

**EU COORDINATOR ON ANTI-RACISM  
MICHAELA MOUA  
EUROPEAN COMMISSION**

*[Letter sent via email]*

Brussels, 7th July 2021

**Dear Michaela,**

We are writing to ask to meet with you to discuss the application form required for organisations to participate in the civil society consultations planned under the EU Anti-Racism Action Plan (ARAP).

We believe the requirements in the application form<sup>1</sup> place a restrictive burden on many civil society organisations representing racialised communities and could prevent meaningful and inclusive participation. This process will disproportionately impact grassroots civil society movements whose voices and input are invaluable. The concept of an application form also goes against the principle of self-organising which is an important benchmark of a healthy civic space.

After careful examination and consultation, we have identified four main areas of concern:

**CV** - The requirement of a CV will favour more established and professionalised organisations or individuals and limit the involvement of smaller and less established ones. There is also no transparency in relation to the process of assessing CVs and currently, no role has been envisaged for civil society to co-assess CVs and help select organisations.

**Mission and values aligned with the Commission** - As such, the Commission has a wide range of discretionary powers when assessing applications and there is no obvious guidance for applicants to demonstrate that they adhere to this criteria. Furthermore, this may also contribute towards a chilling effect on the ability of organisations to criticise the work of the Commission.

It is unclear if organisations or individuals, who have been unfairly and harshly criticised by their home Member State or the European institutions, will be successful given the abstract and wide-ranging interpretation.

**Independent status and legal registration in the EU** - This requirement will prevent some national and local grassroots organisations from being able to apply as they do not have the financial capacities to officially register at the EU level. Members of racialised communities also face a number of difficulties to set up organisations and there is a big risk that organisations who have direct grassroots level experience or represent increasingly marginalised and excluded communities will end up being excluded from the consultations.

<sup>1</sup> [https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/racism-and-xenophobia/consultation-process\\_en](https://ec.europa.eu/info/policies/justice-and-fundamental-rights/combating-discrimination/racism-and-xenophobia/consultation-process_en)

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**Language** - The requirement for organisations to have a good working knowledge of English is exclusionary - especially for many national, regional and local grassroots organisations, who would be routinely left out from EU level consultations because of language criteria. This should and could be avoided by expanding the languages to French, German and English, in line with the Commission's working languages and by providing translation and or interpretation, at least for key consultation meetings.

In terms of moving forward, we would like to propose the creation of a coordinating group of civil servants and experienced activists from key NGOs with a good knowledge of the anti-racism movement who could assist in the assessment of the applications.

We would like to discuss with you this proposal further and some of our concerns in relation to the application. We believe that it is important that we address some of the above so we can ensure the fair representation of groups.

Finally, we believe that the ARAP civil society consultations should be only one layer of a wider and more inclusive process towards establishing a sustainable consultative and participatory process and mechanism for engagement with civil society representing racialised communities.

We look forward to hearing from you.

Yours sincerely,

**European Network Against Racism (ENAR), Co-founder of Anti-Racism Action Plan Civil Society Coalition**

**European Roma Grassroots Organisation Network (ERGO), Co-founder of Anti-Racism Action Plan Civil Society Coalition**

**Equinox Initiative for Racial Justice, Co-founder of Anti-Racism Action Plan Civil Society Coalition**