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Civil Society Engagement in the EU Association Agreements and New Growth Plans

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**Ministero degli Affari Esteri
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Introduction

EU enlargement policy regained momentum in the wake of Russia's full-scale invasion of Ukraine in 2022. The change of the geopolitical circumstances, the security challenges and the evolving priorities at EU level marked a departure from more than a decade of navigating in uncharted waters and disillusionment, generating fresh dynamics and expectations for some of the Western Balkans' in their pursuit of membership.

Once the three Eastern Neighbourhood countries - Ukraine, Moldova and Georgia (the Associated Trio) - which, over the previous two decades, had developed with the EU an integration model based on the principle of 'all but the institutions' were offered the candidate status due to the emerging security concerns, the European Commission had to change approach to the WB too.

Bosnia and Herzegovina, meanwhile, was given the green light to open accession negotiations. Montenegro made notable progress, provisionally closing 14 negotiating chapters, while Albania closed three. Only Kosovo remained behind in its EU integration process, holding still the potential candidate status.¹

In addition, the European Council marked an additional step forward by launching gradual integration as a leading political approach to the accession process. Although its practical implications are yet to be fully defined, gradual integration enables enlargement countries to progressively participate in selected EU policies and programmes and gain access to parts of the Single Market, conditional upon the fulfilment of specific reform benchmarks. Gradual integration is neither linked to nor does it have an impact on the formal accession negotiations between the candidate countries and the EU.²

In Commission's perspective gradual integration would provide for a series of benefits to the candidate countries during the pre-accession period, accelerating the pace of alignment with EU acquis, which would result in a speeding up of the negotiations, besides the positive effects on economic growth.³

Early this year, as part of a personal initiative, Albanian Prime Minister Edi Rama and Serbian President Aleksandar Vucic proposed harvesting the potential of gradual integration by bringing their countries into the EU Single Market and Schengen Area, without placing additional strain on the Union's decision-making architecture or institutional balance.⁴ This move was perceived as shifting away from the traditional accession process and cherry picking some benefits from the closer relationship with the EU.

¹ Whereas Georgia was granted candidate status upon condition of implementing a series of reforms.

² Buras, P., et al. (2025), Gradual Integration: Bringing Aspiring Members Closer to the EU. Think Tank Europa and European Council on Foreign Relations. ECFR. Think Tank Europa.

³ Follow-up from the Commission INT/1058, to the European Economic and Social Committee, Potential challenges for the European single market arising from the future enlargement of the Union, available at: <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/potential-challenges-european-single-market-arising-future-enlargement-union#downloads>

⁴ Edi Rama E., Vučić A., (2026), Das wäre ein realistischer Weg in die EU. Frankfurter Allgemeine Zeitung, available at: <https://www.faz.net/aktuell/politik/ausland/serbien-und-albanien-ein-realistischer-weg-in-die-eu-accg-110845507.html>

Several civil society organisations argued that gradual integration cannot serve as a substitute for the EU enlargement process, which is deemed as “a long-term process of state and social transformation”.⁵ If the Rama-Vucic proposal was deemed an interesting avenue for the EU, the gradual integration of candidate countries in the aforementioned policy areas would risk slowing the pace of reforms in other areas, particularly those covered by the fundamentals cluster.⁶ Instead, according to these same civil society organisations gradual integration should be understood within a broader framework, extending beyond technical alignment with the *acquis*, to prioritise above all the strengthening of democracy and the rule of law.⁷

To restore enthusiasm in the candidate countries and cope with the challenging economic performance, the Commission introduced a new political initiative at the end of 2023, called the Growth Plan for the Western Balkans, along with its dedicated financial instrument, the Reform and Growth Facility (RGF). It aims to stimulate reforms and enhance economic convergence in the WB6 countries, allowing them to reap the benefits of gradual integration prior to full membership. The financial envelope is composed of grants and loans at favourable rates, which top up to the existing IPA III mechanism. The Growth Plan is a performance-based instrument, whereby the disbursement of funds is contingent upon the delivery of pre-agreed reforms by the government concerned until the end of 2027. Drawing on the WB6 experience, the Commission adopted, a few months later, the Growth Plan for Moldova and the Ukraine Facility. The Growth Plan allocation had the potential to significantly accelerate economic convergence in the Western Balkans, with the prospect of doubling the size of the region's economies over the next decade.

