innovative people who are resilient and can overcome challenges and difficulties. We need people with all the key competences that improve their own but also other people’s lives. We need citizens who support democracy, human rights and solidarity and do not seek refuge in hateful, nationalistic thinking. Education and training and lifelong learning are indispensable for achieving this.

**Amendment 5:
Proposal for a regulation
Article 6.1**

Text proposed by the Commission	Amendment
<p>“ 1. In the field of education, training and youth, the Programme shall pursue its objectives through the three following types of actions:</p> <p>(a) Learning mobility of individuals,</p> <p>(b) Cooperation for innovation and good practices,</p> <p>(c) Support for policy reform.”</p>	<p>“ 1. In the field of education, training and youth, the Programme shall pursue its objectives through the three following types of actions:</p> <p>(a) Learning mobility of individuals,</p> <p>(b) Cooperation for innovation and good practices,</p> <p>(c) Support for policy reform.”</p> <p><i>These actions shall be tailored to each learner group to ensure that they are given a particular attention in an inclusive Programme.</i></p>

Justification

The regulation is not sufficiently clear regarding the structure of the future Programme. If a structure simplification can be beneficial for final users and to support a lifelong learning approach, , all sectors should still be given equal importance and have adequate opportunities to continue to receive EU support. The present text does not provide those guarantees and the structure needs to be clarified in order to ensure that the Programme is tailor-made for each learner group. The European Economic and Social Committee has for that matter taken over EUCIS-LLL’s advocacy line in the article 1.11 of its Opinion (SOC/438).

**Amendment 6:
Proposal for a regulation
Article 9.1(a)**

Text proposed by the Commission	Amendment
<p>(a) “the activities related to the implementation of the Union policy agenda on education, training and youth (Open Methods of Coordination), as well as the Bologna and Copenhagen processes and the structured dialogue with young people.”</p>	<p>(a) “the activities related to the implementation of the Union policy agenda on education, training and youth (Open Methods of Coordination), (...) the Bologna and Copenhagen processes and the structured dialogue with young people, <i>as well as the promotion of the structured dialogue in the field of education and training.</i>”</p>

Justification

Recognised in 2009 by the European Commission as a “unique representation” platform of lifelong learning and involved for many years in a dialogue with the EU institutions (i.e. jointly organising DG Education and Culture’s Stakeholders’ Forums), EUCIS-LLL should also be directly mentioned as a reference civil society partner in the framework of a regular dialogue in education and training. We advocate (see our [position paper](#) in June) for the same kind of dialogue implemented in the youth field, as the “policy dialogue with relevant stakeholders” quoted in the draft proposal (art 9) cannot be implemented without clear cooperation guidelines formalised on a legal basis.

**Amendment 7:
Proposal for a regulation**

Article 9.1 (b)

Text proposed by the Commission	Amendment
(b) “the implementation in participating countries of Union transparency tools, in particular Europass, the European Qualifications Framework (EQF), European Credit Transfer and Accumulation System (ECTS), European Credit system for Vocational Education and Training (ECVET) and the support to EU-wide networks”	(b) “the implementation in participating countries of Union transparency tools, in particular Europass, the European Qualifications Framework (EQF), European Credit Transfer and Accumulation System (ECTS), European Credit system for Vocational Education and Training (ECVET) (...)” (c) (new) “the specific and sustainable support through operating grants to European civil society associations active in the education and training, lifelong learning and youth fields”

Justification

The draft proposal from the Commission does not plan any specific financial support to European civil society networks contrary to the current Lifelong Learning Programme that was clearly referring to annual operating grants (Decision No 1720/2006/EC, art 3, 5, 36). As defended by the Stakeholders’ Coalition initiated by EUCIS-LLL and the Youth Forum during the Parliament’s public hearing and underlined by the EESC opinion for youth organisations (art 5.5 of the Opinion (SOC/438)), those organisations bring the voice of citizens to EU policy-making – what they cannot do anymore if they have to focus their effort on project-based initiatives. A genuine civil dialogue with civil society requires this specific support and European networks proved their EU added value and impact along the years, even though we concede that such a support should come with a highly selective process and strict financial rules.

**Amendment 8:
Proposal for a regulation
Article 9.1(d)**

Text proposed by the Commission	Amendment
(d) “the European Youth Forum, the National Academic Recognition Centres (NARIC), the Eurydice, Euroguidance and Eurodesk networks, as well as the eTwinning National Support Centres, the Europass National Centres, and the National Information Offices in the neighborhood countries and acceding countries, candidate countries and potential candidates not fully participating in the programme.”	(d) “the European Youth Forum, the European Civil Society Platform on Lifelong Learning , the National Academic Recognition Centres (NARIC), the Eurydice, Euroguidance and Eurodesk networks, as well as the eTwinning National Support Centres, the Europass National Centres, and the National Information Offices in the neighborhood countries and acceding countries, candidate countries and potential candidates not fully participating in the programme.”

Justification

Recognised in 2009 by the European Commission as a “unique representation” platform of lifelong learning and involved for many years in a dialogue with the EU institutions (i.e. jointly organising DG Education and Culture’s Stakeholders’ Forums), EUCIS-LLL should also be directly mentioned as a reference civil society partner in the framework of a regular dialogue in education and training. We advocate (see our [position paper](#) in June) for the same

