

Warsaw, 21 January 2020

Ms Beate Gminder  
Director  
DG Migration and Home Affairs  
European Commission  
Rue du Luxembourg 46,  
1000 Bruxelles  
Belgium

Dear Director Gminder,

We are addressing this letter to you as a group of civil society organizations working in Poland in the field of integration of migrants.

As the new financial perspective providing funding in the areas of legal migration, asylum and integration of migrants is currently under consideration, we would like to take this opportunity to share our perspective on the subject.

The organizations we represent have been receiving AMIF funding in Poland since 2015 (and previously from ERF and EIF). We have experienced a time when distribution of AMIF funds at the national level was withheld, then severely limited, for political reasons.<sup>1</sup> We believe that our experience may be valuable in the decision-making process while drafting the new financial perspective. As, unfortunately, it is highly likely that the difficulties we have recently faced in Poland may recur elsewhere in the European Union in the near future..

Main concerns and problems related to AMIF implementation:

- The AMIF was designed to strengthen the national infrastructure for integration of migrants, however, in practice it rather served to weaken civil society organizations operating in this field. An unpredictable agenda, cancellation of calls for proposals, lack of consultation or dialogue had a negative impact on NGOs' financial stability and their overall capacity. Four calls for proposals announced in 2016 were subsequently cancelled, which severely limited funding opportunities for civil society organizations for about three years.<sup>2</sup> Information about the results of such calls was withheld for months, which kept NGOs waiting with a sense of insecurity. Eventually, as a result of the cancellations some organizations had to close down, many lost their experienced staff and the support provided to beneficiaries was severely reduced.<sup>3</sup>

---

<sup>1</sup>The role of European Funds in supporting the integration of migrants in Poland, Witold Klaus, Ewa Ostaszewska-Żuk, Marta Szczepanik, 2017, available at: [https://www.hfhr.pl/wp-content/uploads/2017/11/Po-FAMI-raport\\_EN.pdf](https://www.hfhr.pl/wp-content/uploads/2017/11/Po-FAMI-raport_EN.pdf)

<sup>2</sup>Ibidem

<sup>3</sup>Ibidem

- Two open calls for applications under AMIF were announced in March 2019. In contrast to FAMI calls from 2015, this time the calls specified in great detail the projects and activities that could possibly be financed from the Fund, leaving very little space for innovative solutions. They also indicated that comprehensive projects, i.e. ones involving various types of activities (legal, psychological and social aid, Polish language courses, support for foreign students and persons who work with them, etc.) would be given priority. This led to a situation where organizations specialising in specific fields (e.g. discrimination based on ethnicity) or smaller organizations had fewer chances to propose competitive projects. As a result, the number of civil society entities applying for funding significantly decreased in 2019. Consequently, the number of projects implemented by them also dropped. At the same time, the number of migrants is growing (Poland is now the top receiving country in terms of economic migrants).
- Civil society has not been treated as an equal partner, a dialogue between the government and non-governmental actors has still not been initiated since 2016. Priorities of AMIF in Poland are not clear; some important areas are not funded, or funded at a very limited level (research, monitoring, legal advice). In the Due to a lack of national migration and integration policy documents, the overall country strategy in these policy areas remains unclear. We are convinced that politics rather than real integration needs play an active role in allocation of funding.
- After five years of AMIF, with an increase in the number of migrants previously unheard of in the country, growing xenophobia and anti-migrant rhetoric in the public space<sup>4</sup>, Poland has fewer stable organizations working in the field of migration and integration which, in addition, struggle to maintain their operation in the unfriendly environment.

#### Implementation of AMIF under Polish national programme

No	Year	Topic	Call available for NGOs	Number of applications	Number granted
1	2015	Asylum	Yes	13	4
2	2015	Integration	Yes	89	46
3	2016	Integration	Yes	49	CANCELED
4	2016	Asylum	Yes	24	CANCELED
5	2016	Integration	Yes	57	CANCELED
6	2016	Asylum	Yes	12	CANCELED
7	2017	Integration	No (Voivods <sup>5</sup> only)	32	31
8	2017	Integration	Partially (only as partners of Voivods)	16	16
9	2019	Return	Yes	1	1 - IOM
10	2019	Integration	No (Voivods only)	15	15
11	2019	Asylum	Yes	15	6
12	2019	Integration	Yes	47	21

<sup>4</sup>Ombudsman (Rzecznik Praw Obywatelskich, RPO), *Rekomendacje Komitetu ONZ ds. Likwidacji Dyskryminacji Rasowej (CERD) po XXII-XXIV sprawozdaniu Polski*, 30 August 2019, available at: <https://www.rpo.gov.pl/pl/content/rekomendacje-komitetu-onz-ds-likwidacji-dyskryminacji-rasowej-cerd-po-xxii-xxiv-sprawozdaniu-polski>; Office of the High Commissioner for Human Rights, CERD - International Convention on the Elimination of All Forms of Racial Discrimination, Concluding observations on the combined twenty-second to twenty-fourth periodic reports of Poland, 24 September 2019, available at: <https://bit.ly/2t8Vt7c>

<sup>5</sup>The Voivode is the regional representative of the central government appointed by the Prime Minister.

