IPA III CIVIL SOCIETY CONSULTATION FEEDBACK REPORT

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List of Abbreviations

ADA	Austrian Development Agency
ADRA	Adventist Development and Humanitarian Work
ADRF	Albanian Disability Rights Foundation
BCSDN	Balkan Civil Society Development Network
BOS	Belgrade Open School
CBC	Cross-Border Cooperation
CSF	Civil Society Facility
CSO	Civil society organization
CSO-LA	Civil society organizations-Local authorities
CZKD	Centre for Cultural Decontamination
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
EC	European Commission
EU	European Union
EUD	European Union Delegation
FOSM	Foundation Open Society- Macedonia
GADC	Gender Alliance for Development Centre
GBWN	Gender Budget Watchdog Network
GONGO	Government NGOs
HR	Human rights
IDC	Initiative for Development and Cooperation
IPA	Instrument for Pre-accession Assistance
KCSF	Kosovar Civil Society Foundation
KoRSE	Coalition for Development of Social Economy
KRCT	Kosovo Rehabilitation Centre for Tortured Victims
KWN	Kosovo Women Network
MOSHA	Macedonian Occupational Safety and Health Association
NALAS	Network of Local Authorities in South-East Europe
NGO	Non-governmental organization
NRC	National Resource Centre
NSA	Non-state Actor
NUNS	Independent Journalist Association of Serbia
OECD	Organisation for Economic Co-operation and Development
OSCE	Organization for Security and Co-operation in Europe
PAR	Public Administration Reform
PONGO	Political NGO
RAE	Roma, Ashkali and Egyptians
RCC	Regional Cooperation Council
RYCO	Regional Youth Cooperation Office
SEA	Secretariat for European Affairs
SEKO	Sector Civil Society Organizations
SGBV	Sexual and gender-based violence
SIDA	Swedish International Development Agency
TA	Technical Assistance
TACSO	Technical Assistance to Civil Society Organizations
TUSEV	Third Sector Foundation of Turkey
WBF	Western Balkan Fund
WBT	Western Balkans and Turkey
WWF	World Wide Fund for Nature

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EXECUTIVE SUMMARY

The proposal for IPA III Regulation was published on 14 June, 2018. The initial design of the IPA III has been presented at the Western Balkans and Turkey Regional Civil Society Forum, which took place between 21-23 January, 2020 and served to launch the general on-line consultation on IPA III design facilitated by the Technical Assistance to Civil Society Organizations (EU TACSO 3) project. The consultation was addressed to civil society in the Western Balkans and Turkey. The initial deadline for submission of written contributions was Monday, 2 March, but due to great interest, the deadline was extended till Monday, 9 March, 2020. During the consultation, 54 contributions were received from both regional networks and individual organizations from Beneficiary country representing at least 4689 of their individual members or organizations. This report takes stock of the contributions received and presents the key trends that have emerged from the qualitative and quantitative analysis of the responses. It includes both the analysis of overall contributions as well as responses under the 4 specific questions addressed within the consultation.

Respondents identified many **thematic issues** and priorities that to them are missing in the current IPA III proposal or need to be better reflected in terms of their prioritization and approach. In some cases, the proposal includes both suggestions to add new topics and issues as well as make some of them a reflected as cross-cutting issues in all windows. The following are proposed themes that need to be prioritized: gender equality and gender mainstreaming; children's rights and youth, anti-discrimination and support to human-rights based approaches in reform processes including disabilities rights; migrations (both refugees and brain-drain related); environment and European Green Deal agenda; social service delivery; education; employment; social economy; resilience and sustainability as well as inclusion of local authorities; issues of civil society and shrinking civic space as well as media freedom.

Country specific topics, reflecting the particularities of the context point to the need for IPA III to be more **sensitive to local needs**. In Albania, the recent face-off with natural disasters (earthquake, floods) prompts the suggestion to expand the approach to resilience beyond that of climate change. Also, the importance of IPA III to support interventions related to the improvement of vulnerable groups and the reform of the social service system is put forward. Due to the complex system, approach which would harness local level and cross-entity cooperation is deemed crucial for Bosnia and Herzegovina. In Kosovo, support to priorities linked to employment and prevailing consequences of conflict (war and sexually-based violence victims) is deemed important. In Montenegro, issues related to improvement of social and health services as well as environment were prioritized. In North Macedonia, a multitude of topics is suggested, including importance of heath; media development and freedom; human-rights based approach and anti-discrimination actions as well as rural development and work safety. Similarly, in Serbia, respondents have suggested prioritization of numerous themes such as brain drain and youth emigration; support to vulnerable groups, including refugees; education, employment and social economy; environment and energy efficiency; community engagement activities; freedom of media and freedom of information; culture and arts etc. In Turkey, child-rights' perspective, youth issues and the need to mainstream rights-based approach as a cross-cutting issues in IPA III framework were prioritized.

