

***PRIAE*** *Policy Research Institute on Ageing & Ethnicity*

Registered Charity no. 1081930

Registered Company no. 3898974

[www.priae.org](http://www.priae.org)

Chair: Lord Herman Ouseley Vice Chair: Lord Dholakia OBE Director: Professor Naina Patel OBE

**PRIAE POLICY RESPONSE  
to OPINION of the European  
Economic and Social Committee  
on  
'The representativeness of  
European civil society  
organisations in civil dialogue'**

**Submitted to the European  
Economic and Social Committee**

**July 2006**



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**PRIAE Response to OPINION of the European Economic and Social Committee on '*The representativeness of European civil society organisations in civil dialogue*'**

**Executive Summary**

**Introduction**

PRIAE is the leading organisation specialising in ageing and ethnicity in the UK and across Europe. Established as an independent charitable institute in 1998, PRIAE seeks to improve health, social care, housing, income and pensions, and employment and quality of life for current and future generations of black and minority ethnic (BME) elders at the national and European level. For this submission we use in most cases the term 'minority elders' to refer to those who have worked, lived, aged and are ageing in Europe due to being a traditional/national minority; as a result of economic migration within the Union; as a result of colonial connection and/or refugee background.

PRIAE is itself an international NGO set up to support grassroots minority age organisations in the civil sector, acting as an 'umbrella organisation'. The Institute therefore works with minority elders and age organisations, with clinical and non-clinical professionals

and researchers, across sectors to influence, inform, develop and strengthen the knowledge base, capacity and practice in ageing and ethnicity. PRIAE welcomes the opportunity to respond to the OPINION of the European Economic and Social Committee on '*The representativeness of European civil society organisations in civil dialogue*'.

PRIAE is recognised as having helped to increase awareness of policymakers on the combined effects of age and ethnicity. Claude Moraes MEP states 'PRIAE is the only body I know that looks at multiple discrimination brought about by age and ethnicity'. Stephen Hughes MEP regards PRIAE's work as a 'wake up call' for policymakers' (**MEC minority elderly care** launch, 2004). PRIAE carried out the largest European research into health and social care of 26 ethnic groups in ten countries where 300 civil society organisations supplying age services were researched – a first of its kind research and provides European societies with important insights. The research award was given by DG Research at the EC – a first such grant to a civil society organisation in the area. The results were launched at the European Parliament ([www.priae.org](http://www.priae.org)).

In the UK, PRIAE recently launched the **Ethnic Elders' Policy Network** in April 2006. This National Policy Network, funded by the UK's Big Lottery Fund, will develop an information link between BME elders, BME age organisations, mainstream age organisations and policy-makers. The Ethnic Elders' Policy Network aims to empower BME elders and age organisations and will work to normalise BME elders' issues in the mainstream policy-making process. Since the Network was established Regional Advisory Groups have been created to cover the North and South of England. In preparing this submission, Regional Advisory Group Members composed of elders and managers with expertise on civil society

were asked by PRIAE to comment on the OPINION of the European Economic and Social Committee on '*The representativeness of European civil society organisations in civil dialogue*'.

This submission also builds on previous PRIAE responses to EC Green Papers and PRIAE's contribution to the European Council meeting 23/24 March 2006: *Leadership needed for a more social Europe – What will be the UK contribution?*

This submission also draws on PRIAE's Minority Elderly Care (MEC) project and PRIAE's 1999 report to the Royal Commission on Long-Term Care for the Elderly. The MEC project was designed and undertaken as a serious attempt to contribute to a health and social policy agenda relevant to the growth of the minority elderly population across Europe. Empirical research was undertaken as part of the EC Fifth Framework Research Programme. Research was conducted in 10 countries: Bosnia-Herzegovina, Croatia, Finland, France, Germany, Hungary, the Netherlands, Spain, Switzerland and the UK. This research is highlighted for it is the largest research project in the area of ageing and ethnicity in the UK and across Europe, and a first for the European Commission in its 24 years of research framework funding.

During this response unless otherwise stated the examples mentioned and recommendations refer to policy in the UK.