Besides the recent technical measures adopted and political upsides offered by the EU institutions to candidate countries, civil society plays an essential role at the national level, consistently scrutinising, advocating for and driving forward EU-related reforms. CSOs also have engaged in forging relationships and building transnational networks in order to channel the respective national concerns and view points directly to Bruxelles, contributing to the wider enlargement debate. The experience of the Western Balkans shows that CSOs have always been a relevant actor in the EU accession process.⁸

The national institutional mechanisms established to facilitate CSOs participation in the EU accession negotiations have often been shaped by political decisions. At the EU level, the legal frameworks governing the relations between the EU and the enlargement countries have adopted different approaches to the formal inclusion of CSOs.

⁵ European Western Balkans, (2026), Gradual integration should not be a substitute for full EU membership, available at: <https://europeanwesternbalkans.com/2026/09/10/gradual-integration-should-not-be-a-substitute-for-full-eu-membership/>

⁶ Mattinale Europeo, (2026), Nella sala d'attesa dell'Ue si sta troppo comodi, available at: https://substack.com/inbox/post/215533298?utm_source=email&redirect=app-store-no-desktop&inbox=true&utm_campaign=email-read-in-app&triedRedirect=true

⁷ EUCRTA, (2026), New dynamism in the EU enlargement debate: implications for democratic governance and rule of law conditionality. Policy Brief, available at: <https://eucrta.eu/wp-content/uploads/2026/09/EUCRTA-enlargement-non-papers-analysis.pdf>

⁸ Miljenović, R., (2024), The potential of the Growth Plan for the Western Balkans-Recommendations for its implementation and the role of civil society. Civil Society Forum Tirana, available at: https://epi.org.mk/wp-content/uploads/The-Potential-of-the-Growth-Plan-for-the-Western-Balkans_Recommendations-for-Its-Implementation-and-the-Role-of-Civil-Society.pdf

As this analysis shows, the Stabilisation and Association Agreements lack specific provisions dedicated to the CSOs' engagement in the Western Balkans, whereas the Association Agreements, including Deep and Comprehensive Free Trade Areas, provide for specific consultation mechanisms with civil society in the Trio countries. Meanwhile, the recently introduced Growth Plans seek to partially address such gaps by explicitly recognising the importance of CSOs' consultation, while leaving to the member states the relative consultation modalities. Ultimately, the Growth Plans remain temporary political instruments that complement, rather than replace, the Association Agreements governing the enlargement process for the WB.

Against the backdrop of these recent developments, this policy analysis aims to examine the extent to which the civil society organizations are formally recognized as actors within the legal framework governing the relations between the EU and candidate countries. It further explores the CSOs engagement in the newly introduced political initiatives and their attempts to advocate for more leverage at the EU level.

The analysis is structured around three key dimensions of civil society engagement. The first assesses the extent to which cooperation with civil society has been institutionalized within the legal frameworks governing EU relations with the enlargement countries. The second examines the CSOs participation in reform agenda shaping and monitoring under the Growth Plan. The third dimension examines how CSOs use transnational networks and advocacy to secure a stronger role at EU level in the MFF 2028-2034, as the space for civil society at national level shrinks. Overall, although the EU now recognises civil society as a key partner in the enlargement process, this recognition will remain largely symbolic unless it is anchored in institutionalised consultation mechanisms and dedicated, predictable funding that make civil society an effective actor in shaping and monitoring accession-related reforms.

Civil Society Role in the Association Agreements with the EU

The concept of civil society remains broad and heterogeneous, a continuously growing phenomenon that encompasses a diverse range of actors performing multiple and often complementary roles. In a broader perspective, this analysis relies on the EU's understanding of civil society organisations, which include non-profit and independent entities, non-governmental organisations, think tanks, research institutes, universities, organisations representing economic and social interests, professional associations, networks, not-for-profit media and independent foundations, etc.⁹

The formal recognition of the role of civil society in the accession process dates back to the Enlargement strategy and main challenges 2006–2007, where the Commission declared the establishment of the first policy dialogue with civil society organizations based in candidate and potential candidate countries in the Western Balkans.¹⁰