Respondents consider the value of **civil society involvement in IPA III** crucial and important for **all phases**, including in further IPA III Regulation and framework design and IPA III programming, implementation, monitoring and evaluation. Based on lessons-learned from participation to IPA I and IPA II implementation as well as best practices from EU Cohesion and other Funds, a set of concrete recommendation is put forward. These include: the need for **meaningful inclusion of civil society** and other stakeholders in all steps of the IPA III process, **clear structures** and **process** for their involvement

and **feedback loops** to ensure suggestions are taken on board in the preparation and implementation of future IPA III funds. Moreover, there is the expectation that **funding support to civil society is not part of Strategic response process**, which is understood as a mechanism whereby IPA modalities are negotiated and defined between the EC and Beneficiary country, or when it pertains to civil society involvement, it is at least separated from government involvement and driven by civil society and its needs.

While continuing to support civil society activities through **a separate facility** – such as the current Civil Society Facility - respondents also propose funding **re-allocation** from government to civil society in cases of democratic backsliding and shrinking civic space. Similarly, **centralized management** of such support through Commission services should be continued. Civil society involvement and support should be **mainstreamed** in all Strategic responses and consequent projects funded by IPA III. Further **adjustments in funding modalities** are needed in order to respond to civil society capacities, especially those working with **service-provision**, while for **gender and women organizations** a separate allocation should be earmarked.

In country specific contributions, respondents stress the importance of continued support to **local, grass-root** and **rural civil society**, for which both **institutional grants** and **simplified financial** and **administrative modalities** are essential to access EU funding. Since the current IPA III proposal envisages access to IPA funds on competitive basis, respondents stress that civil society support should **not be conditioned on Beneficiary country performance**. Moreover, the **use of data gathered by CSOs** through EU-funded projects, especially for maturity assessment of Strategic response could be beneficial. Finally, **improvement of indicators in EU Civil Society Guidelines** to which the civil society support under IPA III should be linked is needed for an effective monitoring and capacity building of CSOs.

Finally, other issues that need to be considered in further IPA III design include: the importance of **flexibility** in the approach to IPA III implementation; concerns about the **public institutions capacities** and **accountability** when managing EU funds; the need to further clarify the link between **negotiations frameworks** and IPA III; and the need for **continued involvement** and **consultations** with **local stakeholders** on final IPA III design and built on the current on-line consultation process.

1. INTRODUCTION

The Instrument for Pre-accession Assistance (IPA) is a financing instrument of the European Union (EU), through which the EU supports reforms in the Enlargement region that includes Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia and Turkey. IPA funds build up the capacities of the Beneficiaries throughout the accession process, resulting in progressive, positive developments in different sectors such as public administration reform (PAR), rule of law, sustainable economy, agricultural and rural development. For the period 2007-2013, IPA had a budget of some € 11.5 billion; its successor, IPA II, built on the results already achieved by dedicating € 11.7 billion for the period 2014-2020. IPA III will succeed IPA II and will start of implementation in 2021 for the next EU budget cycle until 2027. Currently, the European Commission (EC) is working on the preparation of IPA III based on the lessons-learned during IPA I and IPA II implementation and is consulting the relevant stakeholders, including civil society organisations (CSOs). Such consultations are based on the proposal of the EC for IPA III Regulation[2], which was published on 14 June, 2018 and do not prejudge the final Regulation, which will be adopted following trilogues with the Council and the European Parliament[3].

Implementation of most of the key reform processes in the Western Balkans and Turkey (WBT) are supported through IPA funds. Civil society is active in many fields and has everyday experience with the way in which IPA funds are being utilized for the benefits of the reform process. This means that CSOs have direct knowledge and experience on how IPA funds change everyday life of citizens and what are the lessons-learned to improve IPA funds programming and management.

One of the key programmes funding civil society activities within IPA during programming periods 2007-2013 and 2014-2020 is the Civil Society Facility (CSF). During the ongoing programming period 2014-2020, IPA resources of approximately € 340 million have been channelled through the CSF and supporting more than 200 projects across the Enlargement region. CSOs implementing actions under the CSF have direct experience in managing and absorbing IPA funds. This means that CSOs are direct implementers of EU funds and therefore have first-hands experience of e implementation of IPA from a programming, management, reporting and evaluation standpoint.

> *Participating to IPA III consultation allowed CSOs to share their views on how IPA funds are implemented by public institutions at central and local level in their areas of work. Through knowledge and hands-on experience with management of IPA projects shared through this consultation, civil society contributes to the improvement of effectiveness and efficiency in utilization of IPA funds in the next EU budget cycle.*

CONSULTATION PROCESS

The initial design of the IPA III has been presented to over 112 representatives of civil society, public authorities and other stakeholders from the region at the Western Balkans and Turkey Regional Civil Society Forum, which took place between 21-23 January, 2020. The event served to launch the general consultation on IPA III design facilitated by the Technical Assistance to Civil Society Organizations (EU TACSO 3) project. The video of presentation on IPA III was made available at the project website[4] alongside 4 questions to facilitate the formulation of suggestions, comments and recommendations.

