



**Expert Workshop on the Distribution  
of Financial Support to Organizations  
Representing National Minorities  
Flensburg, Germany  
5-6 December 2013**

*Andreea Cârstocea*

REPORT # 65  
July 2014



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**ECMI Report #65**  
**European Centre for Minority Issues (ECMI)**  
**Director: Dr. Tove H. Malloy**  
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# Expert Workshop on the Distribution of Financial Support to Organizations Representing National Minorities.

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*The workshop examined a set of issues related to the funding directed by states to national minority organizations (broadly understood, thus comprising minority parties, minority councils, minority associations, etc) to enable the participation of ethnic groups to political and public life. The workshop was structured around three main themes: (1) Funding of projects proposed by minority organizations; (2) Funding and political participation; and (3) Funding of minority organizations in an international perspective.*

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## **I. INTRODUCTION**

### *Background to the workshop*

In 2009, the Committee of Experts on Issues Relating to the Protection of National Minorities (DH-MIN) decided to further its research on the distribution of public financial support for projects concerning persons belonging to national minorities and their organizations. To this purpose, a questionnaire was drafted and sent to member states, asking them to submit information on a range of topics related to the distribution, use, and auditing of this type of financial support. In 2010, following the receipt of answers from 23 member states, a compilation of these answers was

drafted and made public; however, with the DH-MIN discontinuing its activity in 2010, the analysis of the contents was not carried out.

The DH-MIN initiative was meant to fill a gap in the knowledge and understanding of the mechanisms underlying the distribution of financial support to minority organizations in Europe. Quite surprisingly, in spite of the fundamental importance of ensuring adequate funding to minority organizations for the effective participation of national minorities to political and public life, both academic

literature and policy analysis on this topic are sparse.

The workshop proposed by the ECMI aimed to contribute to the advancement of knowledge and understanding of the issue of funding of minority organizations, by identifying areas in need of further research and by attempting to create a framework that will allow for future comprehensive recommendations to governments in this respect.

### *Objectives and scope*

The workshop examined a set of issues related to the funding of national minority organizations (in the broader meaning of the term), such as minority parties, minority councils, minority associations, etc. The focus of the workshop was on the issue of funding as directed by states to minority organizations, thus enabling the participation of these ethnic groups to political and public life.

Given the limited literature on this topic, such a discussion appears as both relevant and timely. The participation of national minorities to political and public life is to a great extent determined by the activity of ‘representative’ organizations, and for them to be able to function adequately funding is of fundamental importance. The amounts and manner of distribution of financial support, its uses, and the mechanisms in place to oversee the legality and transparency of its use are all important components in this process.

What this workshop *did not* intend to cover was the issue of direct funding

earmarked by the state for activities undertaken by public bodies (e.g. funding made available to the Ministry of Education for education in / of minority languages). The workshop was thus more narrowly focused on the funding made available to minority organizations, both for political and project-based activities; the final part of the workshop attempted to analyze this issue from an international perspective, i.e. by looking at the funding offered by various kin states to the respective minority organizations and their justifications.

The workshop was opened by Dr Tove Malloy, Director of ECMI, by emphasizing the relevance and timeliness of the topic under discussion. Dr Malloy stressed the need for ideas on the subject to become better structured, the need for knowledge to be compiled and actors identified, and adequate networks to be created, comprising both researchers and practitioners, so that the issue of minority funding is better understood, and recommendations to governments can be improved and implementation subsequently optimized.