⁹ European Commission, (2022), DG NEAR Guidelines for EU support to civil society in the enlargement region 2021-2027, available at: https://enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027_en

¹⁰ European Commission, (2006), Communication from the Commission to the European Parliament and the Council. Enlargement Strategy and Main Challenges 2006 – 2007. Including an annexed special report on the EU's capacity to integrate new members, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52006DC0649>

It was followed by the establishment in 2008 of the Civil Society Facility, which recognized civil society development as a key priority for EU enlargement and aimed to provide capacity building and technical assistance to CSOs in the WB6 countries.¹¹

The Commission has consistently called on the WB6 to establish inclusive structured dialogues with civil society on EU reform priorities and for the empowerment of civil society.¹² This commitment is also reflected in the revised enlargement methodology, which emphasizes that EU-related reforms should be pursued in a transparent and inclusive manner, with the meaningful CSOs' involvement.¹³ It further recognizes the importance of fostering an enabling environment in which civil society can exercise a stronger and more meaningful role in the reform process.

The Union has also supported the civil society organizations' consultation in the Eastern Neighbourhood countries, through the establishment of institutional mechanisms that facilitate their participation, strengthen structured dialogue, and foster regular exchanges between societal actors and public authorities.¹⁴

Nevertheless, from a comparative perspective, the EU has followed a differentiated approach towards the formalization of the CSOs' role and contribution in the legal framework governing its relations with the WB6 countries vis-à-vis the one with the Eastern Trio countries. As Zeneli and Smolica show, both the SAAs and the AA/DCFTAs can be considered as "comparable in terms of scope [but] differ in their design."¹⁵ A key distinction lies in the respective foundational aspects and in the bilateral institutional mechanisms established under each set of agreements.¹⁶

The SAAs emerged from the Stabilisation and Association Process, launched in the early 2000s, with the aim to promote peace and stability in the Western Balkans, while establishing a credible long-term prospect of EU membership for the region. By contrast, given the fact that the Trio countries historically had not been offered a formal EU perspective, both them and the EU had an interest to explore alternative avenues for strengthening their mutual relations.

¹¹ Wunsch, N., (2018), *EU Enlargement and Civil Society in the Western Balkans*, Palgrave-MacMillan, pp. 25-26, 29-30.

¹² European Commission, (2018), *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A credible enlargement perspective for and enhanced EU engagement with the Western Balkans*, available at: https://eur-lex.europa.eu/resource.html?uri=cellar:d284b8de-0c15-11e8-966a-01aa75ed71a1:0001.02/DOC_1&format=PDF

¹³ European Commission, (2025), *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. EU Strategy for Civil Society*, available at: https://commission.europa.eu/document/download/8c30975d-bc1c-4415-8dcd-a71cb28f3662_en?filename=JUST_template_comingsoon_standard.pdf

¹⁴ Góra, M. & M. Zubek, (2021), *Stuck in ENP purgatory? An assessment of the EU's external legitimacy mechanisms*, EU3D Research Papers No. 12, Oslo: ARENA, cited in Anagnostou, D., (2022), *Countering dominance, enhancing legitimacy? The role of civil society in EU accession in Serbia and the Western Balkans*, EU3D Research Papers, No. 29, Oslo, available at: <https://www.eu3d.uio.no/publications/eu3d-research-papers/2022/eu3d-rp-29-anagnostou.pdf>

¹⁵ Ioannides, I. et al, (2026), *Paving the way to EU enlargement. Assessing economic trends and future prospects*, European Parliamentary Research Service, available at: [https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI\(2026\)774735](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2026)774735)

¹⁶ Zeneli, S. & Smolica, G. (2026), *Pathways to Gradual Integration: A Comparative Analysis of the EU Association Framework*. Re-ACT Lab, available at: https://www.balcanicaucaso.org/wp-content/uploads/sites/8/2026/07/Pathways-to-Gradual-Integration-and-Association-Agreements_Re-ACTLab.pdf

In this context the signing of AAs, followed by the establishment of the DCFTAs in the mid-2010s, paved the way for closer economic and trade cooperation between the parties, while the “more for more” cooperation approach allowed to maximize the benefits associated with gradual access to the EU Single Market.