## **Summary of Recommendations**

The European Economic and Social Committee (EESS), in its OPINION on '*The representativeness of European civil society organisations in civil dialogue*', argues that, in order to considered

representative, and participate effectively in the process of shaping policies and preparing Community decisions, a European organisation must meet nine criteria. The second criterion is 'provide direct access to expertise' and the third criterion is 'represent general concerns that tally with the interests of European society'.

PRIAE would ask the EESC to provide further information on the following definitions:

- ✦ Regarding the second criterion, what does the EESC classify as 'expertise'? PRIAE would emphasise that the full diversity of cultural and religious perspectives need to be taken into account by policy-makers in order to develop policies which are socially and culturally appropriate. Cultural and 'local knowledge', to adopt an anthropological term, need to be given as much consideration by policy-makers as 'scientific/expert' knowledge. Many BME organisations in civil society are effectively experts in the areas of their 'business' bringing perspectives of different cultural and religious groups; **PRIAE would therefore ask: would such organisations be considered to provide 'direct access to expertise' by the EESC?**
  
- ✦ Regarding the third criterion, what does the EESC consider to be 'general concerns' and how would the EESC propose to assess the 'interests of European society'. PRIAE has developed an expertise in the diversity of European society since it was established in 1998. It would be extremely difficult for European policy-making institutions to define 'general concerns' and 'interests of European society' at any given historical moment, given the diversity of contemporary

European society, and the current pace of social and political change. A preliminary reading of the opinion could arguably give civil society organisations representing minority social groups cause for concern that the concerns of such minority groups would not be considered to constitute 'general concerns'. PRIAE asserts that the interests of minority ethnic groups in European societies must be considered a 'general concern' given the enormous contribution minority ethnic groups make to European society and economy as citizens, as workers, as consumers. **The interests of minority ethnic groups, including minority elders, which PRIAE works most closely with, are therefore one of the interests of European society, and PRIAE would ask the EESC to acknowledge this fact when defining its nine criteria of representativeness outlined above.**

- ✦ Mr M A Khan Lodhi, Chair of the South Region Advisory Group for the Ethnic Elders' Policy Network, has also argued that **there needs to be a clause to ensure that the criteria can be reviewed through democratic processes, in recognition of the fact that the European Union is in a state of development.**

Regarding the three assessment criteria outlined by the EESC for assessing representation -

1. The provisions in the organisation's statute and their implementation
2. The organisation's support base in the Member States
3. Qualitative criteria

- ✦ PRIAE would ask the EESC to confirm whether it considers a European statute of transnational associations a necessary requirement prior to the implementation of its representativeness criteria for participation? In addition, how would the registration process work in practice? Would the interests of grass-roots community organisations be served by the creation of such a statute? **PRIAE considers it vital to ensure that that any such legislative change does not work to exclude from the policy-making process smaller organisations with a legitimate interest in European affairs.** PRIAE is such a case in point: it has helped to establish the area of ageing and ethnicity, and given its funding it cannot have many branches across Europe (unless the Parliament and/or EC funds it) and yet through its own efforts with support from committed individuals and organisations it has become a 'European' NGO.
- ✦ It will be necessary to ensure that civil society organisations receive adequate funding in order to implement appropriate mechanisms and procedures to ensure that the statute is monitored and implemented as part of the organisation's internal democratic decision-making process.
- ✦ PRIAE would argue that if a European organisation must be represented in more than half of EU Member States to be considered representative, every effort must be made to support and engage NGO umbrella organisations with strong links to grass root organisations which carry trust and legitimacy. See point above on PRIAE where its funding prohibits multiple branches in member states and yet is a significant organisation that policymakers and civil society organisations rely upon. Significant organisations like PRIAE who are European in content