Also in the introductory part of the workshop, the keynote speaker, Dr Detlev Rein, outlined the main topics of discussion, by referring to both his experience as chairman of the DH-MIN during its efforts to collect information concerning the funding of minority organizations, and by using the example of Germany and its practices in offering financial support to the various types of minority organizations on its territory. Dr Rein reflected on each of the three sections of the workshop, highlighting some of the most pressing questions raised

by them. As such, in the case of the funding of projects proposed by minority organizations, the speaker emphasized the importance of understanding the various implications of a fair distribution of funds among the various minority groups, as well as the rationale of funding such projects, e.g. understanding how priorities are set and how minority needs can be best met. Concerning political participation, Dr Rein stressed the importance of analyzing available funding by first looking into the types and roles of organizations existing in any state, such as private law associations of minorities; special associations, bodies and committees where minority questions are dealt with; minority parties or associations running for seats in local, regional or national parliaments. In the absence of a clear methodological approach, an analysis of the funding available for political participation would not be meaningful. Finally, concerning the third section of the workshop, focusing on minority funding from an international perspective, Dr Rein remarked on the growing interest in this topic. His presentation outlined the main aspects of the international legal framework concerning transnational funding for national minorities, reflecting also on their importance and applicability.

Building on the ideas outlined by Dr Rein, Dr Malloy emphasized that the workshop would be focusing on the actual implementation of existing models, thus aiming to identify good practices in the field, to be followed in the future by adequate recommendations to governments.

## **II. Funding of projects proposed by minority organisations.**

*Rationale:* Many states, in addition to the funds made available via public institutions, earmark funds for a range of projects to be implemented by minority organizations (or NGOs with an interest in developing minority-related intercultural, educational etc. projects). Here, important (and rarely researched) questions relate to the criteria employed by states in selecting the projects and the recipients of the funds, or the amount earmarked for each project. How (and if) states establish their spending priorities, how they evaluate and measure the impact of the projects selected for funding, and what mechanisms of transparency (e.g. financial reports, auditing, control authorities, sanctions, etc.) are in place are fundamental issues, both for the recipients of funding and for the awarding public bodies.

This section of the workshop used two case-studies as starting points for the discussion: that of Croatia, presented by Dr Antonija Petričušić, and that of Romania, presented by Mr Gábor Ádám.

The Croatian case study revealed a set of positive legal developments for national minorities, which nevertheless – as argued by Dr Petričušić – are not reflected into practice, given that support for minority rights deteriorated quickly after Croatia's accession to the European Union. Concerning the funding of projects for national minorities, in Croatia it mostly concerns cultural autonomy and amounts to some 10 million Euros every year. The dysfunctions identified in the presentation referred to the manner in which distribution

of funds is performed (which might explain the frictions between majority and minorities); the lack of monitoring as to how funding is used and the lack of financial accountability of minority organizations; the increased intra-minority competition for funds among organizations (as many of them claim to represent the same group), leading to suspicions of clientelism.

Mr. Adam presented a detailed case study on Romania, outlining the main institutional aspects related to the funding of the projects proposed by national minorities. Thus, the institutions responsible for funding these projects are the Department for Interethnic Relations (yearly open calls for proposals; in 2013 a total of 733,000 Euros were allocated for projects); the Council of National Minorities (bringing together 19 organizations representing 20 minorities, with a total budget of ca. 19 million Euros in 2013); the National Agency for Roma (open calls for proposals for Roma related projects initiated by NGOs; in 2013 the total sum allocated was 432,654 Euros); the Administration for the National Cultural Fund (funding through applications for publishing or cultural projects); county councils / local councils (cultural, educational, social projects, including minority related projects in some counties/cities). While at a first glance there are multiple possibilities for obtaining funding for minority-related projects, Mr. Adam argued that in practice there are many obstacles to obtaining such funding. Among these, the most prominent obstacles arise from the fact that the public funding available is generally offered in small amounts per project (as institutions prefer to

offer many small grants, of 4-5,000 Euros per project); the funding is often based on reimbursement, making things difficult sometimes for small minority NGOs which lack the initial resources for implementing a project; the lack of long term strategic funding, with institutions favoring the funding of one-time events; the fact that funding is influenced by the national budget cycles, so that funds are available only between April and November; the lack of transparency procedures concerning the project selection process; the lack of impact evaluation of the use of funding by minority NGOs.