As the new system of AMIF distribution is currently being discussed, we propose the following to support the position of the civil society in the process and make the system more immune to political instability:

- 1) To secure a specific percentage of AMIF funds to finance the activities of civil society organizations - we would suggest a minimum of 30 %.
- 2) To consider establishment of a non-government body to distribute (or partly distribute) national allocations, instead of leaving the management of the entire allocation to government bodies (distribution of EEA and Norway funds could serve as a good practice in this case).<sup>6</sup> Direct funding to self-government authorities may be an option as well.
- 3) To strengthen the direct financing of civil society organizations' projects by the European Commission, keeping in mind that the current system is not open to smaller and young organizations, including NGOs run by migrants.
- 4) Less bureaucracy is needed for the funding to be more accessible. In case of funds redistributed by governments, NGOs are to face multiple inspections, which do not respect one another's findings. For example, we have experienced a case in Poland when an organization implemented a project, went successfully through an audit at the local level, to face another audit a few years later. During the second audit the results of the first one were questioned and the organization was requested to refund a significant portion of spent funds. The risk of having a project disapproved a few years after it was completed is also stopping smaller organizations from benefitting from this form of funding, as they have no resources or enter into discussions/legal disputes to protect themselves.
- 5) To encourage systematic distribution of funds within the financial framework.
- 6) To encourage real partnership-based dialogue with civil society organizations, including drafting of national programmes - recommending introduction of principles for this dialogue, the consultative body, and the consultation mechanism; to consider remuneration for consultation work, including resources for legal consultations for the civil society's side.
- 7) To recommend securing funds for research and capacity-building projects.
- 8) To introduce fair provisions of financial agreements that would also secure the needs and rights of entities implementing projects. The constant uncertainty about the status of already audited and approved documentation has a destabilizing and demotivating effect on starting new initiatives. It is worth mentioning that in an environment unwelcoming to migrants, bureaucratic requirements are overtaking standard EC requirements.
- 9) To enable AMIF to be considered as a financial contribution to other projects funded from other sources. This is the only way that NGOs could combine matching funds for their activities (requested as well in AMIF grants).
- 10) To encourage governments to provide matching funding to projects co-financed by AMIF.
- 11) To reconsider the limits of indirect costs for partnership projects. The logic of diminishing indirect costs as projects grow is harmful in case of projects run by partnerships.

We hope that the European Commission will be open to our voice. While the functioning of AMIF in Poland in the recent years has been for many of us a difficult experience, we trust it is an important lesson learned. We would like the European Commission to draw conclusions from the Polish example and use our experience to develop a new perspective that will be more immune to political factors.

---

<sup>6</sup> EEA and Norway Grants: Fund Operator selected in Poland, available at: <https://www.norway.no/pl/poland/norwegia-polsce/aktualnoci-wydarzenia/aktualnoci/acf-selection/>

We are open to further discussions with you and express our willingness to be an active partner in the process of creating financial mechanisms for the facilitation of migration and integration in the EU under for the next financial perspective.

Sincerely,



Agnieszka Kosowicz  
President of the Board  
Polish Migration Forum Foundation

POLSKIE FORUM MIGRACYJNE  
FUNDACJA  
ul. Orła Białego 44 A, 05-080 Izabelin  
tel. 605 888 753, NIP 1181879509  
Regon 140851979, KRS 0000272075

**On behalf of:**

"Our Choice" Foundation  
Association for Legal Intervention  
Helsinki Foundation for Human Rights  
Homo Faber Foundation  
Institute of Public Affairs Foundation  
Migration Studies Centre  
Nomada Foundation  
Ocalenie Foundation  
Polish Hospitality Foundation  
Polish Migration Forum Foundation

**Cc:**

Dr Marek Prawda  
Director  
Representation of the European Commission in Warsaw  
Jasna 14/16A,  
00-041 Warszawa  
Poland