With reference to the civil society, the Stabilisation and Association Agreements contain no explicit provisions for a formal involvement in the implementation of the related provisions or monitoring. A similar approach is also reflected by CEFTA and in the Working Plan of the Common Regional Market, which do not foresee any formal mechanism of participation or consultation of the WB6 civil society.¹⁷ This is a missed opportunity to make use of the technical knowledge and embedded potential to enhance legitimacy.¹⁸

By contrast, the AA/DCFTAs provide for a dedicated chapter with legally binding provisions on the cooperation with and involvement of civil society.¹⁹ For instance, the EU–Ukraine Association Agreement establishes a Civil Society Platform, which serves to meet, exchange perspectives and gather CSOs’ input on a regular basis. It is tasked to promote the exchange of experience between the parties, facilitate CSOs participation in monitoring the implementation of the agreement, and deepen mutual knowledge and understanding (art. 443). Moreover, the parties commit to foster dialogue and cooperation between civil society stakeholders from both sides as well as facilitate the consolidation of CSOs (art. 444). The platform brings together members of the European Economic and Social Committee (EESC) and representatives of the civil society of Ukraine (art. 469). Moreover, the Civil Society Platform is formally informed of the decisions adopted by the Association Council and, in turn, may submit its own recommendations (art. 470).

Another illustrative example is the EU-Moldova Civil Society Platform, established in May 2016, which brings together 10 members from EESC and European civil society networks representing the EU and 10 representatives of CSOs and social partners from Moldova.²⁰ The Civil Society Forum meets regularly, at least twice a year, and adopts a final joint declaration setting out its positions, concerns and recommendations on the EU accession process, on the reforms related to the EU fundamentals’, economic criteria and other policy areas. In the last two meetings, the EU-Moldova Civil Society Platform has expressed its positions regarding the implementation of the Growth Plan and its involvement in the consultation and monitoring process.

¹⁷ Steinbach, A., (2024), The rocky road to EU accession for Western Balkan countries: Obstacles and lessons from the Eastern Partnership, Working Paper, Bruegel, p.19, available at: <https://www.bruegel.org/system/files/2024-03/WP%20Western%20Balkans%20270324%23.pdf>

¹⁸ Ibid.

¹⁹ Association Agreement between the European Union and Ukraine, available at: https://eur-lex.europa.eu/eli/agree_internation/2014/295/oj/eng

²⁰ For more information, please consult: <https://www.euromonitor.md/en/rm-eu/#a2>

Societal Ownership of the Growth Plan in the Balkans and Moldova

The Growth Plan for the Western Balkans was launched in November 2023 and entered into force in May of the following year. Building on this experience, the Commission subsequently proposed the Growth Plan for Moldova, which came into force in March 2025. The plan provides for pre-accession financial assistance to candidate and potential candidate countries, supporting their gradual integration in specific sectors of the EU single market. A similar pivotal facility has also been established for Ukraine to address the multifaceted challenges arising from Russia's war of aggression.

The financial envelope of the Reform and Growth Facility for the Western Balkans amounts to 6 billion euros (in grants and loans), for Moldova's worth up to 1.9 billion, whereas Ukraine Facility is worth 50 billion. The RGF is designed to support economic convergence of these countries, while complementing and reinforcing the financial assistance provided to WB6 under IPA III. The instrument employs a results-based payment mechanism, which implies a gradual and conditional approach to the disbursement of the funds. The envisaged conditionality clauses are intended to function as leverage to encourage the implementation of domestic policy reforms.²¹

In its initial communication addressed to the EU institutions, the Commission did not make any reference to the role envisaged for civil society within the framework of the Growth Plan.²² Nevertheless, a few months later, the regulation establishing the RGF for the Western Balkans explicitly recognized a role for CSOs and social partners. In line with the principle of inclusive partnerships, the regulation assigned to the Commission the duty to ensure for their involvement in the consultation process, including timely access to all relevant information, with a view to enabling their contribution to the design and implementation of the programmes, as well as to the monitoring phase.²³

Moreover, it provides for the close involvement of CSOs in the preparation of the Reform Agenda by each beneficiary country and for their contributions to be duly reflected therein. Among its specific objectives, the Regulation places particular emphasis on ensuring public access to information, public scrutiny, transparency and accountability, as well as involvement of civil society in the decision-making processes.