Following the two presentations, participants debated a number of issues relating to the funding of projects proposed by minority associations:

#### *Selection processes*

- Participants commented on the extent to which the distribution of funds is often a political decision, with funding being used as a tool to ‘buy silence of’ minorities;
- Considering the generally small amounts of money provided, it may be the case that such forms of funding can be counterproductive and used to control certain parts of minority populations, rather than fulfilling cultural, educational etc. purposes;
- Distribution of funds for projects proposed by minority organizations is generally kept outside the public discourse, as the general public is not usually aware of the size and availability of funding;

- Concerning decision-making on funding issues, participants noted that there is often no independent board to decide on applications for funding, and for that reason the money may be allocated to projects that are not reflecting the priorities of minority groups.

#### *Recipients of funding*

- Participants debated whether census data should be a deciding factor in the allocation of funding for minority projects. Problematic aspects to such an approach are firstly the fact that census questionnaires often do not reflect the reality on the ground, and secondly the fact that members of minority groups might not trust data protection mechanisms and thus fear discrimination if they reveal their ethnic identity;

- Some states do not collect data on ethnic grounds, making such an approach difficult;

- On the other hand, census data is an important means for improving measures for minority groups, provided that data protection is adequate; having an estimate of the size of the minority populations allows for measures to be more specific and targeted to their needs;

- Some participants brought up the question whether new minorities should be part of such research, noting that states generally do not include these groups among those eligible to apply for minority funding;

- It was noted that in many cases national minorities do not support the inclusion of new minorities among the groups eligible for such support, as that

would mean a further reduction of the budget.

#### *Adequacy of amounts allocated*

- In trying to identify patterns of distribution of funds, researchers should also focus on historical data; in certain cases, amounts initially allocated have simply constantly risen over the years, without however states ever giving details on how that initial decision on amounts was reached.

#### *Danger of ghettoization*

- Participants noted that there is a certain danger of ghettoization through the funding of single minority projects, especially in the case of very vulnerable minorities;

- The use of funding for intercultural dialogue may be a solution to promote the integration of minorities.

#### *Transparency*

- Participants pointed to the importance of adequately balancing the implementation of minority rights with the duties concerning monitoring and transparency of minority organizations;

- Identifying the most effective ways to obtain the information on funding issues where transparency is lacking is particularly important for carrying out research;

- In debating on who is responsible for demanding transparency, participants agreed that minority groups, civil society organizations, and also monitoring bodies should ask for greater transparency in the distribution of funds.

### *Corruption*

- While corruption and lack of transparency may not be perceived as an issue in certain countries, since documentation (invoices etc.) needs to be presented for reimbursement, researchers need to be aware there are ways around handing in invoices, meaning that the questions of corruption and transparency should not be taken lightly, as they involve looking beyond paperwork;
- Where states have instituted mechanisms of control concerning the spending of public funds, these need to apply to minority projects as well.

### **III. Funding and political participation**

*Rationale:* This thematic component of the workshop concentrated on how the political participation of national minorities is facilitated through the availability, distribution, and use of public funding. Among the most important issues in need of examination were the manner in which minority organizations (i.e. minority parties, associations, or councils) are generally funded, by analyzing the requirements and restrictions that are in place, and their practical effects (e.g. whether subventions are made available only for the duration of the electoral campaign or whether they are permanent; whether private donations are allowed, and if so, whether they may come from anonymous or foreign sources, and up to what limit). The procedure whereby minority organizations are selected for receiving public funding was identified as fundamental, while naturally the

appropriateness of the funds, in their totality and as distributed to each minority is also very important.

The starting points of this section were a theoretical presentation outlining the issue of funding and political participation of national minorities in a comparative perspective, by Dr Sergiu Gherghina, and two case studies focusing on Poland (presented by Dr Krzysztof Drzewicki) and respectively on Hungary (presented by Dr Balázs Dobos).

Dr Gherghina introduced the issue of funding and political participation of national minorities by first clarifying a few concepts fundamental to this topic. Thus concepts such as political participation, mobilization, and ethnic parties were comprehensively discussed and clarified, the presenter then proceeding to outline the role and advantages of ethnic parties and the types of public funding available to ethnic parties in a comparative perspective. The presentation also reflected upon the rationale for public funding for ethnic parties, with an emphasis on the different rules for allocation across post-communist countries. The presentation provided a solid theoretical starting point for the discussions in this section of the workshop.