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*This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

[2] https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-pre-accession-regulation_en.pdf

[3] More information on IPA instrument is available here: https://ec.europa.eu/neighbourhoodenlargement/instruments/overview_en

[4] http://tacso.eu/have-your-say-in-preparing-ipa-deadline-extended-monday-9-march-2020/

A specific electronic e-mail address was made available to send questions (Micol Eminente at Micol.EMINENTE@ec.europa.eu) and another to receive the input (welcome@tacso.eu).

The four (4) questions posted were:
1. Do you think that there are thematic priorities or other important elements missing in the proposed structure of the programming framework?
2. Do you have any specific suggestions in relation to the process of preparation of the Strategic response by IPA III beneficiaries?
3. Do you have any specific suggestions relating to how support of civil society is reflected in the programming framework?
4. Do you have any other comment or suggestion?

The consultation was addressed to civil society in the WBT, but especially organizations working with public authorities or implementing EU-funded projects under the current IPA instruments, sectoral or thematic networks and any other interested civil society actor.The initial deadline for submission of written contributions was Monday, 2 March, but due to great interest, the deadline of the consultation was extended till Monday, 9 March, 2020. This report takes stock of the contributions received and presents the key trends that have emerged from the qualitative and quantitative analysis of the responses. It included both analysis of overall contributions as well as responses under the 4 specific questions.

2. RESPONDENTS' PROFILE

During the consultation, 54 contributions were received, out of which 51 from organizations or networks and further 3 from individuals. In terms of geographical distribution, 3 contributions were received from Albania, 6 from Bosnia and Herzegovina, 6 from Kosovo*, 7 from Montenegro, 7 from North Macedonia, 8 from Serbia, 8 from Turkey, 8 from regional networks and organization and 1 from individual without specifying where they are from. Combined, the 54 contributors represent 4675 of their individual members or organizations, all of which have provided their input through written comments, opinions and recommendations for further elaboration of IPA III design.

3. RESULTS

3.1.   THEMATIC PRIORITIES

Respondents identified many **thematic issues** and priorities that to them are missing in the current IPA III proposal or need to be better reflected in terms of their prioritization and approach. In some cases, the proposal includes both suggestions to add new topics and issues as well as make some of them reflected as a cross-cutting issue in all Windows. The following are proposed themes: gender equality and gender mainstreaming; children's rights and youth, anti-discrimination and support to human-rights based approaches in reform processes incl. disabilities rights; migrations (both refugees and brain-drain related); environment and European Green Deal agenda; social service delivery; education; employment; social economy; resilience and sustainability as well as inclusion of local authorities; issues of civil society and shrinking civic space as well as media freedom.

The bellow analysis of suggested themes first presents summary of proposals contributed from regional networks and organizations, followed by contributions from CSOs and individuals who contributed themes and topics that are from their perspective important for individual Beneficiary countries. The full proposals from each contributor are referenced and available upon request.

Gender equality and mainstreaming[5]

There should be a requirement, whereby all future IPA III financed projects should have a gender equality specific objective and allocate 10-20% of project finances towards implementation of that objective. Moreover, in the thematic priority employment, the widespread prevalence of gender-based discrimination in employment should be better reflected in how IPA III facilitates addressing this, including interventions to promote equal opportunities in employability and productivity, diminish discrimination based on gender, age, ethnicity, sexuality and/or ability, adapt workers and enterprises to change, establish a sustainable social dialogue and moderniz and strengthen labour market institutions, including public employment services and labour inspectorates.

Civil society[6] is offering partnership in developing a gender monitoring tool that the EC and EUDs could use when assessing projects. Based on experiences of other development agencies (e.g. OECD, OSCE, SIDA, ADA), the tool would feature indicators used to determine if the project is to transform gender relations, respond to different needs of women and men or be neutral to gender inequalities. According to the proposal, gender indicators are to be linked with a weighing system of proposals, where the gender transformative proposals would be ranked higher than those that are gender specific.

Child-rights perspective, including children on the move [7]

It is suggested that child-rights perspective needs to be included across thematic Windows 1, 2, 3 and 4. There is the need to incorporate child participation as a key element into IPA III in order to address uneven or poor implementation of the existing legal frameworks and policies, budgets data collection and analysis. Particularly, these affect children with disabilities, Roma, Ashkali and Egyptian (RAE) communities (specifically in Kosovo) or refugee and migrant children.

Having in mind the protection challenges for thousands of refugee and migrant children arriving to or staying in the Balkan countries, it would be more impactful to have a separate protection-focused sub-theme of responding to the needs of refugees and migrants. The sub-theme on migration and border management implies the strengthening of the border management procedures and could have less of a focus on working to improve the compliance with the European standards of reception, processing and asylum.

Environment and a holistic approach to improving rule of law (European Green Deal)[8]

The issues of prevention and reversal of the loss of biodiversity in the region and human rights (HR)-based approach to conservation should be included among priorities. These should be reflected in Window 1 (Rule of Law): specific recognition should be made for the topic of *environmental crime* (e.g. wildlife crime, wildlife trafficking, illegal use of natural resources), Window 2 (Good governance): promotion of good governance should also include *environmental democracy*, meaning participative and transparent governance in the sphere of natural resources decision-making including all interested stakeholders, especially local communities and civil society organisations and Window 3 (Green Agenda): specific provision should be made for *biodiversity conservation and reversing the loss of biodiversity,* as well as *nature based solutions.* In addition, IPA III should explicitly promote biodiversity conservation to support development of climate change resilience through improved ecosystem health across the region.

