



PICUM's priorities for the next EU long-term budget

Contribution to the European Commission
consultation

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The Platform for International Cooperation on Undocumented Migrants (PICUM) was founded in 2001 as an initiative of grassroots organisations. Now representing a network of 158 organisations working with and for undocumented migrants in 32 countries, PICUM has built a comprehensive evidence base regarding the gap between international human rights law and the policies and practices existing at national and EU levels. With more than twenty years of evidence, experience and expertise on issues affecting undocumented migrants, PICUM promotes recognition of their fundamental rights, providing an essential link between local realities and the debates at the policy level.

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PICUM's publications on EU funding can be found at: <https://picum.org/our-publications/?categories=eu-funding>.

Introduction

In mid-2025, the European Commission [will propose](#) a new EU budget for the next seven years beyond 2027, the Multiannual Financial Framework (MFF). The MFF will define EU investment priorities across various policy areas, including social inclusion, access to essential services, social protection, and migration. The way in which the EU allocates and uses funds will be key in shaping responses to persistent challenges such as poverty, inequality, and social exclusion, as well as determining how the EU supports vulnerable groups, including migrants, in the coming years.

In this document, **PICUM calls for the next EU budget to prioritise investments in social inclusion and equal access to services, particularly for groups**

who are systematically excluded from support, such as undocumented migrants. We emphasise the need for EU funds to reflect the lived realities of those most at risk of poverty and marginalisation, and we call for funding approaches that do not discriminate on the basis of migration status.

The next MFF also presents an opportunity to better align funding with the EU's commitment to fundamental rights and social cohesion. This document outlines our key priorities and recommendations to ensure that the EU budget for the 2028–2034 period reflects a genuine commitment to inclusive, non-discriminatory, and rights-based policies, where no one, regardless of their migration status, is left behind.

For further information, please refer to the position papers prepared by the following alliances and networks – of which PICUM is a member and to which it has actively contributed:

- Social Platform, [A post-2027 Multiannual Financial Framework for Social Europe](#), March 2025.
- EU Alliance for investing in children, [A Europe that protects every child: Aligning EU's policies and budget to eradicate child poverty](#), April 2025.
- European Anti-Poverty Network, [Towards the eradication of poverty](#), April 2025.

Key priorities and recommendations

The following list outlines key priorities for the next EU budget, with a focus on promoting social inclusion and equitable access to services. It highlights areas where investments are particularly needed to address the exclusion of marginalised groups, such

as undocumented migrants. The priorities reflect the importance of ensuring that EU funding programmes are responsive to the lived realities of those most at risk of poverty and marginalisation, and that they remain inclusive regardless of migration status.

Priority 1. Social inclusion and anti-poverty must remain central to cohesion policy

Key recommendations

- The next ESF+ must remain a standalone instrument with a clear and strong thematic concentration on social inclusion. Earmarking for social inclusion and measures addressing material deprivation in the next ESF+ should be increased to at least 30 % for social inclusion and 4 % for measures addressing material deprivation (currently at 25 % and 3 % respectively).
- The next EU budget must ensure targeted resources reach groups most at risk of marginalisation and social exclusion, including migrants with precarious or irregular status.

defence and competitiveness should not come at the expense of social policies and programmes that support our social fabric and, in particular, groups in vulnerable situations. Adequate social investments are at the core of thriving societies. This investment is only feasible if the overall budget is increased, and social spending is fully supported and further expanded.

The ESF+ should continue as a standalone programme, with a strong and well-resourced thematic focus on social inclusion. Earmarking for social inclusion within the ESF+ must be preserved - and expanded - beyond the current 25 % for social inclusion and 3 % for material deprivation. As previously [recommended](#), PICUM recommends that the next ESF+ allocates at least 30 % for social inclusion and 4 % for material deprivation.

Finally, the EU budget must include the necessary tools - such as dedicated emergency funds - to respond to unforeseen challenges, such as increased social exclusion or poverty as a result of global pandemics, conflicts and inflation. It is particularly important to ensure that efforts to increase the flexibility of EU funds do not come at the expense of long-term, essential investments, such as the social inclusion component of cohesion funding.