The case study on Poland outlined the peculiarities of the system of political participation of national minorities in place in that country and its shortcomings when it comes to funding this type of activities. Prof Drzewicki discussed the issue of funding for electoral participation of minorities in Poland, pointing towards the difficulties encountered by these in raising the initial amounts needed for participating in

elections; these have to be obtained through donations, due to the fact that the system is based on post-electoral costs, meaning that groups or individuals receive funding only after they obtain seats in Parliament. Apart from this funding channel, there also exists a fund (averaging some 30 million Euros every year) to which minority organizations can apply, intended for the protection, maintaining, and development of the cultural and linguistic rights of minorities. According to Prof. Drzewicki, this fund can be indirectly used for political participation purposes (e.g. training of leaders, access to media etc). As a concluding note, the presenter argued that these two types of regulations need to be clearly separated, as the electoral law has distinct purposes and should have a specific and strict legislation, whereas minority associations need substantive legislation, but also greater financial control.

The case study on Hungary outlined the different funding channels for minority representation and participation available to Hungary's national minorities. Dr Balázs Dobos presented the system of funding available to minority associations, ethnic parties, and minority self-governments (which are free to define their own structure, budgets, etc. but whose all financial activities are checked by the national accounting office), with each self-government group eligible for same normative support. In addition, the presenter also outlined a further avenue for political participation, namely through running for parliamentary elections; according to Dr Dobos this is a much more difficult way to improve political participation, with only a

handful of minority candidates obtaining a mandate in Parliament.

Following these presentations, participants debated a number of issues relating to the funding and political participation of national minorities:

#### *Census data*

- Participants came back again to the issue of the size of minority communities, debating whether the amounts of funding available for political participation should be tied to the size of the communities;

- In this respect, censuses provide only limited data, and may not even be available in some European states.

#### *Adequacy of financial allocations*

- An important issue covered in the discussions focused on how to determine whether the level of funding for minority participation is adequate, with some participants arguing that simply increasing financial allocations does not guarantee improved participation;

- Should larger financial allocations equate more representation and participation, this would mean that public authorities have a very powerful tool in their hands.

#### *Participation at local vs. participation at national level*

- Experience in some states has shown that local governments have less opportunity for 'wasting' money and thus participation at local level might be more effective;

- This of course does not apply to all types of minorities, as it is highly dependent on their level of geographic concentration, size, socio-economic situation, etc.;

- With so many differences among minority groups (from a geographical, socio-economic, political etc. point of view), it appears that a methodology would need to be identified for assessing the adequacy, access to, and efficiency of funding allocations;

- Policy-makers and researchers need to be aware of the danger of promoting assimilation, rather than integration of national minorities.

#### *Intra-group electoral competition*

- Participants debated whether funding of political participation might be conducive to excessive intra-minority electoral competition;

- This appears to be particularly relevant in the case of large national minorities, where incentives for competition are stronger as there is a scope for more parties to take part in (and potentially win) the elections;

- In the case of very small minorities, there is an opposite dilemma, as due to the lack of incentives to participate in elections (e.g. only one seat allocated in Parliament for the entire group), representation can be monopolized by just one minority party or organization.

#### *Ethno-business*

- Public funding for electoral participation may also lead to a series of unexpected consequences; some of these

have emerged in countries such as Hungary, Romania, or Croatia, and have been known under the label of ‘ethno-business’ or ‘ethnic business’;

- Examples of such unexpected consequences are votes cast for certain ethnic parties in regions where those ethnic groups are not present (e.g. Greek party in Romania) or the case of the NGO falsely claiming to run in elections as representative of the Slovenian ethnic group in Romania; also from Romania came the example of the Italian party that contested their own leader for not belonging to the Italian minority;

- A normative question arising from this issue appeared to be that of whether ethnic parties should be required to prove that they actually represent minorities; related to this there is also a methodological issue as to how they could do that in practice;

- Instances as those listed above, although rare and exceptional, may generate damages to the perception of minority groups and might lead to restrictions to the participation of national minorities to political life (e.g. systems might get more restrictive and thus end up excluding legitimate parties and organizations from participation);

- These cases point to the inherent tension between attempts at inclusive policies and the danger of potential abuse by individuals or organizations.

