

# Structural Funds 2014-2020: What room for social inclusion and for the involvement of NGOs?

Mapping by EAPN national networks of the integration of social inclusion and of the participation of civil-society organisations in the design of Partnership Agreements and Operational Programmes

2014-2020 Structural Funds contribution to the poverty-reduction target

DECEMBER 2013

## Introduction

For the last 10 years, EAPN has been a key actor at EU level pushing for a full and genuine enforcement of the Partnership Principle in Structural Funds to make sure that NGOs can get involved both in the strategic planning and in the project delivery.

This has always been seen by EAPN Members as the most effective way for Structural Funds to successfully deliver on social inclusion. It is even more crucial that Structural Funds should support the delivery on the headline targets of Europe 2020, especially the poverty reduction one.

### **A promising proposal watered down by the Council**

When the Commission released its legislative proposals for the Structural Funds' Regulations 2014-2020, EAPN warmly welcomed the strengthening of the Partnership Principle through article 5 of the draft Common Provisions Regulation (CPR) (art. 5.2 *"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"*) as well as the elaboration of a European Code of Conduct on Partnership.

Unfortunately, this promising proposal has been watered down by the Council which did not want to give this new document any binding character nor to see the Partnership Principle being applied retroactively.

Nevertheless, Member States committed themselves to take into consideration as much as possible the Partnership Principle as defined in the Draft CPR Regulation, during the whole process of the preparation of the Partnership Agreements (PAs) and Operational Programmes (OPs).

### **EAPN keeps a close eye on the progresses made**

In October 2012, EAPN published its toolkit on Structural Funds for social NGOs aiming at helping its national networks to get involved in the design of the PAs and OPs.

In February 2013, EAPN launched a consultation among its 25 national networks to assess whether Member States concretely implemented the new provisions on the Partnership Principle and how far the poverty reduction target was reflected so far in the discussions on the content of the draft PAs.

10 national networks of EAPN were able to send detailed responses to this consultation, namely EAPN Austria, Czech Republic, Denmark, France, Germany, Ireland, Italy, Poland, Portugal and Spain (see summary table below) – most others were not able to get actively involved in the drafting of the PAs. Even though this prevents us from drawing general conclusions on the way the new provisions on the Partnership Principle have been implemented throughout the EU, it does reflect the lack of will to involve civil-society organisations in a genuine partnership process.

More formal national consultation processes have been implemented. However, from EAPN members' assessment, the Partnership Principle still remains a rhetorical exercise leaving the real power in the hands of public administration.

## Key Messages

### ✓ Positive findings

- ✓ On the **partnership principle: Official consultation processes** have been organised on the drafting of the PAs and Ops **involving social NGOs** in several countries (AT, CZ, DE, FR, IE, IT, PL, SP) and social NGOs will be part of the monitoring committees of the OPs in a few countries (IE, ES).
- ✓ In a minority of cases (ES, DE, IT, PL), **EAPN National Networks managed to get their views taken on board and incorporated** into the draft PA and, to a lesser extent into the OPs. Thanks to the new provisions on social inclusion/ poverty reduction (i.e. the 20% ESF earmarked as well as the ex-ante conditionality on social inclusion/ poverty reduction) and the pressure put by social NGOs on their Managing authorities, the **anti-poverty agenda is better reflected** in the Structural Funds' programming documents 2014-2020 in those countries than it has been up to now. There is even national ESF OPs in 2 countries being setting up specifically on social inclusion/ poverty reduction (the Italian OP on social inclusion and the Spanish OP against discrimination respectively).