The use of EU funding, especially through the European Social Fund+ (ESF+), has been crucial in supporting social inclusion, anti-discrimination and anti-poverty measures in the period 2021-2027.

Building on this experience, the EU budget must further strengthen its efforts to reduce poverty and inequality, ensuring that social investments effectively target groups most at risk of vulnerability and social exclusion, including migrants with precarious or irregular status.

As [recommended](#) by the Social Platform, the size of the next MFF must be larger than the current MFF and Next Generation EU together, therefore, it should be above 2 trillion euros. Increased investments in

Priority 2. Support must be based on needs, nothing else

Key recommendations

- Access to essential services (e.g. education, employment support, health and psychological care, accommodation, and material support) should not depend on a person's residence or migration status.
- Financial reporting requirements for service providers benefitting from EU funds should not include questions about or proof of residence status.
- A mainstreamed approach to migrant inclusion should be adopted, ensuring access to housing, employment, education, and social services on an equal basis with others.
- Targeted funding programmes, such as the inclusion strand of AMIF, should continue to exist to address specific needs through tailored measures (e.g. language learning, legal counselling, and labour market access).

To promote genuine social cohesion, inclusion policies and funding must respond to people's needs, not their residence or migration status. The next MFF presents a crucial opportunity to ensure that social investments reach the most marginalised groups - including those often excluded from support despite facing high levels of vulnerability.

Migrants with undocumented or precarious status face structural barriers and systemic discrimination when accessing services, even those funded by the EU. Although the ESF+ [does not](#) explicitly exclude undocumented migrants, national-level reporting requirements often prevent access in practice. For example, beneficiary organisations may be required to provide a social security number for service users — something undocumented migrants may not have.

At the same time, AMIF – the only EU fund specifically focused on migrant inclusion – typically conditions access on regular status, rather than individual needs. This excludes people with irregular or precarious status from the support provided by AMIF-funded projects, even when they cannot be returned or are likely to regularise their status over time.

Status-based approaches are short-sighted, inefficient, and undermine successful integration. Denying services to people who may later gain regular status delays inclusion and increases long-term costs. For this reason, financial reporting requirements for the beneficiaries of EU funds for actions delivering education and employment services, health and psychological assistance, accommodation and food or material support for the most deprived, but also guidance and counselling in professional issues and legal advice, should never include questions about or proof of migration status.

By adopting a needs-based and non-discriminatory funding model, the EU can build more inclusive, cohesive societies where no one is left behind.

Priority 3. Maintain a bottom-up approach in cohesion policy and strengthen the partnership principle at the heart of the next MFF

Key recommendations

- Protect and strengthen local and civil society involvement in EU funding (especially those covered by the Common Provisions Regulation) by ensuring they are meaningfully included in planning, implementation and monitoring.
- Keep funding decisions close to the ground by avoiding centralisation at national level and by ensuring that regional/local actors and CSOs have a say on funding decisions.
- Mainstream the partnership principle across all EU funds, including those managed directly by the European Commission (such as the AMIF and BMVI Thematic Facilities), and ensure participation is fairly supported with dedicated resources — so smaller organisations, including those that are migrant-led, can take part on equal footing.

The partnership principle is a cornerstone of the Common Provisions Regulation, guiding the implementation of key funds under shared management, such as the ESF+, AMIF, and Border Management and Visa Instrument (BMVI). This principle means that governments must work in close collaboration with local authorities, civil society, social partners, and other relevant stakeholders throughout the entire funding process — from planning to implementation and monitoring. It ensures that the people and organisations directly affected by EU-funded projects have a say in how those funds are used, making the process more transparent, effective, and responsive to real needs.

This principle has been shaped by years of experience with structural funds. Based on that experience, this principle must be strengthened, not weakened, in the next MFF. The [European Code of Conduct on Partnership](#) — which has guided the implementation of this principle since 2014 — should continue to apply not only to structural funds but also to Home Affairs funds. Better involvement of stakeholders leads to

more effective, accessible funding that responds to needs on the ground. Funds traditionally managed at regional and local levels must continue to do so, ensuring that local and civil society actors play a central role.

