

Brussels, 27th of June 2016

Subject: European Parliament own-initiative report on financing NGOs

Dear Member of the European Parliament,

We are writing with regards to the own-initiative report on financing NGOs on which the BUDGET committee is preparing an opinion for which the vote was initially scheduled on next Thursday 30th June. The European Federation of Allergy and Airways Diseases Patients' Associations (EFA) is the umbrella organisation representing more than 30% of the European population living with allergy, asthma and chronic obstructive pulmonary disease (COPD).

Patient organisations make a unique contribution to the public health debate, voicing the experience and expertise of the healthcare users, their constituents. At European level, they play a role in promoting higher standards of care, better access to care and more coordination of health policies across the European Union. We believe this important contribution should be recognised and funded appropriately.

We would like to share with you EFA's views on the amendments that have been tabled to your draft opinion, as you are busy preparing compromises in view of next week's vote. We are in favour of all amendments that contribute to promote efficiency, simplification and transparency in the use of funds. However, this should not lead to increase budgetary control procedures that are already quite heavy and numerous, but rather make these controls more effective. Also, information is already provided by NGOs when submitting projects and in all phases of implementation and control. Therefore, we think the issue is more for the Commission to improve the way data is gathered to make it available to the budgetary authority.

For this reason, we are in favour of most of the amendments tabled: [1](#), [2](#), [3](#), [4](#), [5](#), [6](#), [8](#), [9](#), [10](#), [12](#), [14](#), [17](#), [21](#), [23](#), [24](#), [26](#), [27](#), [28](#), [29](#), [31](#) and [32](#) as they contribute to strengthen your proposal. However, we are against the following amendments: [7](#) (on the destabilising impact of NGOs on entire countries), [11](#) (on data on financing NGOs from abroad), [22](#) (on the deletion of "use it or lose it" and delays in payments), [28](#). EFA supports unequivocally the transparency principle that should apply to NGOs. Nonetheless, we find that amendment [25](#) asking for NGOs to be "more transparent" and "that their sources of financing should be made public; as should the ways in which they use their funding" is a bit tricky in its current wording. Indeed, it suggests that NGOs are currently not transparent enough and not displaying their sources of funding, when many NGOs including patient organisations already meet high standards of transparency. We would therefore prefer to see a more nuanced amendment encouraging and supporting NGOs to reach even higher standards.

There are also some other amendments that are problematic and could be improved:

- Amendment [16](#) as drafted is counter to the freedom of expression. Of course, NGOs need to respect EU values and fundamental rights, but NGOs' right to oppose public policies when they are against the public interest and EU values should not be undermined.
- Amendments [18](#) and [19](#) impose a minimum co-funding level across the board to all EU programmes. As the European Commission has stated during the debate on the amendments, the financial regulations do not set any co-funding requirement level. Horizon 2020 for instance allows for NGOs to receive funding up to 100% of the costs. Other examples exist for youth programmes, etc.



European Federation of Allergy and Airways
Diseases Patients' Associations

- Amendment 20 seems to imply that funding is counter to advocacy.
- Amendment 30 could be accepted as an addition, not as a replacement for in kind funds.

We thank you for your attention and we stay at your disposal should you have any further question.

Sincerely,

Mikaela Odemyr
EFA President