### ✗ Negative findings

- ✗ From a **procedural point of view**, there is **clearly still room for improvement**: too little time given to stakeholders to react on the consultation documents, no real exchange with national authorities and too little information given to stakeholders. All of that led some of our members (CZ, DK, FR, IE, PT) to conclude that they participate in a merely formal exercise organised by national authorities to cope with the new requirements of the draft Common Provisions Regulation (art. 5 on the Partnership Principle and art. 13 on the Partnership Agreement).
- ✗ On the **content** side: EAPN Members still deplored the **low priority level given** in the PAs **to the delivery on the poverty reduction target** through integrated social inclusion approaches. This clearly shows a contradiction with the clear role given to Structural Funds to deliver on the poverty reduction target in the regulation (especially the 20% of the ESF earmarked for social inclusion and poverty reduction). Several EAPN Members (AT, CZ, DK, FR, PT) put forward several issues that could jeopardize a meaningful contribution of Structural Funds to the poverty reduction target:
  - Lack of detailed information on the content side and a fear that labour-market oriented activities will overlook more integrated social inclusion approaches;
  - No decision still being made on the budget attached to it;
  - No real progress on social inclusion proofing (which would allow managing authorities to evaluate progress towards social inclusion/labour-market integration);
  - A tendency to outsource the management of Structural Funds to private entities which entails two risks: weakening the social inclusion component (with more fragmented projects/ creaming phenomenon) and making access to Structural Funds for NGOs more difficult.

## Key Recommendations

### *On the partnership principle:*

- ⇒ **European Commission Guidelines setting out clear criteria and indicators to measure the quality of the partnership** should be developed to help EC Desk Officers in assessing to what extent all relevant stakeholders including NGOs have been meaningfully involved by managing authorities in the preparation of the programming documents (PAs and OPs) on the basis of the elements laid down in the European Code of Conduct to delivery.
- ⇒ These guidelines should also include the **participation of social NGOs in all the relevant ESF, ERDF monitoring committees** as well as **the use of technical assistance and capacity-building** to make sure that NGOs can play an effective role in the national/ regional processes with an active surveillance by ESF Desk Officers on the compliance by **managing authorities** of their obligation **to allocate “an appropriate amount of ESF resources to capacity-building for NGOs”** (art. 6.3 ESF Regulation).
- ⇒ **The implementation of the partnership principle should be monitored on a yearly basis during the implementation of the next programming period through the European Semester process** (both through the NRPs and CSRs).

### *On how to better deliver on the poverty reduction target:*

- ⇒ While negotiating with Member States on the PAs and OPs, the European Commission should make sure that **poverty reduction and social inclusion is listed as a core priority and cross-cutting theme and backed by clear and adequate financial resources.**
- ⇒ **The European Commission should closely monitor that, within each Member State, each Region earmarked** at least 20% of the ESF for social inclusion and poverty reduction.
- ⇒ **Member States/Regions must transpose the ex-ante conditionality on poverty reduction into their PAs and OPs** monitored by the European Commission (notably) through an **annual reporting in the NRPs and CSRs on Member States’ progress** to deliver on their commitments.
- ⇒ **Member States/Regions** should use Structural Funds to implement **integrated active-inclusion approaches** as essential to the delivery on the poverty-reduction target.
- ⇒ **The European Commission** should set up a **European Task Force which will bring together all relevant stakeholders including NGOs** to promote exchange of good practices on how **to make transnational cooperation through ESF more bottom up and inclusive with a clear linkage to the European Platform against Poverty (EPAP).**