However, the European Commission is [considering](#) shifting to a more centralised management of EU funds, with greater control at national level on cohesion funding. Such a shift would significantly weaken the partnership principle, particularly in cohesion policy and Home Affairs funding that are also bound by the partnership principle, where the active involvement of local and regional authorities — and civil society — has proven essential to making EU investments effective and responsive to real needs on the ground. This trend would risk dismantling promising participatory practices and undermine years of experience in regionalised, partnership-based, bottom-up programming.

However, even where the partnership principle is formally recognised, it is not always put into practice. Civil society organisations often face [barriers to participation](#) in programme design, implementation, and monitoring — especially at national level. In many cases, they lack [voting rights](#) in monitoring committees (notably in the BMVI monitoring committees) or struggle with limited resources and administrative burdens that hinder their involvement.

Furthermore, the partnership principle only applies to funding managed under “shared management”, where national or regional authorities are in charge of the implementation of the funds, and the Commission oversees compliance with EU rules. However, funds directly managed by the European Commission, such as the AMIF and BMVI Thematic Facilities, would also benefit from structured consultation with civil society, including through formal consultation mechanisms.

The next MFF must take concrete steps to improve civil society access to EU funds, including for migrant-led organisations. This means applying the partnership principle to all stages — planning, monitoring, and evaluation — and ensuring that participation in monitoring and evaluation is fairly compensated and supported with dedicated funding. This inclusive approach was already backed by the [European Parliament](#) in 2019.

Priority 4. EU funding should be better aligned with social inclusion and anti-poverty policies

Key recommendations

- Embed and fund a strong EU Anti-Poverty Strategy and include specific thematic enabling conditions on national anti-poverty strategies in the next ESF+.
- Align the future ESF+ with the Action Plan on Integration and Inclusion and ensure specific thematic enabling conditions on national inclusion strategies are put in place.
- Dedicate resources to actions promoting access to labour rights for all workers, including those undocumented, such as effective complaints mechanisms and mechanisms to claim back wages.
- Invest in inclusive and equitable housing solutions, including shelters and social housing, through the next European Regional and Development Fund (ERDF) and other relevant funds.

The next MFF must more effectively contribute to reducing poverty and promoting social inclusion, especially for groups at the margins of society.

Efforts to combat poverty and social exclusion should be embedded across the MFF architecture, with the ESF+ playing a central role. A comprehensive EU Anti-Poverty Strategy must be backed by targeted funding to address growing inequalities and persistent structural barriers, with adapted solutions tailored on the specific needs of different groups experiencing poverty. Thematic enabling conditions have proven effective in guiding investments toward European Pillar of Social Rights principles and should be maintained. In particular, EU funding should be made conditional on the existence and implementation of national anti-poverty strategies, with tailored approaches for different groups experiencing poverty and exclusion (children, single parents households, people with a migrant background, undocumented people,...).

The future ESF+ should be clearly aligned with the priorities of the EU Action Plan on Integration and Inclusion, which identifies five key areas: education, labour market integration and vocational training, access to basic services, and social inclusion of third-country nationals. As highlighted in the Commission's

[Toolkit on EU funds for the integration of people with a migrant background](#), undocumented migrants are among the most vulnerable and least protected. Their meaningful access to these core areas of the Action Plan - especially education, basic services, and social support - must be ensured through inclusive access to EU funding. Similarly to other core principles, national inclusion strategies for migrants, based on the Action Plan on Integration and Inclusion, should be in place as part of thematic enabling conditions of the next ESF+.

EU funding priorities should also be dedicated to active labour market policies promoting access to decent working conditions for all workers, as well as to prevent and provide remedy for exploitation. In line with the Employers Sanctions Directive, as any other worker, undocumented workers are entitled to protection from labour exploitation, including the right to access effective labour complaints mechanisms. The next EU funding programmes should support measures countering labour exploitation regardless of the residence status of workers in parallel to measures supporting their access to rights. This includes providing concrete opportunities for member states to set up effective complaints mechanisms and ways to claim back wages that are safely accessible to all workers, including those who are undocumented, independent legal advice, and trainings for labour inspections on the rights of undocumented workers.