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[5] See GBWN and KWN and a group of women organizations contribution for details.
[6] See GBWN contribution for details.
[7] See Save the Children contribution for overall and country-specific recommendations.
[8] See WWF Adria contribution for detailed recommendations.

Social services[9]

Stronger focus on social services is missing and needs to be tackled within Window 4 (Competitiveness and inclusive growth*)* by connecting community development, civil society sector and social inclusion. Through support to thematic networks, all related five cross-cutting themes (climate change, civil society, gender, rights-based approach, public administration reform on the local level meaning social procurement, involvement in policy process regulating social service sector) can be addressed. Two main sub-themes, should be reflected in the framework: 1) service delivery (improving the quality of the social services, accreditation/licensing of the services, along with stronger coordination to the public institutions in charge for the service delivery, capacity building of CSOs social service providers); and 2) community resilience and social cohesion through the CSOs' networking activities, direct actions in the local communities and awareness raising campaigns.

Social economy[10]

Support the development of social economy, having in mind that the cross-cutting nature of social entrepreneurship, which incorporates aspects of economy, social and labour market inclusion, sustainable development, environment, agriculture, innovation, supporting social entrepreneurship development will contribute to Window 4 (Competitiveness and inclusive growth).

Civil society and shrinking civic space[11]

While civic space challenges vary according to particular national contexts, the trend toward restricting civic space should be considered as crucial. CSOs' resilience is very important to endure the pressure of public institutions and funding constraints. Support to civil society should be mainstreamed in all areas.

Need for increased importance to the local and regional authorities and their role[12]

Local authorities, local government associations alongside CSOs are natural partners in promoting and safeguarding local democracy (Window 1), enhancing governance (Window 2), nurturing active citizenship and ensuring sustainable local development. They can allow for a bottom-up approach and partnership and cooperation in implementation of IPA III. IPA III can build upon programmes such as CSO-LA. Window 5 (Territorial and Cross-Border Cooperation) with only 5% allocation needs to be increased and local authorities need to be involved as both stakeholders and beneficiaries of the accession process. In this context, decentralization along with PAR as cross-cutting/mainstreaming themes of IPA III would stress the importance of strategic partnership in shared responsibility between CSOs and local authorities.

Albania

In Albania, respondents confirmed the importance of <u>gender mainstreaming</u>[13] and <u>social economy</u>[14] as themes for future support under Window 4 (Competitiveness and inclusive growth). Importance of social economy was highlighted due to its cross-cutting nature incorporating aspects of economy, social and labor market inclusion, sustainable development, environment, agriculture, innovation etc.. Given the recent earthquake in Albania and floods in previous years, the next proposal is to expand the approach to <u>resilience beyond only climate change</u>[15], i.e. Objective 2 (Resilience to climate change) within Window 3 should be expanded to "Mitigation of and resilience to climate change and other natural hazards/disasters" to enable support for developing further preparedness and mitigation of

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[9] See IRIS Network contribution for details.
[10] See Save the Children contribution for details.
[11] Ibid.
[12] See NALAS contribution for details.
[13] See GDAC contribution for details.
[14] See NRC Albania contribution by 13 organization for details.
[15] See Save the Children contribution for details.

such events. Similar to gender perspective, <u>disability perspective and rights</u>[16] needs to be considered as one of the critical cross-cutting issues under each thematic Window with direct reference and correlation to Sustainable Development Goals (SDGs)[17].

Similar as in the regional proposals, the need to strengthen the theme of <u>shrinking space for civil society</u>[18] and especially resilience of civil society and increase importance and budget under Window 5 (Territorial and Cross-border Cooperation for the regional development) were also highlighted. <u>(Social) service delivery</u>[19], i.e. improving the quality of the social services, accreditation/licensing of the services, along with stronger coordination with public institutions in charge of the service delivery, capacity building of CSOs social service providers and <u>community resilience and social cohesion</u> through the CSOs' networking activities, direct actions in the local communities and awareness raising campaigns were also raised as important theme to be prioritized.

Bosnia and Herzegovina

Similarly, strengthening and mainstreaming of <u>gender equality</u>[20] at all levels (funding, indicators, thematic priorities such as employment etc.) in IPA III is stressed. The proposal is to include basket funding for gender-related activities; training implementing partners on the gender toolkit to build capacity in relation to cross-cutting priorities; follow-up on project proposals that do not meet checklist/screening criteria; and integrating gender indicators and issues in programme/project evaluations. All annual programming must identify progress against these indicators, both in EU and national programming efforts. <u>Co-operation of neighbouring municipalities</u> within BiH that have or share the same needs of citizens and challenges should be prioritized. Moreover, due to the complicated state structure, the respondents propose funds in all thematic areas to be implemented by <u>local authorities</u> and especially, in agriculture and rural development to make for most effective use of funds for citizens[21].