## Summary Table of EAPN National Networks' assessment of the partnership principle and social inclusion

Country	National processes on Partnership Agreements (PAs) and OPs	EAPN's engagement	Profile given to Social inclusion and NGOs involvement
<b>Austria</b>	<ul style="list-style-type: none"> <li>Official and open consultation process on the drafting of the PA has been launched involving a wide variety of stakeholders.</li> <li>Different workshops have been organised</li> </ul>	<ul style="list-style-type: none"> <li>EAPN Austria has a seat in the consultation process but without voting rights.</li> <li>Engagement in Structural Funds-funded projects on youth. It might lead to an opening in the next programming period.</li> </ul>	<ul style="list-style-type: none"> <li>One workshop has been organised on working poor.</li> <li>Overall assessment of the workshops: really good input from research center and good discussion but what about the social inclusion profile?</li> </ul>
<b>Czech Republic</b>	<ul style="list-style-type: none"> <li>Through the Commission for social inclusion (inter-ministerial body coordinated through the Ministry for social affairs) involving 7 NGOs (including EAPN Czech republic), the consultation process on the drafting of the programming documents (both partnership agreement and OPs) was done.</li> </ul>	<ul style="list-style-type: none"> <li>EAPN Czech Republic tried to influence the ex-ante conditionality, development of complex Strategy for social inclusion 2014-2020 (MPSV – Ministry for work and social affairs), and complex solution to social housing (Ministry for local development) and gave feedbacks on the parts related to social inclusion.</li> </ul>	<ul style="list-style-type: none"> <li>The content on social inclusion seems pretty OK but there are no budgetary figures attached to it. There are neither detailed information, nor indicators allowing a qualitative evaluation (social inclusion proofing) and only general target groups.</li> <li>Employment is predominant throughout the programming documents at the expense of softer and integrated social inclusion approaches.</li> <li>Subcontracting of ESF monitoring through technical assistance to private companies (unlike direct monitoring through Ministry of work and social affairs) is likely to weaken even more the social inclusion strand and its accessibility for NGOs. The very technical controlling approach does not reflect broader, long-term inclusion standards.</li> </ul>

Country	National processes on Partnership Agreements (PAs) and OPs	EAPN's engagement	Profile given to Social inclusion and NGOs involvement
<b>Denmark</b>	<ul style="list-style-type: none"> <li>▪ An inter-ministerial group has been set up where four ministries are represented, including the Ministry of Social Affairs. There are no social NGOs involved.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EAPN Denmark got in touch with this inter-ministerial group by presenting its views on how the next programming period of Structural Funds should look like.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The ESF is supposed to better promote social inclusion as stated in the Danish NRP. So, it is expected that a much larger number of projects that have socially vulnerable target groups and social inclusion are in their objectives.</li> <li>▪ EAPN Denmark asked for changes but no real outcomes could be noticed.</li> </ul>
<b>France</b>	<ul style="list-style-type: none"> <li>▪ A National drafting body of the PA (INPAP) has been set up to drive the process with a consultation document produced.</li> <li>▪ A national partnership involving more than 300 stakeholders invited to send their written contribution.</li> <li>▪ Around 80 organisations divided into 4 groups (State, Local authorities, Social Partners and Civil Society Organisations, economic actors) involved in the different stages of the drafting process.</li> <li>▪ Thematic workshops organised in April (Promoting social inclusion and fighting against poverty, 4 April)</li> <li>▪ Consultation process lasting until end of October.</li> <li>▪ 4 June: Presentation of the very first draft of the partnership contract.</li> <li>▪ 2 other meetings were organised mid-July and mid-October to finalize the drafting.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EAPN France as a network has not been involved in the SF national processes but several of its Members are: UNIOPPS, FNARS, Agence Nouvelle des Solidarités Actives.</li> <li>▪ Joint or individual written contributions were sent.</li> <li>▪ Participation in the workshop on Social Inclusion and Poverty Reduction.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Quite a good NGO involvement from a procedural, formal point of view</li> <li>But: <ul style="list-style-type: none"> <li>✗ Little time given to stakeholders to react on the consultation doc (a month)</li> <li>✗ No real exchanges with national authorities, very little info, low attendance</li> </ul> </li> <li>▪ A low profile given to Social Inclusion: risk of concentrating ESF intervention on helping people to get back to work or, at best, Work Integration Social Enterprises (WISEs) but no real support to integrated active inclusion approaches foreseen or broader social inclusion.</li> </ul>