From its perspective, the Commission considers CSOs involvement in the Reform Agenda a priority under the Reform and Growth Facility, while leaving the extent of their involvement to national authorities. A similar participatory process is foreseen also for Moldova as well as for Ukraine Facility Regulation.²⁴

²¹ Steinbach, op.cit.

²² European Commission, (2023), Communication new Growth Plan for the Western Balkans. See more at: https://enlargement.ec.europa.eu/2023-communication-new-growth-plan-western-balkans_en

²³ Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401449

²⁴ Follow-up from the Commission INT/1058, op.cit.

In practical terms, however, civil society participation in reform agenda shaping and monitoring the Growth Plan implementation across the Western Balkans and Moldova remains uneven and fragmented, with varying levels of involvement across countries. As noticed by a local think tank, there continues to be a clear paradox in the region, as the enthusiasm for EU integration process across the civil society coexists with limited institutionalised consultation mechanisms and uneven opportunities for a meaningful policy dialogue.²⁵

The CSOs across the Western Balkans have engaged at national and regional level in the monitoring the implementation of national Reform Agendas under the EU Growth Facility thanks to EU funding and private donor support. Three parallel initiatives are currently running. The WB Reform and Growth Monitor is a regional project implemented by a network of six CSOs, aimed at enhancing transparency, promoting inclusive policy dialogue, and strengthening participatory processes.²⁶ Running until the end of 2027, the project provides an online regional platform for tracking progress in the implementation of national Reform Agendas, complemented by regular monitoring reports.

The second project, funded by the Swiss Government, is being implemented in Albania, where a Reform Tracker has been developed to enhance transparency, strengthen public oversight, and facilitate civic engagement in monitoring reform implementation.²⁷

The last initiative, the National Consultative Mechanism for the Reform Agenda (N-CoMRa), is supported by the Ministry of European Affairs in North Macedonia and serves as a national platform for transparent and inclusive policy dialogue, bringing together more than 150 civil society organisations.²⁸

The inadequate financial support and limited institutionalised funding mechanisms constrain civil society's capacity to perform their watchdog and oversight functions, adversely affecting the safeguarding of civic space, hence undermining the legitimacy and public credibility of reforms.

Evidence emerging from monitoring reports across the Western Balkans suggests that CSOs engagement in the consultative and monitoring processes underpinning the EU Growth Facility is fragmented and varies across countries, limiting their effective capacity to contribute to the policy dialogue and oversight.

Several countries have missed the opportunity to institutionalise cooperation mechanisms with CSOs, excluding the citizens' perspectives in this process.²⁹ For instance, in the case of Albania, the invitation of CSOs in the meetings of the RGF Monitoring Committee has been done on an ad hoc basis.

²⁵ Cooperation and Development Institute, (2026), Main conclusions of the conference 'Reflecting on Reform Agenda achievements and exploring future opportunities', Tirana, available at: <https://cdinstitute.eu/2026/02/13/conference-reflecting-on-ra-achievements/>

²⁶ For more information, please consult: <https://reform-monitor.org/>

²⁷ For more information, please consult: <https://cdinstitute.eu/scoreboard-albania/>

²⁸ For more information, please consult: <https://epi.org.mk/post/33373?lang=en>

²⁹ Prroni, D., (2026), Reform Agenda Update - Reform Monitor Albania - 2nd semester 2025, Institute for Democracy and Mediation, available at: <https://reform-monitor.org/albania-reform-agenda-update-2nd-semester-2025/>

Although two organizations have been offered the possibility to make interventions, still CSOs participation remains unregulated and with limited access to preparatory materials, directly affecting CSOs' ability to engage meaningfully in the process.³⁰ In a joint statement addressed to the Albanian institutions in early spring 2026, 124 CSOs and media outlets highlighted the limited institutionalisation of civil society participation in policy-making and legislative processes in the frame of EU accession process, an insufficient enabling environment for their engagement, and the absence of a clear institutional approach to supporting civil society development.³¹

Meanwhile in North Macedonia the participation of civil society in the RGF Monitoring Committee has been formally ensured, although on an invitation-based approach and without any membership status or opportunity to contribute to the agenda-setting process.³² In this regard, the invitation-based approach towards the CSOs has been criticised as it determines who is invited or excluded from participation,³³ piloting therefore the course of the debates. Such practices risk reducing CSOs participation to a mere procedural step rather than a genuine and meaningful contribution and ownership to the EU reform processes.