A strong <u>child-rights perspective</u> should be included across all the thematic windows, particularly under the sub-theme fundamental rights of thematic Window 1 (Rule of Law, Fundamental Rights and Democracy) and sub-themes "Economic and social development", "Focus on education, social inclusion and employment policies" of thematic Window 4 (Competitiveness and inclusive growth)[22].

A '<u>mapping of needs</u>' should be introduced in the cross-cutting themes. This will require Beneficiary countries to have a clear mapping and gap analysis of the needs (infrastructure, human capital, individual) at national, regional, local levels following the example of the requirements of the EU Cohesion policy, thereby further aligning accession countries with EU rules and procedures.[23] Moreover, thematic Window 4 should explicitly include the modernisation of <u>social protection systems</u>. This should be accompanied by a strong focus on deinstitutionalisation. Promoting the transition from institutions to family- and community-based services is crucial both for the well-being of children and for the long-term benefits to society. Moreover, addressing the needs of children in

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[16] See ADRF contribution for details.

[17] Agenda 2030 includes references for persons with disabilities under themes such as education, employment, reducing inequalities, inclusive cities, disaggregation of data by disability. References to vulnerable: "People who are vulnerable must be empowered. Those whose needs are reflected in the Agenda include all children, youth, persons with disabilities (of whom more than 80 per cent live in poverty)" (paragraph 23), This paragraph is particularly strong because it calls for the empowerment of 'vulnerable' people and places persons with disabilities at the center of poverty eradication throughout the entire Agenda.

[18] See GDAC contribution for details.

[19] See Save the Children contribution for details.

[20] See United Women in BiH and Helsinki Parliament f Citizens of Banja Luka contribution for details.

[21] See CGS Livno contribution for details.

[22] See Hope and Homes for Children contribution for details.

[23] Ibid.

institutional care supports the implementation of the Sustainable Development Goals.[24] Some measures are detrimental to the transformation of the system and should therefore explicitly be excluded from the programming framework[25].

Kosovo

In Kosovo, respondents put forward the same call for gender mainstreaming[26], with focus on its effects on fostering quality employment and access to the labour market. Moreover, importance is attached to tackling issues related to transitional justice, documentation, religious extremism and protection of victim's rights (including war-time and sexual and gender-based violence (SGBV)) [27]. Here, the need to support expansion of psycho-social and legal services and support to victims as an increasingly growing part of the population, documentation of transitional justice an addressing the phenomenon of religious extremism through developing rehabilitation and reintegration programs for detained population, build management and professional staff capacities in challenging aspects of human rights as well as preventing such phenomenon by combating institutional and social stigma in cooperation with community, education sector, media and public. Finally, expansion of themes under Window 3 (Green Agenda and Sustainable Connectivity) is requested to include social enterprises, circular economy promotion and endangered species conservation[28]. Other proposed thematic topics that should be included are: culture with particular focus on connection between youth from different ethnic backgrounds through culture and travelling, media (education of young journalists about free and critical reporting), human rights (education of citizens about human rights standards and protection), regional cooperation (bringing together youth and dealing with the past); and strengthening of capacities of new CSOs[29].

Montenegro

Similarly, to other countries, gender and gender mainstreaming[30] is one of the themes to be prioritized in terms of a specific percentage of funding and gender mainstreaming projects, similar as for environmental projects. Improving framework for development and provision of social and health services[31] is suggested as a further priority area. IPA III should allocate funds for combating of stigma and discrimination, violence, restrictive laws and policies, criminalizing certain behaviors and practices that affect key vulnerable groups and ensuring their equal access to social and health services. Furthermore, financial support to civil society for establishing quality of work standards and licensing of existing social services is needed in line with *A voluntary European quality framework for social services*[32]. Moreover, the focus in IPA III should be in ensuring quality policy framework implementation and creating greater level of accountability and transparency in work of public institutions in charge of contracting social service providers[33]. Respondents further recommended strengthening priorities within Window 3 (Green agenda and sustainable connectivity) by pointing to several issues that require more attention: improvement of air quality; support to alternative means

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[24] Ibid.

[25] These unwelcomed measures include: investments in institutions, regardless of the size, which perpetrate institutional treatment. This may include investments for the refurbishing, building, renovating, extending of institutions or improving energy efficiency of the care settings, etc.; housing built in segregation/isolation from the community (for example, on the outskirts of towns or in sparsely populated areas); investing in mainstream services which are not accessible (such as building schools not accessible to children with disabilities); congregated social housing (aimed at, for example, only people with disabilities, refugees etc.); training and capacity building of staff working in institutions without a plan for transition from institutional to family-based and community-based services (Hope and Homes for Children).

[26] See KWN contribution for details.

[27] See KRCT and KWN contributions for details.

[28] See Let's do it Peja contribution for details.

[29] See Center for Minority Communities contribution for details.

[30] See Women's' Rights Centre contribution for details.

[31] See CAZAS contribution for details.