Country	National processes on Partnership Agreements (PAs) and OPs	EAPN's engagement	Profile given to Social inclusion and NGOs involvement
<b>Germany</b>	Ongoing well-established negotiation process between the Ministry for Labour and Social Affairs and welfare organisations for the drafting of the PA.	<ul style="list-style-type: none"> <li>▪ Welfare organisations / EAPN Germany working on a new partnership programme for the sector 'social economy'. Main objectives are: Improvement of individual adaptability and rebuilding of own employability for staff and new staff in the different areas of social work (e.g. care for the elderly, child care etc.) and strengthening the social enterprises to support the demographic change (e.g. compatibility family and job).</li> <li>▪ Welfare organisations / EAPN Germany in contact with the Ministry for Families, Seniors, Women and Youth to clarify how to organise a guideline within the partnership approach for those who are the furthest from the labour market to strengthen their employability for a possible integration into the labour market.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Partnership principle: structured</li> <li>▪ Apparently low profile given to social inclusion and a focus on job-oriented measures targeting those who are close to the labour market. Welfare organisations/EAPN Germany proposal for the target group 'far from the labour market' was not approved by the Ministry for Labour and Social affairs.</li> <li>▪ In some Lander, specific guidelines to combat poverty and promote social inclusion are prepared for the new funding period to improve, increase and rebuild own employability through: <ul style="list-style-type: none"> <li>▪ Consultancy and coaching of individual living situation</li> <li>▪ Strengthening educational competencies</li> <li>▪ Health promotion</li> <li>▪ Improvement of educational opportunities</li> <li>▪ Identification and piloting of employment opportunities</li> </ul> </li> </ul>

Country	National processes on Partnership Agreements (PAs) and OPs	EAPN's engagement	Profile given to Social inclusion and NGOs involvement
<b>Ireland</b>	<ul style="list-style-type: none"> <li>▪ There was an official invitation to make written submissions on the Partnership Agreement in March 2013 with about one month to submit. A very brief summary of the findings of this process was circulated in July with a commitment to further consultation on a draft PA in the autumn.</li> <li>▪ Initial consultation on the various OPs started late in 2013 involving a mixture of written submissions and meetings. The initial process for the ESF took place in October.</li> </ul>	<ul style="list-style-type: none"> <li>▪ EAPN Ireland and many other NGOs made submissions to the Partnership Agreement.</li> <li>▪ Europe 2020 Working Group of EAPN Ireland tried to have an ad hoc meeting about the drafting of the Partnership Agreement.</li> <li>▪ EAPN Ireland also made a submission on the European Agricultural Fund for Rural Development.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The draft Partnership Agreement and Operational Programmes are still being finalized. However, it is clear that through the national partnership structure in Ireland, the Community and Voluntary sector (social NGOs) will have a place on the monitoring committee of the Partnership Agreement and each of the OPs.</li> </ul>
<b>Italy</b>	<ul style="list-style-type: none"> <li>▪ Late December 2012: A document called <i>Methods and objectives for the effective use of EU Funds 2014-2020</i> issued by the Government to launch a public debate (deadline to respond: 15<sup>th</sup> February). In this document, there is a section on "partnership mobilization" (design of programmes, open public evaluation).</li> <li>▪ From January to early Spring 2013: open public evaluation (i.e. discussion between central Government, regions and local authorities; and socio-economic actors identified according to criterion of representation and relevance to the topics of programming). This led to a Proposal for a Partnership Agreement drafted by a technical drafting Group.</li> <li>▪ From 22 to 24 April, meetings were held with the European Commission, which has called for a greater concentration of assistance provided through a bundling of actions within the</li> </ul>	<ul style="list-style-type: none"> <li>▪ CILAP (EAPN Italy) sent a letter to the Minister for Territorial Cohesion, the Department for Development and Economic Cohesion and the Ministry for Labour and Social Policy to ask to be included in the stakeholders involved and to participate in thematic groups dealing with the issue of the fight against poverty and social inclusion.</li> <li>▪ CILAP issued its written contribution with key points (strengthening care services, supporting active inclusion through a better linkage between financial benefits and services, going beyond social experimentation, strengthening the information system of social benefits, supporting the population below the poverty threshold).</li> <li>▪ 27 February and 19 March: CILAP took part as a Civil Society Organisation Representative in the national Group C: Quality of life and inclusion</li> </ul>	<ul style="list-style-type: none"> <li>▪ The process of involvement of social partnership is quite open, even beyond the "institutional" partnership. But the organisations involved do not always effectively represent the target groups. It is necessary to provide learning paths, technical assistance and empowerment for NGOs to play an effective role in programming and implementation.</li> <li>▪ Thanks to the EC, the draft PA states that the 2014-2020 programming plans should support the anti-poverty objective through a number of strategic guidelines.</li> <li>▪ At least 20% of the total ESF resources shall be allocated to the Thematic Objective 9 "promoting social inclusion and combating poverty." Notwithstanding the foregoing, the resources assigned by the ERDF in that</li> </ul>