and operation but cannot through its lack of funding support be in 'more than half of EU Member States' will be ruled out of the participatory process. This assessment criterion may also discriminate against particular ethnic groups that are not represented in more than half of EU Member States, as Mr M A Khan Lodhi, Chair of the South Region Advisory Group for the Ethnic Elders' Policy Network, has noted. This does not bode well with the principle of addressing socio-economic disadvantage and discrimination well recognised by the Committee and EC's goals of social inclusion and cohesion. Without such a measure the wealth of knowledge and expertise at the grass roots level will be lost in European policy framing, leading to policies which are not community focused and culturally sensitive. The lack of community focus and cultural sensitivity in policy-making was in fact one the reasons why PRIAE established the Ethnic Elders' Policy Network in April 2006. **Since it was established in 1998, PRIAE has endeavoured to help 'micro' community organisations engage effectively with more established civil society organisations, in order to help raise aspirations within the voluntary and community sector. PRIAE argues that this principle should underpin the development of European public policy.**

- ✦ PRIAE notes the fact that the representativeness criteria themselves do not relate to (1) 'consultation'; (2) the daily dialogue at sector level between civil society organisations and between such bodies and their interlocutors within the EU's legislature and executive, particularly the Commission; and (3) European social dialogue and European social partner organisations, whose representativeness is established clearly on the basis of criteria specific to these organisations. **PRIAE**



would argue that although *participation is qualitatively different to consultation etc.*, consultation should continue to inform policy development, particularly where the actors contributing to European consultations are smaller civil society organisations not eligible to *participate* in the process of shaping policies and preparing Community decisions according to the criteria outlined in the **OPINION of the EESC.**

- ✦ PRIAE strongly asserts that European civil society organisations need financial support in order to operate effectively, which includes representing citizens' interests in dealings with European institutions and organised civil society. Due to short term funding arrangements, many civil society organisations are unable to build on or sustain connections with European institutions and organised civil society. **PRIAE would emphasise the fact that the proposals of the EESC in its OPINION on 'The representativeness of European Civil Society organisations in civil dialogue' need to be underpinned by sufficient and sustained funding for European civil society organisations, particularly those from minority ethnic organisations who are often overlooked, reflecting the reality that 'in age race is blind; in race, age is blind'.**

**PRIAE Response to OPINION of the European Economic and  
Social Committee on '*The representativeness of European  
civil society organisations in civil dialogue*'**

**Introduction**

PRIAE welcomes the following statements made in the OPINION of the European Economic and Social Committee (EESC) which acknowledge the important role played by European civil society:

1. The experience and expertise of civil society players, the dialogue between them and with public authorities and institutions, at all levels, combined with negotiation and the quest for that convergence or even consensus, enable proposals to be made in the general interest. This enhances the quality and credibility of political decision-making, which becomes easier for the public to grasp and accept.
2. By giving citizens the chance to engage individually and collectively in managing public affairs via a specific contribution from organised civil society, participatory democracy enhances representative democracy, thus strengthening the democratic legitimacy of the European Union.
3. The "right to participate", which has been claimed by civil society and organisations active at European level for a long time, but is now of particular relevance. The issues and challenges facing the European Union are such that they require the mobilisation of all those on the group and their representatives.

4. This need was recognised by the European Council, among others, at its meeting in Lisbon on 23 and 24 March 2000 in connection with the implementation of the Lisbon Strategy and was highlighted by it once again at its meeting on 22 and 23 March 2005, in connection with the re-launch of this Strategy.

PRIAE itself contributed to the 2006 European Council meeting *Leadership needed for a more social Europe – What will be the UK contribution?*, which took place on 23/24 March 2006. PRIAE sent the letter shown in Appendix 1 to the UK Prime Minister, Chancellor of the Exchequer, and Minister for Europe. PRIAE stated that the persistent lack of consultation and involvement of civil society in European Affairs is one of the key issues that most worries social NGOs, and PRIAE advocated action to actively involve civil society organisations in the national reform programmes.

PRIAE also argued in its response to the European Commission Green Paper *'Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases'*:

'Policies must recognise the major contribution of the civil society and key NGOs working in developing bespoke services to its users and consequently develop effective working partnerships with them' (PRIAE, 2006a).