#### *Funding as a political tool*

- As in the case of the funding for projects proposed by organizations of national minorities, participants noted that there is a potential scope of governments to

use funding of minority parties as a political tool;

- In certain cases it has been observed that minority parties tend to vote for the decisions of the government, and that they rarely join the opposition;

- In this respect, it emerged that it is fundamental that governments offer incentives for increased political participation without tying them to any conditionality (so that they are not perceived as ‘blackmailing’ minorities).

#### **IV. Minority funding in an international perspective**

*Rationale:* Occasionally, the issue of national minorities takes on an international dimension. This is particularly true in the case of kin states, which sometimes provide support (financial or in kind) to their co-ethnics living in neighboring countries. As shown by the Hungarian Status Law, such an approach invites a host of normative questions, starting from the very general (i.e. whether states have a moral duty to provide such help) to more particular (e.g. what forms of help are acceptable, and in what areas). Over time, a set of standards has emerged (e.g. the Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations); the extent to which states abide by these is however a matter of debate. Kin states sometimes appear to support the setting up of organizations representing the respective kin minority, or – where such organizations are already in place – to favor one or more of these (whether parties or associations), supporting

them (sometimes financially), and thus arguably intervening in the life of the respective community and the political life of that state, respectively.

This section of the workshop had three presentations as its starting point, aiming to provide both a theoretical and a comparative perspective on the issue of minority funding from an international perspective. In this respect, Dr Malloy presented a theoretical and comparative perspective on the unilateral legislation in favor of kin minorities in ten selected European countries, followed by a case study of Hungary’s policies as a kin state, presented by Dr Szabolcs Pogonyi, and by a case study of Turkey’s policies as a kin state, presented by Dr Nurcan Özgür Baklacioglu.

Dr Malloy outlined the main aspects of customary international law, as well as the main characteristics of multilateral and bilateral treaties concerned with the treatment of kin minorities. Dr Malloy focused in particular on European unilateralism, tracing it back to the League of Nations, and following up with a chronological presentation of 10 countries, including Austria, Italy, Slovenia, Slovakia, Greece, Russia, Bulgaria, Hungary, Romania, and Denmark. The comparative analysis of the policies of these states towards their kin minorities revealed that kin state funding for its minorities generally targets individuals belonging to the respective ethnic groups, and less so their organizations. Dr Malloy concluded that in the cases of Italy, Slovenia, Bulgaria, and Denmark, and also to an extent Russia, one

can clearly distinguish unilateral actions targeting kin minority organizations.<sup>1</sup>

In outlining the case of Hungary as a kin state, Dr Pogonyi highlighted some of the most important developments in this respect since 1989, such as Hungary's 2004 accession to the EU and the dilemma it posed due to the fact that Hungarians from Romania could consequently only travel to Hungary if they had a visa; the Status Law issue and its criticism by the Venice Commission; the 2004 failure of the referendum on dual citizenship; the 2010 Act on Citizenship, granting dual citizenship to Hungarians abroad; and the 2011 electoral law on non-resident voting rights. Concerning funding, the main dilemma in Hungary appears to be whether it should be centrally managed, or whether trans-border organizations should have a more direct role. There are two types of support offered to Hungarian populations abroad: non extraterritorial, consisting of benefits for members of these groups on the territory of Hungary, and extraterritorial, such as funding of schools and media institutions in their states of residence. The total amounts of funding are between 0.1-0.2 percent of the state budget. A more controversial aspect of the use of funding for the Hungarian minorities abroad refers to the financial support offered to Hungarian political parties in those states where they reside (i.e. particularly in Slovakia and Romania).