	<p>thematic objectives.</p> <ul style="list-style-type: none"> <li>▪ The draft PA provides for the establishment of a National Operational Programme "Social Inclusion (poverty and network)" with schemes to combat poverty through active inclusion</li> <li>▪ After finalization by the institutions of the European multi-annual budget and regulations on cohesion policies, the Italian Government, on the initiative of the Minister for territorial cohesion, will present the final draft PA to the European Commission.</li> </ul> <p>In the meanwhile Regions are working for the definition of regional OP, through a similar process of partnership at regional level.</p>	<ul style="list-style-type: none"> <li>▪ The province of Reggio Calabria asked CILAP to be supported in meetings organised with the municipalities for the establishment of the Provincial Plan for social inclusion and the fight against poverty to be proposed to the Region for the programming of the 2014-2020 OP.</li> <li>▪ TECLA (Association between municipalities and local authorities) asked CILAP to support them about how the local and regional authorities can and must take action to ensure social innovation and active inclusion, through a participatory approach and collaboration between public and NGOs; how to hamper the phenomenon of poverty and promote pathways of social inclusion, in the framework of 2014-2020 SF (meetings in Ascoli Piceno, Reggio Calabria, Busto Arsizio - MI).</li> </ul>	<p>thematic objective, may be counted towards the 20%.</p> <ul style="list-style-type: none"> <li>▪ In Thematic Objective 9 the Expected Result 9.1 "Reduction of poverty, social exclusion and social innovation (the extension of the social card was defined, and is included in the current version of the PA (DI 28/06/2013))."</li> </ul> <p>Among the actions planned:</p> <ul style="list-style-type: none"> <li>▪ Experimental measures targeting families living in poverty or social exclusion, with particular attention towards households with children. The programme, supported by a network of services operating in an integrated way, shall be based on economic aid to be granted upon the beneficiaries' participation in a social inclusion project (according to "Active inclusion strategy") (Conditional Cash Transfers).</li> <li>▪ Interventions targeting people who are the most distant from the labour market will be implemented through a broad and diverse active inclusion.</li> <li>▪ In rural areas with high unemployment rate as well as high risk of exclusion: The PA underlines the importance of implementing young people's employment in agriculture also through the innovative use of land (social farming and collective use of lands confiscated from organised crime).</li> </ul>
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Country	National processes on Partnership Agreements (PAs) and OPs	EAPN's engagement	Profile given to Social inclusion and NGOs involvement
<b>Poland</b>	<ul style="list-style-type: none"> <li>▪ Government set up an Inter-ministerial Group (without partners and NGOs) to ensure the coordinating work on the designing process of the partnership agreement and OPs.</li> <li>▪ For each OP, an Inter-ministerial Group was established with Working groups (including NGOs).</li> </ul>	<ul style="list-style-type: none"> <li>▪ A coalition of polish NGOs networks (including EAPN Poland) established a permanent Conference aiming at improving the NGOs profile in the next programming period of Structural Funds. This started in 2012 with a document consisting of 12 demands.</li> <li>▪ EAPN Poland was member of the working group responsible for OPs with a social inclusion and anti-poverty goal. EAPN Poland sent 53 amendments.</li> <li>▪ EAPN Poland prepared and promoted guidelines for regions in the field of social inclusion and poverty reduction.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The coordinating ministry at central level responded with some ambiguity to the 12 demands put forward by the coalition of polish NGOs with some openness for cooperation.</li> <li>▪ In the preparatory phase of the OP with anti-poverty goal, (18 out of the 53 amendments put forward by EAPN Poland were fully or partially adopted).</li> </ul>