PRIAE's European Research Minority Elderly Care funded by EC DG Research under the EC Fifth Framework Research show that civil society organisations coming from ethnic minority backgrounds are 'critical' providers of care and support as well as being often the sole support when mainstream services fail communities with

different culture and language. Their funding base is however short term and experience poor infrastructure. They are brought together by PRIAE and its focus on policy in specific areas is to build up necessary investment in the age and ethnicity area nationally and across Europe, which it has been doing through its own efforts since 1998. Large 'age' organisations rely on PRIAE's expertise to supply ethnicity specific to age issues.

PRIAE therefore agrees with the EESC that civil society players should have the right to participate effectively in the process of shaping policies and preparing Community decisions. The question PRIAE focuses on in this response is the extent to which 'small' European umbrella organisations like PRIAE are supported to participate in decision-making processes and policy-making at the European level.

### **PRIAE response to specific recommendations**

The OPINION of the EESC states that only clearly established representativeness can give civil society players the right to participate effectively in the process of shaping policies and preparing Community decisions.

With this in mind, the OPINION goes on to state, the Committee has worked out representativeness criteria, which it set out most recently in its opinion of 20 March 2002 on the White Paper on European governance. In order to be considered representative, a European organisation must meet nine criteria. It should:

1. Exist permanently at Community level
2. Provide direct access to expertise

3. Represent general concerns that tally with the interests of European society
4. Comprise bodies that are recognised at Member State level as representative of particular interests
5. Have member organisations in most of the EU Member States
6. Provide for accountability of its members
7. Have authority to represent and act at European level
8. Be independent, not bound by instructions from outside bodies
9. Be transparent, especially financially and in its decision-making structures

PRIAE would ask the EESC to provide further information on the following definitions:

- Regarding point 2 above, what does the EESC classify as 'expertise'? PRIAE would emphasise that the full diversity of cultural and religious perspectives need to be taken into account by policy-makers in order to develop policies which are socially and culturally appropriate. Cultural and 'local knowledge', to adopt an anthropological term, need to be given as much consideration by policy-makers as 'scientific/expert' knowledge. Many minority organisations in civil society as well as umbrella organisations like PRIAE are effectively experts on the area of their 'business' such as age and ethnicity, bringing perspectives of different cultural and religious groups; PRIAE would therefore ask: would such organisations be considered to provide 'direct access to expertise' by the EESC?
- Regarding point 3, what does the EESC consider to be 'general concerns' and how would the EESC propose to assess

the 'interests of European society'. PRIAE has developed an expertise in the diversity of European society since it was established in 1998. It would be extremely difficult for European policy-making institutions to define 'general concerns' and 'interests of European society' at any given historical moment, given the diversity of contemporary European society, and the current pace of social and political change. A preliminary reading of the opinion could arguably give civil society organisations representing minority social groups cause for concern that the concerns of such minority groups would not be considered to constitute 'general concerns'. PRIAE would argue that the interests of minority ethnic groups (and other minority groups) in European societies must be considered a 'general concern' given the enormous contribution minority ethnic groups make to European society and economy. The interests of minority ethnic groups, including minority elders, which PRIAE works most closely with, are therefore one of the interests of European society, and PRIAE would ask the EESC to acknowledge this fact when defining its nine criteria of representativeness outlined above.

In addition to giving further consideration to the nine criteria specified, Mr M A Khan Lodhi, Chair of the South Region Advisory Group for the Ethnic Elders' Policy Network, has also argued that there needs to be a clause to ensure that the criteria can be reviewed through democratic processes, in recognition of the fact that the European Union is in a state of development.

The EESC acknowledges in its OPINION that there are pros and cons to the establishment of a system for accrediting civil society organisations to the European institutions.

PRIAE would consider some of the pros and cons to be as follows:

- **PRO:** Representativeness criteria may help to guarantee the right of civil society organisations to participate effectively in the process of shaping policies and preparing Community decisions.
- **CON:** Representative criteria which do not provide adequate recognition of the full diversity of European civil society organisations however may work to exclude organisations capable of making an effective contribution to policy-development.
- **CON:** Representative criteria need to recognise the diversity of European civil society organisations, but also avoid excessive complexity, in order to ensure that the procedure for assessing representation is both efficient and effective.