In Moldova, public authorities have demonstrated openness to consultations with civil society in the frame of the Reform Agenda.³⁴ However, the EU-Moldova Civil Society Platform still calls on the national authorities to further develop the ad hoc consultation processes into permanent and institutionalised mechanisms, including through the formalisation of feedback provided by public authorities.³⁵

By contrast, in Serbia, against the backdrop of fragmented relations between civil society and state authorities, the involvement of the European Commission has facilitated the establishment of a tripartite dialogue, leading to the participation of a civil society representative in the RGF Monitoring Committee meetings with full speaking and voting rights.³⁶ The CSOs' representative is elected by the National Convention on European Union—the country's largest civil society coalition.

Another important factor refers to the limited access to public information, traceability of data, systematic publication of official documents, robust reporting, payment requests and other relevant materials, which undermines transparency, accountability, citizens' confidence as well as limits CSOs' effective contribution to consultative meetings and external scrutiny.

³⁰ Ibid, 29.

³¹ National Resource Center for Civil Society in Albania, (2026), Joint statement of civil society organizations in Albania. See more at: <https://resourcecentre.al/joint-statement-of-civil-society-organizations-in-albania/>

³² Tair-Selmani, T. (2026), Reform Agenda Update - Reform Monitor North Macedonia - 2nd semester 2025, European Policy Institute - EPI, available at: <https://reform-monitor.org/north-macedonia-reform-agenda-update-2nd-semester-2025/>

³³ Ibid.

³⁴ European Economic and Social Committee, (2026), Civil Society's Role in Supporting Reform under the Growth Plans for the Western Balkans and Moldova, as well as in Ukraine's Reform Path, Explanatory Opinion, REX/612-EESC-2026, available at: <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/civil-societys-role-supporting-reform-under-growth-plans-western-balkans-and-moldova-well-ukraines-reform-path>

³⁵ EU-Moldova Civil Society Platform, (2026), Joint Declaration - 17th meeting in Chisinau, available at: https://www.eesc.europa.eu/sites/default/files/2026-04/eesc-2026-01116-01-00-tcd-edi_-_clean-1.pdf

³⁶ Todorović, M., (2026), Reform Agenda Update - Reform Monitor Serbia - 2nd semester 2025, CEP, available at: <https://reform-monitor.org/serbia-reform-agenda-update-2nd-semester-2025/>

As stressed also by the EESC in an opinion issued on civil society's role in supporting reforms under the Growth Plans, the time constraints and strict deadlines should not preclude access to information and undermine democratic standards and procedures.³⁷ Otherwise, civil society consultation risks becoming a largely pro forma exercise, leading to governance and accountability deficits. Furthermore, the EESC recognizes that to-date the CSOs consultation practices across the Balkans, Moldova and Ukraine remain still insufficiently documented, limiting the assessment of their impact.³⁸

Overall, adequate funding, institutionalised consultation mechanisms and strengthened civil society capacities across the Western Balkans and the Trio countries would contribute to more inclusive, transparent, and effective EU integration processes. These measures would bridge the existing gap and contribute to strengthening of the implementation and monitoring of reform agendas, improving the quality of public policies, and enhancing accountability and citizen engagement.

Civil Society Transnational Networking and Advocacy at EU Level

Over the years, civil society organizations in the enlargement countries have increasingly invested in strengthening transnational networks with regional and European counterparts and developing independent advocacy initiatives aimed at engaging policy- and decision-makers at EU level. To some extent, the EU funding mechanisms have played a role in this direction, by fostering transnational cooperation by stimulating the formation of cross-border consortia, creating new opportunities for CSOs to build partnerships and engage in joint policy-oriented initiatives.

Interactions between transnational civil society networks and EU institutions in Brussels have intensified over time, with advocacy initiatives contributing to policy developments across a range of policy areas. Within the scope of this policy analysis, two notable examples illustrate the added value of civil society engagement at EU level with respect to the ongoing enlargement related developments. These examples serve to illustrate the capacity of the CSOs, based in enlargement countries, to draw on context-specific expertise and knowledge to develop innovative policy solutions, foster active citizenship and contribute to policy-making processes, besides their complementary role in the shaping and monitoring of policies' implementation at national level.