[32] A voluntary European quality framework for social services (The Social Protection Committee), available at: https://bit.ly/2wYGA98

[33] See NGO "Preporod" contribution for details.

of transport (e.g. bicycles); and further investment in clean energy[34]; role of spatial planning and housing in the Green Agenda and sustainable connectivity thematic priority[35]. Finally, the right to housing was mentioned as one of the burning issues, especially for economically disadvantage groups, youth and young couples and single parents.

North Macedonia

In the area of rule of law and fundamental rights, respondents requested to have anti-discrimination[36] separated as a thematic priority and recognize specific marginalized communities such as people with disabilities, LGBTIs, Roma, women with IPA III. Also, under this priority there is particular concern that improving migration management, including border management as an approach towards migration is contributing towards violation of fundamental rights, not its advancement. Gender equality and gender mainstreaming[37] was also a topic raised, but in terms of thematic areas that organizations should promote and the need to have financial allocations similar to horizontal issues such as climate change. Thus, it is recommended to replicate the budgetary model for mainstreaming climate change action to mainstreaming gender as a horizontal objective. Additionally, introducing gender equality as a specific objective next to strengthening the respect for human and fundamental rights, rule of law, etc. are needed.[38]

Building professional public administration[39] though capacity development of public officials need support in terms of development and delivering training program for public officials. Cooperation between CSOs, who have expertise and knowledge in public administration and public institutions should be further supported and developed, especially service provision to the ministries and public agencies in conducting due diligence and functional analysis, development of internal acts for systematization of job positions in the public institutions as well as support in preparation of expert and legal opinions and analysis. Further priority to local and regional development[40] is needed in terms of further support to development of local and rural communities and the overall context of support to local democracy, decentralization and development of civil society at the local level.

Window 4 (Competitiveness and inclusive growth) should be complemented with thematic aspect of working conditions, safety and health at work[41]. In line with the EU Youth Strategy 2019-2027, it is important to provide opportunity and support to youth[42] to engage, connect and be empowered; including as a cross-cutting theme and support encouraging youth participation in democratic decision-making processes, volunteering, supporting youth employment through effective labour market policies, etc. Fighting disinformation and media support[43] is suggested as a priority for both North Macedonia and the region. To counteract the tendencies, IPA III should support actions such as: fighting online disinformation and fake news; actions for increasing confidence in the digital service market; media literacy; introduction of legislation that contributes to freedom of expression' pluralism and diversity of the media; media as a platform for democratic discourse; building professional capacities and support institutions that promote freedom of expression, etc.. Finally, the importance of health[44] as an issue addressed within Window 4 (Competitiveness and Inclusive Growth) needs to

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[34] See NGO "Uzor" contribution for details.
[35] See ADP - Zid contribution for details.
[36] See Coalition Margini contribution for details.
[37] See Reactor contribution for details.
[38] Similar conclusions and recommendations are offered in the EIGE report on mainstreaming gender in the EU budget and the Multiannual Financial Framework. Available at: https://eige.europa.eu/publications/gender-budgeting-mainstreaming-gender-eu-budget-and-macroeconomic-policy-framework
[39] See Association of Public Administration contribution for details.
[40] See Rural Coalition contribution for details.
[41] See Macedonian Occupational Safety and Health Association (MOSHA) contribution for details.
[42] See Foundation Open Society- Macedonia contribution for details.
[43] Ibid.
[44] Ibid.

be raised in importance to the level of strategic objective. Actions that could potentially be part of the programming include: available resources for progressive and non-discriminatory enforcement of health rights; support health policy reforms and participation of affected communities in decision-making processes.

Serbia

Respondents made suggestion both in relation to existing thematic priorities (Windows) and suggestions how to improve existing structure through inclusion of priority areas and important elements not included in the current IPA III proposal. Under Window 1 (Rule of Law, Fundamental Rights and Democracy), thematic priority "Migration and border management", respondents suggest inclusion of projects tackling the issue of brain drain and youth emigration[45] as well as support project raising awareness among people belonging to vulnerable groups in context of mixed migration flows on their status, legal rights and obligations. Under Window 2 (Good Governance, Acquis Alignment, Strategic Communication and Good Neighborly Relations), thematic priority Compliance and alignment with the acquis and Union's values, rules, standards and practices[46] should be transformed into cross-cutting theme because of its effect on actions under all five Windows.

Additionally, respondents suggested following priorities to be taken under consideration: participation of CSOs and citizens in decision-making and policy-development process and people to people contacts that would allow projects enhancing mobility, exchange of practice among peers and colleagues in different branches (youth, civil servants, civil society, agricultural producers, private sector, artists etc.). Under Window 3 (Green Agenda and sustainable connectivity), some of the respondents from environmental sector stated that due to lack of information on the Green Agenda that is under preparation[47], and in which the EC will define environmental and climate change priorities for the Western Balkans, they are unable to provide clear position on presented thematic priorities for environmental protection, but the percentage of budget (30%) proposed for Window 3 has been found to be very encouraging. Improvement of the air quality monitoring system; energy efficiency in residential sector; introducing the just energy transition platform of coal-reliant communities etc. are further themes to be included. Under Window 4 (Competitiveness and inclusive growth) respondents suggested that education and employment[48] are introduced as a joint policy area, including: support to implementation of career guidance policies in practice; improving the practices for traineeships; active labour market measures for youth; entrepreneurial learning and enabling environment for youth entrepreneurship; diversified employability and employment projects; support for hard to employ categories (via VET); addressing the issue of legal invisibility of marginalized groups, with an aim to enable access to basic social and health care.