In parallel, the EU focus on affordable and decent housing must look at the needs of the most vulnerable individuals of our society. The new MFF should address homelessness and social exclusion affecting various groups, including undocumented migrants. To achieve this objective, EU funding initiatives should also focus on shelters and housing for all people experiencing homelessness, including undocumented migrants, particularly as this group increasingly makes up a significant portion of the homeless population in the EU. This includes equitable access to adequate housing, housing assistance, protection against forced eviction, and shelter and support services for people experiencing homelessness, without discrimination based on migration status. Moreover, the design and implementation of these funding mechanisms must actively counter structural discrimination that limits access to housing for marginalised groups. The future European Regional Development Fund (ERDF), in particular, should be leveraged to support these objectives, ensuring that EU's ongoing efforts to promote housing security are not only inclusive and equitable, but also genuinely effective.

Priority 5. Strengthen investments in the European Child Guarantee to ensure support for all children, including undocumented migrant children

Key recommendations

- Allocate a dedicated ESF+ budget of at least EUR 20 billion for the European Child Guarantee to maximise its impact on combating child poverty across Europe.
- Ensure that a minimum of 5 % of ESF+ resources are directed towards combating child poverty in all EU member states and increase this earmarking to 10 % for EU member states with a share of population at risk of poverty or social exclusion (AROPE rate) exceeding EU average.
- Ensure that member states' Child Guarantee National Action Plans address child poverty by including clear and transparent financial allocations.

Despite a [modest](#) decline in overall poverty rates in the EU since 2019, child poverty has [continued](#) to rise, with nearly 20 million children now at risk of poverty or social exclusion. This alarming trend highlights the urgent need for stronger, more targeted investments in measures that uphold children's rights and well-being in the next MFF.

The European Child Guarantee [has a strong potential](#) to make a difference for undocumented children, as children in migration, irrespective of their migration status, are one of the target groups of the Child Guarantee recommendation. However, we [have observed](#) that migrant children, especially those who are undocumented, remain underrepresented in [national plans and biennial reports](#). Many of these reports either omit or fail to include concrete projects aimed at supporting children with precarious or no status, which risks missing a vital opportunity to address the needs of those most at risk of poverty and social exclusion.

To ensure the EU lives up to its commitment of eradicating child poverty by 2030, the next MFF must prioritise the eradication of child poverty through robust, sustainable, and well-funded social investments. This priority should be supported by clear and effective funding strategies, such as by establishing a dedicated ESF+ budget of at least 20 billion euros to this priority. In addition, the next ESF+ should maintain a minimum earmarking for all member states of at least 5 %, and include a higher earmarking of at least 10 % for countries with share of population at risk of poverty or social exclusion (AROPE rate) above the EU average, with a focus on targeting the most affected groups.

For further information on this priority, please refer to the [Alliance for investing in children paper](#), of which PICUM is a member.

Priority 6. Mainstream and enforce fundamental rights compliance across all EU funds

Key recommendations

- Strengthen enforcement of the horizontal enabling conditions tied to the Charter of Fundamental Rights by:
 - Improving the transparency and visibility of complaints mechanisms at national and EU level;
 - Establishing national, independent bodies to handle fundamental rights complaints related to EU-funded activities, ensuring the protection of complainants;
 - Introducing a system of formal consultations or shadow reporting on fundamental rights complaints and implementation of partnership principle to the European Commission.
- Exclude intrusive surveillance technologies and physical border barriers from eligibility for funding under the Border Management and Visa Instrument (BMVI), while prioritising rights-based measures like legal aid and child protection.
- Introduce a fundamental rights impact assessment system for high risk EU-funded projects and infrastructure, especially for BMVI activities.

In his [mission letter](#), Commissioner Serafin explicitly commits to strengthening the rule of law and respect for fundamental rights in the implementation of EU funds. This political priority must translate into robust, enforceable safeguards in the next MFF, building on - and going beyond - the current regulatory framework.