The OPINIOIN of the EESC states that the procedure to assess representation should be based on the following principles:

- Openness
- Objectivity
- Non-discrimination
- Verifiability
- Participation (by European organisations)

The EESC suggests that the procedure to assess representation should cover the following three assessment criteria:

1. The provisions in the organisation's statute and their implementation
2. The organisation's support base in the Member States
3. Qualitative criteria

## The statute and its implementation

The EESC states that the Statute for a European Organisation should contain the following provisions:

- On the association's areas of activity and purpose
- On membership criteria
- On the operating procedures, which must be democratic, transparent, and include the accountability of the Board vis-à-vis its member organisations
- The financial obligations of the member organisations
- That an economic audit and an activity report must be submitted annually and be available to the public

Consequently, the OPINON goes on to state: 'the EESC reiterates its call to set up a European statute of transnational associations, by analogy with the statute of European political parties that came into force in November 2003'.

PRIAE would ask the EESC to confirm whether it considers a European statute of transnational associations a necessary requirement prior to the implementation of its representativeness criteria for participation? In addition, how would the registration process work in practice? Would the interests of grass-roots community organisations be served by the creation of such a statute? PRIAE considers it vital to ensure that that any such legislative change does not work to exclude from the policy-making process smaller organisations with a legitimate interest in European affairs.

Although the OPINION advocates the creation of a European statute of transnational associations, it also argues that:



'Nonetheless, member organisations should be responsible for ensuring, through appropriate mechanisms and procedures, that the statute is monitored and implemented as part of the organisation's internal democratic decision-making process'.

Many civil society organisations operate in a context of limited and short-term funding. PRIAE has made the following recommendations relating to funding of civil society organisations:

- 'BEM elder care centres should...be strengthened, expanded to meet growing demands and regarded as primary providers of care rather than as an alternative to the mainstream. Commissioning and Funding bodies need to seriously examine their knowledge base and act in a non-stereotypical way in support of this' (Patel, 1999: 259 – *PRIAE's report to the Royal Commission on Long Term Care*).
- 'Policymakers need to recognise that minority ethnic organisations are essentially acting as primary providers of dementia care in the absence of mainstream services. This should be reflected in future funding arrangements, as they currently suffer from scarce and short term resources.' (PRIAE, 2006b: 7 – *PRIAE's response to the European Commission Green Paper 'Improving the mental health of population: Towards a strategy on mental health for the European Union* (drawing on PRIAE's project the Care Needs of Ethnic Older People Suffering from Alzheimer's (CNEOPSA)).
- 'There is a need for more funding and for strengthening of the infrastructure of the ME voluntary sector. Adopt a capacity building approach to increase service provision' (Patel, 2004:

*13 – Minority Elderly Health and Social Care in Europe: A Research Briefing).*

It will be necessary to ensure that civil society organisations receive adequate funding in order to implement appropriate mechanisms and procedures to ensure that the statute is monitored and implemented as part of the organisation's internal democratic decision-making process.

The organisations' support base in the Member States

According to the EESC:

The criteria proposed by the EESC suggest that a European organisation must have member organisations in the vast majority of Member States and that they should be recognised as being representative of the interests they represent.

In order to apply this criterion the EESC considers that, if a European organisation is to be considered representative, it must be represented in more than half of EU Member States.

In order to allow for the appraisal of this support base, every European organisation should systematically make public its list of member organisations, whether they are organisations (legal persons) that are independent of outside interests representing civil society in the Member States and/or European associations of such organisations.

PRIAE argues, in its response to the European Commission Green Paper 'Promoting healthy diets and physical activity: a European

dimension for the prevention of overweight, obesity and chronic diseases':

'EU platforms should include NGO umbrella organisations from minority ethnic base with strong links to grass roots organisations. Currently the 'one size fits all' approach cannot work in diverse European societies' (PRIAE, 2006a: 6).