The first illustrative example is the joint advocacy proposal launched by the European Policy Center (CEP-Belgrade) and the Centre for European Policy Studies (CEPS-Brussels) which put forward a model for the staged accession of the Western Balkans to the EU. The proposal aims to address key challenges affecting the enlargement process while providing a more gradual and credible pathway towards EU membership, leading to a reinvigorated accession process.³⁹

³⁷ European Economic and Social Committee, (2026), op.cit.

³⁸ Ibid.

³⁹ Emerson, M. et al (2022), A template for staged accession to the EU, European Policy Center Belgrade and Centre for European Policy Studies, available at: <https://cep.org.rs/wp-content/uploads/2023/01/A-Template-for-Staged-Accession-to-the-EU.pdf>

In particular, the proposed model placed an emphasis on the socio-economic dimension of the WB6 integration process, arguing for increased EU financial support to candidate countries to narrow down their existing gaps with EU Member States.⁴⁰ The model subsequently contributed to the policy debate on gradual integration and provided a relevant input for the approach endorsed by the European Council in 2022. It was later on followed by the launch of the EU's Growth Plan for the Western Balkans and the Reform and Growth Facility, which translated some aspects of staged accession into a framework for additional financial support and reform-based integration.

A second key area of policy engagement concerns the Global Europe instrument proposed under the forthcoming Multiannual Financial Framework 2028–2034. As elaborated in chapter 2 of this report by Raffaella Coletti, this new instrument is expected to directly affect the Union's external action and funding priorities, and particularly for what concerns civil society support in the enlargement countries. The proposed regulation establishing the Global Europe instrument builds on the principle of inclusive partnership, drawing on the experience of the RGF. It explicitly calls on the Commission to ensure that CSOs are consulted and have access to relevant information, enabling them to participate meaningfully in the design, implementation, and monitoring of programmes and actions under this instrument.⁴¹

As MFF negotiations enter a new phase under the Irish Presidency of the Council -expected to help bridge diverging positions among Member States-, several transnational civil society networks have publicly called for enlargement and its associated financial envelope to be established as a core priority within the Global Europe instrument. They have also advocated for the inclusion of appropriate funding mechanisms and safeguards that would allow civil society to meaningfully contribute in the shaping, implementation and oversight of EU reform processes.

In October 2025, a transnational coalition of 46 CSOs from the Western Balkans, Moldova, and Ukraine submitted a joint appeal to the European Parliament and EU Member States, calling for the establishment of a dedicated “enlargement” budget envelope within the Global Europe instrument to support the integration of these countries.⁴² The coalition proposed a dedicated “pre-accession transition” budget line to bridge the gap between the negotiation phase and EU membership, a phased approach to accessing cohesion funds, and the inclusion of civil society in pre-accession funding processes. From the coalition's perspective, the future IPA IV instrument should combine the strengths of previous IPA programmes with the performance-based approach introduced through the RGF.

⁴⁰ Chiodi, L. & G. Madhi, (2026), Western Balkans, strong institutions needed to fight corruption, Osservatorio Balcani Caucaso Transeuropa, available at: https://www.balcanicaucaso.org/en/cp_article/western-balkans-strong-institutions-needed-to-fight-corruption/

⁴¹ Proposal for a Regulation of the European Parliament and of the Council establishing Global Europe, COM/2025/551 final, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025PC0551>

⁴² Europe Plus, (2025), 46 Civil Society Organisations Call on the EU to Embed Enlargement in the Next. A Joint Appeal to the European Parliament and EU Member States, available at: https://europe-plus.com/wp-content/uploads/2025/10/EC_Joint-letter_enlargement-in-MFF-20282034.pdf

A second open letter to the EU institutions was issued by the Balkan Civil Society Development Network (BCSDN) in April 2026, calling for a distinct budgetary priority for enlargement, with dedicated and predictable allocations for civil society.⁴³ The proposal highlights a broader policy concern, namely without dedicated resources and appropriate safeguards, civil society risks remaining a peripheral stakeholder in the enlargement process, despite its recognized role in monitoring reforms and strengthening of transparency and accountability.

