



Brussels, 20 July 2020

To: President of the European Commission

Cc: Commissioner for Equality Helena Dalli and Secretary General Ilze Juhansone

RE: A chance for the EU to make history: invest in equality and justice for racialised people

Dear Mrs von der Leyen,

Existing data from our shadow reports, other NGOs and bodies such as the EU Fundamental Rights Agency show how racial discrimination is recurring across every area of society, is part of how European societies have been historically constituted and has a compounded impact on the well-being, dignity and rights of entire segments of the population.

This is an unprecedented moment for the European Union but also globally. With Covid-19's disproportionate [impact on racialised groups](#) and the anti-racism protests, the European Union can no longer turn a blind eye on deep structural inequalities and population's demands. Addressing racism is high on the agenda in many countries and international institutions. The EU could be at the forefront of this progressive agenda and drive positive narratives on equality. It could ensure investment is done for improving living conditions of racialised groups and lifting persisting structural barriers to equality. We know of too many "action plans" that remained on paper or tackled racism at a surface-level. This has led to a significant waste of energy and money while precariousness has increased for racialised groups, undermining their economic welfare, security, safety and well-being.

As organisations working for an equal and inclusive Europe, we welcome the European Commission's intention to launch an EU action plan for racial equality and think it could contribute to achieve equality and justice outcomes for racialised groups in Europe. While we understand the imperatives of a restricted time frame for consultation, we regret that there will not be, at this stage, a broader engagement with civil society, in particular the signatories of the present and our previous letter to President von der Leyen from 12th of June, endorsed by more than 150 national and international NGOs. Indeed, such an engagement would have increased the ownership and quality of the upcoming action plan. However, this would be only feasible and effective if the following approaches are included in the action plan:

1. Include a comprehensive understanding of structural racism and discrimination:

A strong understanding of structural racism needs to be reflected in the action plan as a basis for EU action. Tackling racism must include shifting the focus away from individual forms of racism to structural, institutional and historical dimensions, so that we can address racism perpetuated by the Member States and in structures in place. This can include acknowledging and addressing institutional practices, policies, cultural, social representations and norms, the legacy of historical oppression such as colonialism and slavery, all of which lead to deeply embedded racial inequalities. For instance, [combating police brutality and criminalisation of racialised groups](#) should be at the centre of the action plan as it plays a key role in maintaining and fostering racial inequalities in Europe. Over-representation

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and under-representation of racialised groups in certain sectors of society, as well as negative narratives and “common sense” perceptions, need to be uncovered by solid data and academic research and addressed meaningfully, such as in precarious housing and work, healthcare and education structures, prisons, etc.

The action plan also needs to acknowledge that race is still socially constructing certain groups in Europe, cover all racialised groups and forms of racism with their specificities, including Afrophobia but also Islamophobia, Antisemitism, Antigypsyism, Anti-migrant racism. It should take an intersectional approach, addressing the severity of discrimination based on race, class, gender, age and other characteristics of diversity.

2. Mainstream racial equality in all EU policies:

EU policies should not have a detrimental impact on racialised groups or contribute to further racial inequalities. In this context, the criminalisation of racialised groups by law enforcement services, for example in migration or counter-terrorism policies, needs to be addressed as a prerequisite to address structural racism. Existing policies and legislation should be reviewed and discriminatory practices disproportionately targeting racialised groups prohibited (e.g. racial profiling, border management repressions). Economic policies, but also other policies related to youth, education, employment, healthcare, also need to be questioned in the way they reinforce inequalities, including for racialised groups. Equality impact assessment should take into account racial inequalities.

3. Encourage EU Member States to address structural racism at national level:

Solutions need to be implemented at national and local level to have an impact. This action plan should become a strong tool for the [European Commission and Member States to collaborate closely and prioritise tackling structural racism](#). It could for example request Member States to adopt or improve National Action Plans Against Racism and push them to collect equality data disaggregated by race. It could also hold Member States to account for breaches of EU law prohibiting racial discrimination and racist crime by launching infringement proceedings. This action plan should foresee impact assessment and accountability mechanisms as well as monitoring of national and local actions, so that implementation is secured and results achieved.