PRIAE would argue that if a European organisation must be represented in more than half of EU Member States to be considered representative, every effort must be made to support and engage NGO umbrella organisations with strong links to grass roots organisations. Significant organisations like PRIAE who are European in content and operation but cannot through its lack of funding support be in 'more than half of EU Member States' will be ruled out of the participatory process. This does not bode well with the principle of addressing socio-economic disadvantage and discrimination well recognised by the committee and EC's goals of social inclusion and cohesion. Without such a measure the wealth of knowledge and expertise at the grass roots level will be lost in European policy framing, leading to policies which are not community focused and culturally sensitive. The lack of community focus and cultural sensitivity in policy-making was in fact one the reasons why PRIAE established the Ethnic Elders' Policy Network in April 2006. Since it was established in 1998, PRIAE has endeavoured to help 'micro' community organisations engage effectively with more established civil society organisations, in order to help raise aspirations within the voluntary and community sector. PRIAE argues that this principle should underpin the development of European public policy.

Mr M A Khan Lodhi, Chair of the South Region Advisory Group for the Ethnic Elders' Policy Network, has also noted that the criteria proposed by the EESC on the organisations' support base in the Member States could be discriminatory toward particular ethnic groups. For example, some ethnic groups are small in number or concentrated in particular counties, and the organisations that represent their interests may not therefore be represented in more than half the EU Member States. Mr Lodhi has therefore stated:

'This clause is unfavorable and discriminatory'.

Mr Lodhi has also highlighted the fact that as new counties join the European Union there may be ethnic minority groups within those counties hitherto unrepresented at the European level, and would continue to be unrepresented in European policy framing by the proposed EESC criteria on Member State support base.

PRIAE notes the fact that the representativeness criteria themselves do not relate to (1) 'consultation'; (2) the daily dialogue at sector level between civil society organisations and between such bodies and their interlocutors within the EU's legislature and executive, particularly the Commission; and (3) European social dialogue and European social partner organisations, whose representativeness is established clearly on the basis of criteria specific to these organisations. PRIAE would argue that although *participation* is *qualitatively* different to consultation etc., consultation should continue to inform policy development, particularly where the actors contributing to European consultations are smaller civil society organisations not eligible to *participate* in the process of shaping policies and preparing Community decisions according to the criteria outlined in the OPINION of the EESC.

Mr M A Khan Lodhi, Chair of the South Region Advisory Group for the Ethnic Elders' Policy Network, has also argued that, in addition to considering representation in the Member States, the EESC should also promote dialogue between European Member States and Third World countries, in order that we can learn from and support each other on important global issues:

'There is a need to recognise and establish a framework for dialogue with the Third World. We live in an age of interdependence on one another in a fast changing environment'.

#### Qualitative criteria

According to the EESC:

Qualitative criteria...refer to an organisation's experience and ability to represent citizens' interests in its dealings with the European institutions, and the confidence and reputation it enjoys with these institutions on the one hand, and with other sections of European organised civil society on the other.

Consequently, a European organisation's ability to contribute must be assessed, based on its qualitative representativeness, in light of the extent to which the organisation can demonstrate, through its activity, its level of involvement in consultative processes implemented by the European institutions.

It is essential, here, that the European organisations concerned should openly present their activity reports and other relevant information. "Benchmarks" could also be used, as is the case in academic and research fields; these would need to be defined in cooperation with European civil society organisations.

PRIAE would argue that the EESC should consider the effect the above qualitative criteria could have on newly established civil society organisations, which may be able to contribute effectively to European policy development. As Mr M A Khan, Chair of the South Region Advisory Group for the Ethnic Elders' Policy Network, puts it:

'This gives the impression that the door is effectively closed to would be new organisations who are working to establish credentials'.

PRIAE would also argue that European civil society organisations need financial support in order to operate effectively, which includes representing citizens' interests in dealings with European institutions and organised civil society. Due to short term funding arrangements, many civil society organisations are unable to build on or sustain connections with European institutions and organised civil society. PRIAE would emphasise the fact that the proposals of the EESC in its OPINION on '*The representativeness of European Civil Society organisations in civil dialogue*' need to be underpinned by sufficient and sustained funding for European civil society organisations, including specialist European NGOs such as PRIAE.

