

Dear Leo, and all

Thank you for the opportunity to give input to the process.

Two different threads were initiated last week, “Regional representation” + “Potential new structures - ensuring representation and avoiding domination”. We choose here to treat them as one.

To EAPN SE, and we are confident that the same applies to all, a set of values and principles guide us:

- Organizational democracy
- Transparency
- Participation
- Balancing European and national perspectives

Additionally, what we and others called for at EXCO Pamplona was, among other ideas, an **impact assessment**, and different **scenarios** to discuss. Since Pamplona and the proposals were put forward we have only had time to discuss this within EAPN Sweden.

Starting with a **general and overarching level**, we find that it is much preferable to have **whole proposals on the table**. Only then will it be possible to actually **assess impact** in relation to e.g. the principles above. Fragmenting the proposals, and thus the debate, takes us in an opposite direction.

Among general discussions that we should have, before we go “into the weeds”, is one on the **balance between EU level and national level**. If regions become part of the package, then that layer must also be discussed in an imaginative and principled way.

If we go into **details**, we find the following:

- **An EXCO of 18 members** is probably an absolute minimum, to ensure democratic representation, and a sense among NNs and EOs that “we’re in this together”, not merely as adjuncts to the EU level
- **Mandate periods** should be discussed **in relation to representation**, i.e. as part of the entire package
- It is important that **EUISG is kept as an overarching body** for policy development, and with principles for representation similar or identical to what the EXCO may become
- We are in principle in favour of some kind of **regional representation**
- The regions should **constitute themselves**, in terms of EXCO (and EUISG) representation
- If regionalization becomes a reality, then **economy implications and the workload for regional intermediaries/EXCO-members** must be taken into account in the impact assessment
- As regionalization will add layers, **time frames for discussions and referrals** must be extended accordingly and probably considerably; two/2 weeks, as mentioned, are nowhere near enough for any hypothetical regions to have functional discussions
- If regional representation is to become a feature of a future EAPN, it is crucial that we in this phase of deliberation **consider “regions” concretely**, and not merely as an abstraction

- What is called for is, thus, a **bottom-up discussion among the regions**, e.g. the Nordic countries, that would potentially result from an upcoming proposal; **such new structures need to be given sufficient time, and cannot be rushed**

As for process, and given the outcome of EXCO April/Pamplona, we take it as an additional given that **sufficient time will be allocated in June/Brussels**, and preferably that **EXCO and EUISG have a joint session** for discussion.

Finally, we **strongly encourage that our positions in this letter are shared more widely** by you in Brussels/Bureau ahead of the June meeting, beyond those on the mail lists for “Regional representation” + “Potential new structures”.

Kind regards

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