Respondents put forward a number of thematic priorities that are not included in the current IPA III structure, such as community engagement activities[49], which should be encouraged due to its cost-effectiveness nature such as prevention of tensions toward refugees and Corona virus situation; media freedom and freedom of information[50]; youth[51] as a cross cutting theme to enable youth to actively participate in activities in all thematic priorities; culture and arts including tailor-made approach for both more and less capacitated entities and by prioritizing inter-sectorial projects related to social justice and global issues (socially engaged art tackling current issues such as migration, fight poverty, energy, and other), encourage projects that represent partnership with education sector, public-

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[45] See IDC contribution for details.
[46] See BOS contribution for details.
[47] See Young researchers of Serbia contribution for details.
[48] See IDC and BOS contribution for details.
[49] See Oxfam contribution for details.
[50] See NUNS contribution for details.
[51] See IDC contribution for details.

private partnerships, etc.[52]; right to housing[53] to support finding of systematic solutions and support service provision in this area; and social economy[54] comprised of measures to support social businesses and networks and umbrella organizations active in the sector.

Turkey

Respondents raised three main thematic issues: child-rights perspective[55] needs to be considered as a cross-cutting issues under all thematic Windows, including issues such as child rights of seasonal agricultural workers, refugees and Roma population with continued support to basic needs but also provision of psycho-social support and make sure that the funds are primarily used by the target group themselves. In the thematic area of child rights, tailor-made programme monitoring and developing/adapting indicators are required. Moreover, in order to better analyse the impact of the existing programmes, child-specific methodologies are needed[56]. Youth[57] theme needs to be expanded beyond education, employment and social rights and address also promotion of political and social participation of the young people. IPA III could complement other EU funding to youth with covering their activities for monitoring, mapping of the state of youth or advocacy for youth rights. More specific emphasis should be given to enabling environment for youth and a more strategic intervention logic should be developed within the scope of future financial framework. Youth should be considered a separate topic under human rights and civil society support programmes together with a more structured approach[58]. Mainstreaming rights-based approach as a cross-cutting issues[59] is one of the common needs of CSOs implementing EU-funded sub-granting activities. A certain incentive can be given to cross-cutting issues such as gender-equality, child participation, environmental rights, disabled rights, to be taken as priority by CSOs in developing their project proposals. Mainstreaming rights-based approach should be considered under each civil society support programming framework.

3.2. PREPARATION OF STRATEGIC RESPONSE

Respondents consider the value of civil society involvement crucial and important for **all phases**, including in further IPA III Regulation and framework design and IPA III programming, implementation, monitoring and evaluation. Based on lessons-learned from participation to IPA I and IPA II implementation as well as best practices from EU Cohesion and other Funds, a set of concrete recommendation is put forward. These include: the need for **meaningful inclusion of civil society** and other stakeholders in all steps of the IPA III process, **clear structures** and **process** for their involvement and **feedback loops** to ensure suggestions are taken on board in the preparation and implementation of future IPA III funds. Moreover, there is the expectation that **funding support to civil society is not part of Strategic response process**, which is understood as a mechanism whereby IPA modalities are negotiated and defined between the EC and Beneficiary country, or when it pertains to civil society involvement, it is at least separated from government involvement and driven by civil society and its needs.

Early and meaningful involvement of civil society in planning and monitoring

Any Strategic response by IPA III Beneficiary should be clearly rooted in a thorough situational analysis, needs assessment on the ground and linked to the existing legal and policy frameworks and strategic documents and action plans. Moreover, in contexts where policy and strategic frameworks are either non-existent or are not backed up by clear action plans and budgets, a *meaningful* and *early*

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[52] See CZKD contribution for details.
[53] See ADRA contribution for details.
[54] See KoRSE contribution for details.
[55] See Humanist Bureau contribution for details.
[56] See International Children's Center contribution for details.
[57] See Go-For Youth Organisations Forum contribution for details.
[58] See Go-For Youth Organisations Forum contribution for details.
[59] See the Turkey consultation report for details.

involvement of civil society through *clear structure* of involvement is needed. There needs to be dedicate *sufficient time* between the different stages of the programming process, in order to enable representatives of CSO's to adequately respond. It is essential to foresee *functioning feedback mechanisms* between various actors (Beneficiary states, EUD, etc.) and civil society, to make sure CSOs are *informed of the outcome* of their involvement and potential next steps.