As negotiations on the MFF 2028–2034 continue, the Irish Presidency is expected to present a revised negotiation package in mid-October 2026. At this stage, it remains uncertain to what extent the recommendations put forward by civil society networks from the enlargement countries will be reflected in the emerging framework. However, the EU's recognition of civil society as a key partner in the implementation of accession-related reforms represents an important footprint. The next stage should be supported by adequate financial resources, alongside formal participation and institutionalisation mechanisms that can help reduce the risks of politicisation and ad hoc practices by national authorities.

Conclusions

This policy analysis has shown that over the decades the EU policy towards the civil society's engagement has evolved, recognizing it as a partner in the enlargement process. However, the situation still differs at national level, where the CSOs engagement in EU related reforms remains uneven, largely political and weakly institutionalised.

The comparison between the legal frameworks governing EU relations with the Western Balkans and with the Associated Trio shows that the EU has followed a different approach regarding CSOs engagement. While the Association Agreements and DCFTAs with the Associated Trio countries contain binding provisions and dedicated Civil Society Platforms. The Stabilisation and Association Agreements with the WB6 do not foresee any formal role for CSOs in implementation or monitoring. This gap deprives the region of technical expertise and of the legitimacy that structured civil society involvement could bring to the accession process.

The Growth Plan for the Western Balkans and the Reform and Growth Facility partially address this gap by explicitly acknowledging the importance of consulting CSOs in the design, implementation and monitoring of reform agendas. In practice, however, the modalities are left to national authorities, and the results are fragmented. Serbia, where EU involvement enabled a CSO representative to sit on the RGF Monitoring Committee with full speaking and voting rights, stands at one end. Ad hoc and invitation-based practices, as in Albania and North Macedonia, stand at the other. Such arrangements risk turning participation into a formality, since national authorities decide who is invited and what is discussed. Limited access to information, tight deadlines, insufficient funding and poor documentation of consultation practices further constrain the capacity of CSOs to exercise their watchdog function. As the Growth Plans are temporary political instruments, they cannot by themselves substitute for a lasting legal and institutional basis for civil society engagement.

⁴² Balkan Civil Society Development Network, (2026), Enlargement and Civil Society in the 2028–2034 MFF: Call for Safeguards, Participation and Dedicated Funding, available at: <https://balkancsd.net/novo/wp-content/uploads/2026/04/MFF-Letter.pdf>

Civil society has nonetheless proved to be a proactive actor. National and regional monitoring initiatives, such as the WB Reform and Growth Monitor, Albania's Reform Tracker and North Macedonia's N-CoMRa, show a willingness to fill accountability gaps, often thanks to external donor support. Furthermore, the joint appeals of the CSOs from the Western Balkans demonstrate once more their interest in bridging the direct communication with EU institutions and advocate on specific policy issues. In the frame of the next MFF, through the joint appeals, the CSO coalitions aim to secure a dedicated enlargement envelope and predictable funding for civil society in the Global Europe instrument. Whether these demands will be reflected in the upcoming MFF remains still uncertain, but they show that civil society is seeking to shape the framework and not merely to react to it.

The EU should consider alternative ways to embed the civil society consultation in the legal framework governing its relations with the Western Balkans, drawing on the experience of the Civil Society Platforms under the AA/DCFTAs for the Associated Trio. Building on the experience of the consultations held under the Growth Plans, there should be assessed the opportunities to set some minimum standards for CSOs consultation in the future Global Europe instrument, covering timely access to documents, transparent selection criteria and formal feedback on the contributions received, so that participation does not depend on the goodwill of national governments. The systematic documentation of the consultation practices in the enlargement countries would further allow for the assessment of the impact of the civil society engagement.

Moreover, dedicated and predictable funding for civil society should be secured both in the next MFF and in the national budgets of the enlargement countries. Only in this way, the civil society organizations can sustain the monitoring of reforms and advocacy activities beyond the length of individual projects or one-off initiatives.

Ultimately, gradual integration and the Growth Plan can accelerate convergence, but their credibility depends on transparent, accountable and inclusive reform processes. Without institutionalised civil society participation and adequate resources, civil society risks remaining a peripheral stakeholder in a process whose success depends on society-wide ownership of the reforms.



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