



Brussels, 28 May 2018

Ms Marianne Thyssen
Commissioner for Employment, Social Affairs,
Skills and Labour Mobility
European Commission
Rue de la Loi 200
1049 Brussels
Belgium

Dear Commissioner Thyssen,

With this letter the European Food Banks Federation sends its most respectful greetings and would like to express its concern about some elements of the future proposal for a regulation on the European Social Fund Plus as they could negatively affect the efficiency and effectiveness of the Fund for European Aid to the Most Deprived (FEAD) in the next programming period post-2020.

As you know, the FEAD Mid-Term Evaluation Interim Report¹ pointed out that one of the main successful factors of FEAD is the cooperation and collaboration between the different actors managing and implementing this Fund, such as managing authorities and Partner Organizations. Moreover, despite its limited scale and budget allocation, this Fund is a key tool for both Partner Organizations working in the field and final beneficiaries. It is evident that the provision of non-financial assistance to alleviate severe material deprivation through the delivery of food and material assistance can trigger real processes of sustainable reintegration of the most deprived as a prerequisite for social inclusion.

We represent 24 national federations of Food Banks and 4 projects in European countries, bringing together 388 food banks and branches which are committed to fight against food waste and to feed the most deprived. Our members daily provide 4.1 million meals to 8.1 million most deprived people through the collaboration with 44,700 charitable organizations and thanks to the professionalism of 23,500 co-workers (88% volunteers).² It is worth recalling that in 2017 our members redistributed 161,000 tons of food thanks to the FEAD.

In the future proposal for a regulation on the European Social Fund Plus it could be inserted the possibility to provide food and basic material assistance through vouchers, such as 'solidarity cards' with bar codes to be exchanged for food and/or basic material goods.

The philosophy underlying the FEAD is and should remain: 'food and/or basic material assistance with accompanying measures aimed at alleviating the social exclusion of most deprived persons'. Whilst we prefer the food and basic material assistance to the 'dematerialized material assistance' provided by vouchers we cannot argue that in some circumstances, the vouchers may be used successfully. However, it is not the first time that this system has been experimented in some Member States and it has been a failure each time.

Moreover, we would like to bring to your attention a few important concerns:

¹ Metis (2018) [Fead Mid-Term Evaluation, Interim Report](#).

² These figures represent the impact of FEBA network in 2017, including Tafel Deutschland which joined FEBA in March 2018.

1. It is evident that the budget necessary to alleviate food and severe material deprivation using commercial vouchers would be considerably much higher than the provision of a well-managed food and basic material assistance.
2. In certain Member States where populism is either entrenched or is gaining ground to the detriment of democracy, the vouchers could be used for reasons of political expediency in order to attract the support of the most vulnerable persons of our society, at the expense of those who have no voting rights. It could also exclude final beneficiaries because of their nationality. We have already experienced the misuse of the current FEAD for political gain by hiding the European origin of this assistance and therefore the vouchers could further facilitate this abuse.
3. Member States could decide to adopt vouchers for purely economic reasons and administrative cost savings, at the risk of not implementing accompanying measures.
4. The argument that one of the advantages of vouchers consists in preventing stigmatisation is fallacious. For instance, the use of a voucher in supermarkets could be much more degrading than a visit to a civil society organization where human contact, counselling and guidance can complement the mere provision of food and basic material assistance.
5. The provision of vouchers could easily exclude some target groups of final beneficiaries, such as children. It is worth recalling that the FEAD in the 2014-2016 period supported 11 million children.³

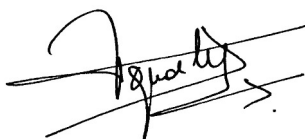
Further to these arguments, we would like to point out the following elements:

1. The FEAD Mid-Term Evaluation Interim Report identified some main constraints to the use of vouchers as *“the need to identify the end recipients, the possibilities of not using vouchers as intended, the need to include supermarkets in the audit trail, while it is not clear how accompanying measures will be provided”*;⁴
2. The procedure for the public procurement for printing and delivering the vouchers could lower the overall efficiency of the Fund, for instance in Poland the use of vouchers showed an increase in both the costs and the duration of the delivery;
3. Through the delivery of food and material assistance the European Union is concretely close to Partner Organizations and final beneficiaries every day. This Fund clearly shows the willingness of the European Union to offer a better future to all citizens and contribute to the European social dimension.

Finally, should you wish to maintain the possibility to provide food and/or basic material assistance through vouchers or cards, we think that it should be necessary to introduce very strict provisions: for instance, vouchers should not be delivered to final beneficiaries by agencies controlled by Member States but only through civil society organizations accredited by the European Union.

We would really appreciate if you could give serious consideration to our concerns when defining the future proposal for a regulation on the European Social Fund Plus. The FEAD plays a decisive role today because it provides an efficient and effective response to daily basic needs of tens of millions of EU citizens living in poverty. We urge that it may continue to fulfil the same function even in the next programming period post-2020.

Yours sincerely,



Jacques Vandenschrik
President



Angela Frigo
Secretary General

³ Metis (2018), p. 11.

⁴ *Ibid.*, p. 102.