One of the [key advances](#) of the current MFF (2021–2027) was the introduction of clearer provisions making EU Home Affairs funding (AMIF, BMVI, Internal Security Fund or ISF) more clearly conditional upon respecting fundamental rights, through specific rules in the Common Provisions Regulation (CPR). These rules are known as “horizontal enabling conditions” and require member states to establish monitoring and accountability mechanisms that ensure compliance with the EU Charter of Fundamental Rights in the use of EU funds.

While this is a welcome development on paper, implementation [remains](#) uneven and opaque. For example, there is a lack of transparency around the existence and content of national arrangements for reporting cases of non-compliance with the Charter, as required by the CPR. Without public access to this information, fundamental rights accountability mechanisms risk being ineffective in practice. A [survey](#) conducted by PICUM and ECRE in January 2023 found that out of 59 civil society respondents from 24 countries, 40 were unaware of any channels to report human rights violations linked to EU-funded activities.

This is not just a gap in information, but a systemic accountability issue. As the Fundamental Rights Agency (FRA) recently [confirmed](#), the governance of EU funds still lacks the visibility and accessibility needed to ensure accountability and compliance with the Charter of fundamental rights.

Another challenge is the lack of independence and protection for complainants, particularly smaller or independent organisations. These groups may fear losing access to EU funds if they report mismanagement at the national level. This is especially problematic because, under the CPR, complaints are handled by the same authorities responsible for allocating funds at national level. As the European Ombudsman [has recommended](#), the Commission should consider strengthening the role of stakeholders - such as civil society organisations and fundamental rights bodies - in ensuring accountability. In particular, the next MFF should establish national independent mechanisms that allow complainants to directly report abuses related to EU-funded activities to independent bodies with the right expertise to deal with fundamental rights complaints. This system could also include periodic stakeholder consultation of CSOs and fundamental rights bodies and the submission of shadow reports on national complaint-handling processes and on the implementation of the partnership principle to the European Commission, who has the responsibility to ensure that fundamental rights are respected in all EU actions.

Furthermore, EU funding is currently being used for activities that may violate the fundamental rights of individuals. This is particularly the case with the BMVI, which is [financing](#) border management activities that significantly affect migrant rights at borders. In the next MFF, the BMVI should avoid supporting measures that are likely to disproportionately impact migrants’

rights, such as intrusive surveillance technology (such as drones, vehicles with [integrated artificial intelligence systems](#), or permanent surveillance infrastructures complementing physical barriers, which are currently eligible for funding), as well as walls and fences (which [are not](#) eligible for funding, but [object](#) of debate). A funding instrument for border management should take due account of measures actively promoting access to rights – for example, the protection of children or the provision of legal assistance at borders – which are legal obligations stemming from EU and international legislation.

With a likely intensification of activities at EU borders stemming from the implementation of the Pact on Asylum and Migration, the next MFF should be equipped with a strong system of accountability and fundamental rights checks to ensure that no harm is

caused by EU-funded activities. For instance, the [SHARED project](#) has previously suggested that the Commission should consider setting up a system where the disbursement of any EU resources in the area of border management and migration enforcement should be preceded by a human rights impact assessment. This would be particularly crucial before each deployment of high-risk technologies or other large-scale border management measures and infrastructures.

To address these shortcomings, the next MFF (2028–2034) must go further in operationalising fundamental rights safeguards, ensuring they are implemented transparently, consistently, and in a way that includes meaningful civil society participation.

Priority 7. Defend civic space from funding cuts and attacks

Key recommendations

- The next MFF should enable the EU to take leadership in defending civic space by mitigating funding cuts and attacks through dedicated and inclusive financial support, including for migrant-led organisations.
- Ensure that 30 % of expenditures for social inclusion in both AMIF and ESF+ are allocated to civil society and local/regional authorities, including through shared, direct, and indirect modalities.
- Ensure access to direct funding for civil society and local authorities, especially in countries with limited access to EU funds, where national priorities exclude social inclusion, or where the rule of law or other conditionality rules exclude the government from accessing EU funds.