<p><b>Portugal</b></p>	<ul style="list-style-type: none"> <li>▪ Council Minister Resolution of 26 Nov 2012 giving the political guidelines of the CSF and the negotiation process with the European Commission: Social Cohesion one of the 4 priorities.</li> <li>▪ Among the 5 objectives, one is about the integration of people at risk of poverty and the fight against social exclusion.</li> <li>▪ At national level, a state-owned organisation (CASES) involving most of major umbrella organisations of the 3rd sector drives the process of gathering contributions and defining working groups.</li> </ul>	<p>EAPN Portugal is involved both at national and regional levels:</p> <ul style="list-style-type: none"> <li>▪ At National level: EAPN Portugal produced a position paper on the new programming period and sent it to Ministries. On March 20, EAPN Portugal organised a seminar on Structural Funds with 160 participants and with the participation of representatives of the national government and the institutions about the Operational Programmes at national level.</li> <li>▪ At regional level: EAPN Portugal is involved in 3 Regions in Regional Coordination and Development Commissions (CCDR).</li> </ul>	<p>On paper, the poverty reduction target is well-reflected in official documents.</p> <p>But, will it remain the same once the partnership contract is finalized?</p>
<p><b>Country</b></p>	<p>National processes on Partnership Agreements (PAs) and OPs</p>	<p>EAPN's engagement</p>	<p>Profile given to Social inclusion and NGOs involvement</p>
<p><b>Spain</b></p>	<ul style="list-style-type: none"> <li>▪ The Government asked the State Council of Spanish NGOs (with EAPN ES, Red Cross, Caritas, Foundation on Roma/Gypsies: Secretariado Gitano...) to make proposals on the drafting of the Spanish PA.</li> <li>▪ Mid-February: Government (Ministries for Finances and Labour) organised a meeting with the State Council of Spanish NGOs to exchange on their proposals.</li> </ul>	<p><b>At national level:</b></p> <ul style="list-style-type: none"> <li>▪ At the request of the Government, the State Council of Spanish NGOs made their proposals to feed into the drafting of the PA. These proposals cover a wide range of topics (diagnosis, mainstreaming poverty reduction and social inclusion in the different thematic objectives, making the implementation scheme more favorable to social inclusion, strengthening the horizontal objectives and ensuring easier access to SF for social NGOs, calling for the continuation of the anti-discrimination OP...).</li> <li>▪ The President of EAPN Spain presented these proposals during a meeting organised by the Government</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Spanish Government gave very good feedback on the proposals made by the State Council of Spanish.</li> <li>▪ The 20% ESF earmarked for poverty reduction will be fully reflected.</li> <li>▪ The Spanish ESF OP against discrimination is going to be spread to other regions and be more open to other NGOs.</li> </ul>

		<ul style="list-style-type: none"><li>▪ Bilateral meetings with the Ministry of labour.</li></ul> <p><b>At regional level:</b></p> <ul style="list-style-type: none"><li>▪ Training sessions organised by EAPN Spain regional networks in 8 regions.</li><li>▪ Roundtables with Director Generals in charge of Structural Funds in each of the 8 regions. EAPN Spain regional networks invited to be part of planning teams for Ops.</li></ul>	
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