The third presentation outlined the most relevant aspects of Turkey's policies towards its kin minorities abroad. A fundamental development in this respect appears to have been the adoption of a more

inclusive definition of Turkey's kin minorities after 2001, as comprising all Muslims originating from previous Ottoman territories (previously only Turkish-speaking Muslims with Turkish roots were defined as the kin minorities). The second most important change in policies towards kin minorities occurred in 2009, when for the first time a comprehensive set of legislation was adopted, including institutions and an official budget for supporting the kin minorities abroad. According to Dr Özgür Baklacioglu, two important paradigm shifts have occurred in recent history: on the one hand, in the 1990s Turkey started to promote cross border migrant associations established by immigrants such as Bosnians, Albanians, and generally Turkish immigrants from the Balkans; on the other hand, Turkey has increasingly focused on the rights of Turks living abroad, prioritizing those living in the European Union, with the aim to harmonize their rights with the rights of other immigrants to the EU.

Following the three presentations, participants debated a number of issues relating to the funding of minorities by their respective kin states:

*Political vs. legal unilateralism*

- Starting from the presentation of Dr Malloy, a debate ensued among participants as to the differences between political and legal unilateralism;

- In particular, some participants were interested in whether the funding made available by Germany for its German kin minorities in Eastern Europe and Central Asia could be considered a form of unilateralism;

- The issue of the funding made available to the Danish minority in Germany and to the German minority in Denmark by the respective states was also analyzed from the perspective of unilateral action.

#### *Types of kin state funding*

- In the course of the discussions it emerged that it is necessary to develop adequate methodological tools in the analysis of kin state funding, as research on the topic is scarce and appropriate methodology is lacking;

- As such, participants distinguished among several types of funding to be analyzed separately in further research: targeted to individuals vs. targeted to organizations; through legal channels vs. informal payments (e.g. through private companies or foundations); from public funds vs. from private donations;

- As an example of the use of informal channels for the transfer of funds, participants discussed the situation where the 2006 law in Romania concerning party funding forbade foreign funding; as such, funds from Hungary were transferred to cultural organizations or Hungarian private investors in Romania, and from there on to one of the Hungarian parties in Romania;

- It was agreed that in the absence of research on the topic, this could constitute a very interesting avenue for further research and collaboration in the future.

#### *Identification of communities targeted*

- Kin states have a range of options in selecting the kin communities they wish to offer support to; among these, some states emphasize ancestry and language skills in identifying individuals belonging to their respective kin minorities, others distinguish between diasporas and traditional communities, etc.;

- The case of Croatia was brought up as one of the more complex examples, as it distinguishes among three categories of Croatians living abroad: from Bosnia and Herzegovina, Croatian Diaspora and Croatian ethnics;

- How a state defines and supports its kin communities has further implications; for instance, the amount of money granted to Croatians from Bosnia and Herzegovina is higher than to other Croatian communities, with money mostly granted for health services and education;

This differentiation in treatment should be taken into account when researching further the issue of kin state funding of its kin minorities.

#### *Kin state funding for domestic electoral purposes*

- Participants noted that one of the reasons for the interest taken by some states in their respective kin minorities has to do with the fact that members of those groups often have dual citizenship, thus being entitled to vote in their kin states;

- In the case of Hungary, the newly instituted voting rights led to political parties trying to support trans-border

organizations that can potentially bring them around 0.5 million votes.

*Risks of diminishing funding from the state of residence*

- Participants discussed the problem of kin state dependency arising from the availability of funding for their respective minorities, pointing towards the risk that once a kin state offers more support for its minorities, they will have fewer incentives to demand adequate funding from the government of their state of residence;

- Conversely, the fact that kin states provide large amounts of funding to their minorities could potentially be used by governments of the states of residence as a pretext to reduce or cancel the funding for those communities (arguing that they have already received money from their kin state).