The EU's response to the war in Ukraine provides a useful precedent and may inspire the way forward. Civil society and local and regional authorities were [recognised](#) as instrumental in delivering services and support to displaced persons from Ukraine. This experience offers valuable lessons. Building on the example of FAST-CARE,¹ future instruments supporting social inclusion activities should earmark 30 % of available funding to civil society and local/regional authorities through shared, direct, and indirect funding modalities.

Beyond financial insecurity, [civic space](#) is increasingly under threat from third-party attacks, excessive state interference, politically motivated funding cuts or withdrawals, and even [criminalisation](#) of civil society actors and staff. As [noted](#) by the Fundamental Rights Agency (FRA), meaningful participation of civil society in public affairs is essential for ensuring the full realisation of fundamental rights, particularly for marginalised communities. In addition to legal and policy safeguards, the EU must ensure that funding mechanisms are inclusive, accessible, and responsive to these threats.

As recognised by the [Commission communication on the Strategy for effective implementation of the Charter of fundamental rights](#), CSOs play a critical role in promoting and protecting Union values and the rule of law. They are often the [main implementers](#) of EU-funded inclusion activities, and [fill essential gaps](#) in support for vulnerable groups — including undocumented migrants — where access to basic services and fundamental rights is hampered by various obstacles.

However, CSOs across Europe working in the area of migration face significant challenges. Funding cuts, either directly from donors or due to recent [drastic reductions](#) in USAID support, including to UNHCR, are [affecting](#) many organisations working in the field of migration. As projects are scaled back or terminated, the EU must step in to ensure that funding is available and genuinely accessible to civil society actors delivering key services across the continent.

Direct funding opportunities, such as through the AMIF Thematic Facilities and the Citizens, Equality, Rights and Values (CERV) fund, should be further strengthened, especially in countries where they have limited access to EU resources or where national plans do not prioritise inclusion². This is particularly crucial in those countries where access to EU funding is blocked due to non-compliance with the rule of law or with the enabling conditions. While the conditionality mechanism and horizontal enabling conditions are necessary and legitimate tools to uphold EU values, it is important to ensure that local authorities and CSOs are not unduly affected by national-level failings. Cities [have recommended](#) that a specific safeguarding mechanism should be put in place to ensure that the EU resources frozen by the conditionality mechanisms are channelled through local authorities and other beneficiaries, such as CSOs, through directly or locally managed financing channels.

1 See recommendation 6 of the report "[Integration of people fleeing Ukraine in the EU](#)" (May 2023), drafted by Lodewik Asscher, Special Adviser for Ukraine to the European Commission.

2 See ECRE-UNHCR, Follow the money II, page 34. Available at: <https://ecre.org/wp-content/uploads/2019/01/Follow-the-Money-II-AMIF-UNHCR-ECRE.pdf>

Priority 8. Make EU funding more accessible to civil society organisations, including those that are migrant-led

Key recommendations

- Simplify EU funding rules by maintaining a unified set of common rules and procedures to manage EU funds introduced by the Common Provisions Regulation funds, which should continue to apply to structural funds and Home Affairs funds, and streamlining simplified cost options.
- Lower co-financing rates for projects targeting vulnerable or marginalised groups to improve access for smaller or grassroots organisations, including those migrant-led.
- Include small-scale grants to facilitate participation of grassroots organisations.
- Improve the information provision on EU funding at local level.

Barriers to EU funding continue to disproportionately affect a wide range of CSOs – including those that are grassroots, recently established, and those led by migrants. Many civil society organisations [face](#) numerous challenges in applying for EU funding: they often lack administrative capacity to navigate complex application procedures; encounter discriminatory practices (including disproportionate scrutiny when trying to open bank accounts); have limited access to information; and may be deterred by co-financing rates. A recent report by the European Court of Auditors (ECA) on the integration of third-country nationals supported by AMIF in the period 2014 – 2020 [warned](#) that the excessive administrative complexity in AMIF risks threatens to erode the fund's added value. Without targeted reforms, EU funding risks bypassing the very actors most capable of reaching marginalised communities.