**APPENDIX 1: PRIAE letter sent to the Prime Minister,  
Chancellor of the Exchequer, and Minister for Europe**

15<sup>th</sup> March 2006

Dear Rt Hon Prime Minister Tony Blair MP

**Re: European Council meeting 23/24 March 2006:  
Leadership needed for a more social Europe - What will be  
the UK contribution?**

As an independent European charitable Institute working with black and minority ethnic elders (from pensions, employment to health, housing and social care) we are following with particular attention policy initiatives at the EU level. PRIAE Policy Research Institute on Ageing and Ethnicity has undertaken much research and development work across Europe, launched by MEPs Claude Moraes and Stephen Hughes in supporting our 'wake up call' on ethnicity and ageing, while we remain appreciative of such important efforts, we want to express our concerns together with European bodies like AGE and ENAR on recent EU developments and to call on you to take actions.

What worries Social NGOs:

- The **lack of social dimension in the National Reform programmes** and in the four priorities identified by the Commission;
- The **proposal to allocate 80% of the structural funds to "growth and jobs"** at the expenses of other treaty objectives including social objectives;
- The **Services directive** and the urgent need for the EU to find a better balance between social objectives and internal market freedoms;
- The persistent **lack of consultation and involvement of civil society** in European Affairs.

What we expect from you during the European Council:

- To make clear that **economic and internal market objectives of the EU cannot be pursued at the costs of social objectives and social legislation;**
- Considering the various level of competences (strong EU competences in economic and internal market affairs while social affairs remain mainly national) to **reflect concretely**

**on what would be the best instrument to ensure a balanced approach at the EU level;**

- To make sure that the EU addresses its real priorities which must include **how to stop a race to the bottom on social standards and fiscal policies?** How to move from competition to coordination in the social field? How to join forces at the international level and shape globalisation instead of sustaining its negative impact? How to address persisting inequalities, discrimination and exclusion to achieve more social cohesion and integration in EU Member States?
- To take on board the European Parliament's vote of 16<sup>th</sup> February on the Services Directive and **support the exemption of social services from the scope of the directive.** To call on the Commission to publish without delay the long-awaited **Communication on social and health services of general interest**, which will advance the EU's understanding of the social services sector in Europe and help clarify how social services should be dealt with in EU rules.
- To adopt an action plan to **actively involve civil society organisations in the national reform programmes** and to propose that **the situation of the most disadvantaged and vulnerable groups in society be used to measure the overall impact and success of the "growth and jobs" strategy.**

We hope for your support on these issues. In order to promote the democracy at the European level we also believe that the discussions during the European Council should be public.

Yours sincerely,

Professor Naina Patel OBE

**Director of PRIAE; Professor in Ageing & Ethnicity @ Centre for Ethnicity & Health, UCLan; UK member to the European Monitoring Centre on Racism (EUMC); EUMC observer to ECRI, Council of Europe; Member on Leadership & Race Equality NHS Panel**

**ENDS/PRIAE - EESC on civil society orgs. consultation, July 2006**



## References

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2. Patel, N. (ed.) (2004) *Minority Elderly Health and Social Care in Europe: A Research Briefing*, MEC Research for the EC 5<sup>th</sup> Framework Research Programme, PRIAE, downloadable at [www.priae.org](http://www.priae.org)
3. PRIAE (2006a) PRIAE response to European Commission Green Paper 'Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases', PRIAE downloadable at [www.priae.org](http://www.priae.org)
4. PRIAE (2006b) PRIAE response to the European Commission Green Paper 'Improving the mental health of population: Towards a strategy on mental health for the European Union', PRIAE downloadable at [www.priae.org](http://www.priae.org)

See [www.priae.org](http://www.priae.org) for Ethnic Elders' Policy Network and its work with civil society organisations and elders in

- income, employment and pensions;
- health, social care and housing;
- citizenship and quality of life.

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