4. Be a meaningful EU tool against racism with adequate resources and expertise:

To be effective in addressing structural racism consistently and transversally across all policy areas, different processes should be introduced, including:

- Ensure one coordinated department within the European Commission responsible for tackling structural racism
- Have strong mechanisms in place to involve EU and national NGOs and racialised groups in policy discussions and design
- Secure funding for this plan and for civil society organisations fighting against structural racism and for equality under the Multi-Annual Financial Framework and Recovery plans
- Improve the EU institutions’ internal strategies to ensure participation and representation of racialised groups



We believe these steps are crucial to ensure racial equality and justice, so that people from racialised communities can feel safe and are able to live, grow and thrive in the European Union, which will ultimately benefit the well-being and prosperity of all Europeans.

Co-signed by:

1. Africa Solidarity Centre Ireland
2. ALTERA Italy
3. Antigone
4. Anti-Racist Forum
5. Arciragazzi Portici
6. Asociación Musulmana por los Derechos Humanos
7. Associação Kazumba
8. Balbriggan Integration Forum
9. Ban Ying Koordinations- und Beratungsstelle gegen Menschenhandel e.V.
10. BePax
11. Bruxelles Panthères
12. Collectif contre l'islamophobie en Belgique - CCIB
13. Colectif contre islamofobieet descrimination
14. Churches' Commission for Migrants in Europe - CCME
15. Center For Equality Advancement
16. Center for Migration, Gender and Justice
17. Central Council of German Sinti and Roma
18. Centre for Peace Studies
19. Centre Regional d'Integration de Charleroi
20. CSC Bruxelles
21. Czech Helsinki Committee
22. Dialogue Platform
23. Discrimination Law Association
24. ELLA
25. ENAR Belgium
26. ENAR Denmark
27. EOTO – Each One Teach One
28. Equal Opportunities Initiative
29. Euro-Mediterraan Centrum Migratie & Ontwikkeling - ENCEMO
30. European Network of People of African Descent - ENPAD
31. European Network Against Racism – ENAR aisbl
32. European Network of Religion and Beliefs – ENORB
33. European Network of Women of African Descent - ENWAD
34. European Race & Imagery Foundation - ERIF
35. European Roma Grassroot Organisations - ERGO Network
36. European Roma Rights Centre – ERRC
37. European Support Network to Brazilian Women Victims of Domestic Violence - REVIBRA

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38. European Association of Lawyers for Democracy - ELDH
39. Filipino Women's Council
40. Fundación Altanar
41. Giolli Cooperativa
42. Greek Council for Refugees - GCR
43. Greek Forum of Migrants - GFM
44. Grupo Educar
45. Hand in Hand Against Racism
46. Help Refugees
47. KISA
48. ICA España
49. Informations- und Dokumentationszentrum für Antirassismuarbeit e. V. - IDA
50. Initiative für ein diskriminierungsfreies Bildungswesen - IDB
51. Irish Network Against Racism – INAR
52. Integriepact
53. Integro Association
54. International Federation of Resistance Fighters - FIR
55. LALLAB
56. Lithuanian Centre for Human Rights
57. Migrant Tales
58. Minderhedenforum
59. Pan African Movement for Justice
60. People for Change Foundation
61. Presencia Gitana
62. Red de Apoyo a la Mujer Inmigrante víctima de violencia de género
63. Red Española de Inmigración
64. Refugee Rights Europe
65. Roma Community Centre
66. School zonder Racisme
67. SEER
68. SEMPER Scotland
69. SIEMPRE Belgium
70. Slovo 21
71. SOS Malta
72. SOS Racisme Denmark
73. Stichting OCAN
74. United Sikhs
75. Vie Feminine
76. With or Without - WoW e.V.

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