To address this, the next MFF must further simplify funding rules, harmonise administrative requirements across programmes, and reduce bureaucratic burdens that disproportionately exclude small actors. Simplification is key to ensure more effective outcomes, as organisations embedded in local communities are often best placed to deliver impactful, context-specific solutions. Maintaining the Common Provisions Regulation and its unified set of rules governing multiple EU funds programmes – including AMIF, BMVI, and ISF – is a step in the right direction and should be preserved. Likewise, simplified cost options – which allows funding beneficiaries to use flat rates or lump sums instead of complex invoices – should not only be kept, but applied consistently across all EU countries to make funding fairer and easier to access.

To further simplify the funding landscape, the Commission plans to reduce the number of funding programmes in the next MFF. However, we are concerned that this may negatively impact the availability of dedicated support for specific groups, particularly those traditionally supported by the ESF+ or AMIF.

Finally, co-financing rates should be lowered for projects targeting vulnerable or marginalised groups to facilitate access to funding for organisations with small budgets — especially smaller organisations — and calls for proposals should include smaller-scale grants to facilitate their participation. For example, the co-financing rate of 90 % for [AMIF Unions Actions in the area of integration](#) is a good practice that should be maintained and replicated for similar actions under other funding programme, such as the ESF+. These adjustments would ensure that funding truly reaches those delivering inclusion services where it matters most.

Annex 1. Key observations on common points across consultations

This section provides additional observations on several important cross-cutting issues raised in the European Commission's consultation questionnaires. Specifically, we offer the following comments on the key policy challenges identified in the questionnaires (highlighted in bold below), followed by our responses to each:

Reducing the number of EU funding programmes

We believe that reducing the number of programmes risks undermining the ability of EU funding to respond to specific needs and priorities of particular groups. Specific needs require specific funding approaches and strategies, which would be undermined by a reduction in the number of programmes available.

Simplification and streamlining of fund-specific rules on access to funding and compliance

While we support the simplification of existing rules on access to EU funding, such efforts should not come at the expense of essential safeguards, especially those related to compliance with the rule of law and fundamental rights. The unified set of rules laid down in the Common Provisions Regulation does not represent an additional burden but serves as an important safeguard to ensure that all actors respect core obligations, including the application of the Charter of Fundamental Rights.

Flexibility to adapt to new and unforeseen developments

We recognise that new challenges, as experienced during the COVID-19 pandemic, require additional flexibility in EU funding. However, we would like to stress that additional flexibility should not come at the expense of long-term, essential investments, such as the social inclusion component of cohesion funding. Specific tools – such as dedicated emergency funds – should be in place to address unforeseen challenges.

Low absorption of EU funds and insufficient number of high quality projects

To address low absorption rates, it is crucial to reduce barriers to accessing EU funds and improve the dissemination of information at the local level. Only by empowering the actors best placed to meet local needs we can fully harness the potential of EU funding. This includes reducing co-financing requirements for projects targeting marginalised groups and promoting the availability of small-scale grants at the local level that are better accessible to organisations with limited budgets.

Insufficient focus on projects with the highest EU added value (e.g. multi-country projects)

We emphasise the critical role of multi-country projects — such as the Asylum Migration and Integration Fund (AMIF) transnational actions on inclusion — in delivering (direct) funding, particularly in countries where social inclusion is systematically deprioritised or where national-level funding remains inaccessible to Civil Society Organisations (CSOs). At the same time, we stress the continued importance of locally accessible funding opportunities that are tailored to the specific needs of communities on the ground. In particular, local opportunities available under programmes like the European Social Fund+ — which are deeply embedded in local and regional contexts — should remain a priority to ensure meaningful and inclusive impact.

Performance-based funding:

We support the principle that EU funding should increasingly focus on results. However, we would like to highlight that defining and measuring “success” in the context of social inclusion for marginalised groups can be particularly complex, especially in the short term. It is therefore essential to acknowledge the specific challenges the social sector faces in demonstrating measurable impact.



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