*Interference in the domestic affairs of another state*

- This emerged as perhaps the most controversial aspect of the issue of kin state funding towards its minorities abroad;

- Participants discussed the example of Hungary as one of the states that has attempted to influence the domestic politics of other states by making sure that Hungarian parties there served its interests (in particular in Slovakia and Romania);

- This does not only affect domestic politics generally, but interferes with the representation of the respective minority groups as well; e.g. in Slovakia, where there are two Hungarian political parties, the Orban government has supported the party that is less recognized and

supported by the Hungarians in Slovakia; in Romania there has been a similar situation;

- In certain situations kin state politics is ‘exported’ outside the kin state through funding and the creation of new organizations. Conversely, in certain cases there is also an ‘import’ of the kin minority problems into the politics of the kin state.

## **V. Conclusions and follow up**

Based on the debates that took place during the workshop, one obvious conclusion is that funding of national minorities is a fundamental issue. Moreover, with extremely little research available on this topic, there is a pressing need for developing research methodologies, for collecting data, and carrying out both empirical and theoretical research. In the absence of further research, it will continue to be very difficult to assess the adequacy of the funding offered to national minorities, and policy recommendations to governments promoting good practices will be extremely difficult to draft.

The workshop pointed to a few of the most promising avenues for research, and participants agreed to keep in close contact and develop further collaboration on the topic. In June 2014, a panel was organized at the CEU-ASN conference, where several seminar participants presented some of the debates outlined above. Concerning concrete further steps, ECMI will lead the way to producing a publication containing the results of the workshop, while on longer term it plans to develop a wider research project concerning the funding of national minorities in Europe.

## Notes

<sup>1</sup>For more details, see Tove H. Malloy, European Minority Rights Law: Unilateral Legislation in Favour of Kin-Minorities, *ECMI Working Papers*, 61, 2012. Available at [http://www.ecmi.de/uploads/tx\\_lfpubdb/Working\\_Paper\\_60\\_Final.pdf](http://www.ecmi.de/uploads/tx_lfpubdb/Working_Paper_60_Final.pdf)

## *PARTICIPANTS*

- **Gábor Ádám:** Director of the Ethnocultural Diversity Resource Centre, Romania
- **Dr. Andreea Cârstocea:** Senior Research Associate at the European Centre for Minority Issues, Germany
- **Balázs Dobos:** Hungarian Academy of Sciences, Hungary
- **Krzysztof Drzewicki:** Deputy Director of Department & University of Gdansk at Ministry of Foreign Affairs of Poland, Poland
- **Dr. Sergiu Gherghina:** Postdoctoral Research Fellow & Lecturer at Goethe University Frankfurt/ Main, Germany
- **Dr. Eric Gordy:** University College London, UK
- **Dr. Priit Järve:** Independent Researcher, Estonia
- **Dr. Jarmila Lajčáková:** Center for the Research of Ethnicity and Culture, Slovakia
- **Dr. Tove H. Malloy:** Director of the European Centre for Minority Issues, Germany
- **Dr. Nurcan Özgür Baklacioglu:** Istanbul University, Turkey
- **Dr. Antonija Petričušić:** University of Zagreb, Croatia
- **Prof. Dr. Szabolcs Pogonyi:** a Visiting Professor in the Nationalism Studies Program at the Central European University
- **Detlev Rein:** Independent Researcher, Germany
- **Bernard Rorke:** Open Society Foundations, Hungary
- **Tibor Toro:** Sapientia Hungarian University of Transylvania, Romania
- Many thanks to **Kavita Bapat**, **Oana Buta**, and **Sonja Wolf** for their help with taking notes during the seminar

### ABOUT THE AUTHOR

#### **Dr. Andreea Cârstocea**

Senior Research Associate at the European Centre for Minority Issues, the Politics & Civil Society cluster, Germany

Contact: [carstocea@ecmi.de](mailto:carstocea@ecmi.de)

### FOR FURTHER INFORMATION SEE

EUROPEAN CENTRE FOR MINORITY ISSUES (ECMI)

Schiffbruecke 12 (Kompagnietor) D-24939 Flensburg

☎ +49-(0)461-14 14 9-0 \* fax +49-(0)461-14 14 9-19

\* E-Mail: [info@ecmi.de](mailto:info@ecmi.de) \* Internet: <http://www.ecmi.de>