The IPA III Regulation proposal refers to the role of CSOs. However, it does not yet define participation opportunities. For example, in the past, the Regulation defined the establishment of Monitoring Committees where civil society would have a role as an impartial stakeholder. Also, the reference to the Partnership Principle as in the Cohesion policy is missing in the current proposal. The Regulation must include stronger provisions for the involvement of civil society and other non-state actors (NSA) in the decision-making processes. Respondents propose that this be done by *introducing a separate article on public participation where the Partnership Principle would be elaborated in the context of IPA.* Furthermore, the programming of IPA instrument should be conductedwith an open and meaningful involvement of civil society. Such engagement should be ensured in (i) determining the concrete priorities and objectives that the EU will establish for cooperation with IPABeneficiary, including setting indicators for evaluating progress and success; (ii) monitoring progress to attainment of targets (via indicators); and (iii) preparing Strategic response by the Beneficiary. The above provisions should be elaborated under the article on public participation to be introduced.

European Code of Conduct on partnership[60] can offer a guide in how to improve the involvement of CSOs in IPA III management. Originally developed for the Structural and Investment Funds, civil society would like to see the Code of Conduct extended to the IPA III, in order to better include bodies representing civil society in *monitoring the quality and transparency of decision-making*. Under IPA II, CSOs have been invited to participate in Monitoring Committees, but this is a body pertaining only to implementation of the Regulation. Moreover, respondents pointed that selection processes for representatives of CSOs to such bodies in the past have not always been logical or transparent.

In addition, organizations working on environment and energy-related issues would like to see strong *ex-ante conditionality* on IPA funding in the environment and energy-related sector.

Keep programming of civil society support (future Civil Society Facility) separate
The principle of the Strategic response should not concern IPA III support to civil society, especially for civil society development (under current CSF). While the Strategic response approach can be applied to civil society, it should not be driven by public institutions, but civil society itself. Moreover, it should be prepared and based on the needs of the civil society corresponding to findings from monitoring of civil society environment under the EU Civil Society Guidelines and other relevant monitoring reports.

Albania
Similarly, as in the regional proposals, respondents in Albania consider <u>early</u>, <u>timely</u>, <u>continues</u> and <u>structured</u> involvement of civil society in the preparation and monitoring of the Strategic response crucial for successful management and use of IPA III support. <u>Clarity of the process</u>, <u>decisions made</u> and <u>feedback</u> is identified as crucial to quality preparation of Strategic response.

Bosnia and Herzegovina
From the perspective of CSOs, civil society has crucial role in providing appropriate feedback to IPA structures. Collection of feedback should be organised at regional and sectoral levels, since it requires significant amount of time, mobilization and capacities on the part of organisations. One of concerns

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[60] https://ec.europa.eu/regional_policy/en/policy/what/glossary/e/european-code-of-conduct

is lack of information about priorities, while additionally, there is a need for clear reporting on results of activities both by government and EU institutions.

In order to achieve policy coherence and ensure efficient and result-orientated investments, Strategic response should make a link to the sectoral context, but more importantly develop a link to strategic policy frameworks. This would align Beneficiary countries with the "enabling conditions" of Cohesion Policy' in the 2021-2027 period, formerly known as *ex-ante conditionalities* in the 2014-2020 period.[61]

Kosovo

Strategic response is considered a great tool to reflect local ownership of EU reforms, including by ensuring an adequate understanding and response from the side of Beneficiary towards opportunities provided by IPA III. Yet, the previous experience has demonstrated that EU funds (including IPA I and IPA II) have been considered by the Western Balkans governments as technical, thus a monopoly of very specific and closed circles of decision-makers dealing with European integration process. As such, the opportunity of these funds has not been maximized. To change this trend, and also to reflect the growing competence of civil society after two cycles of IPA funds throughout the region, EU should condition the governments of IPA Beneficiaries to consult external stakeholders (in particular civil society, but not only) when preparing the Strategic response. Civil society can contribute to both parts of the Strategic response, but there is particular potential to contribute to the Part 2, specifically to the sections "Key thematic priorities" and "List of actions proposed (including draft Action Documents)".[62]

Montenegro

Respondents consider that IPA III design and programming can make use of existing regional stakeholders and initiatives such as Regional Cooperation Council (RCC), Western Balkan Fund (WBF), Regional Youth Cooperation Office (RYCO) and the organizers of the Berlin Process - Bulgaria and Macedonia in conducting further consultations.

North Macedonia

Respondents recommended organization of national consultations for a national Strategic response for IPA III from civil society (i.e. Civil society' paper). The process should be initiated and run by civil society, with the Secretariat for European Affairs (SEA) and EUD as observers. The process should engage variety of NSA, including non-governmental organizations (NGOs), foundations, grass-root movements, academia and other relevant stakeholders. The Strategic response paper prepared by civil society, should serve as an advocacy tool, taken into serious consideration by the public authorities when preparing its official position.

Serbia

Respondents consider involvement of civil society is essential both for designing IPA III overall and to be involved in designing each Strategic response. CSOs should be involved in all steps of the Strategic response preparation, including to properly define the contextual framework (Step 1). Involvement of civil society can be organized in a sectorial way, i.e. by involving existing, functional networks of CSOs that facilitate the process of getting inputs from CSOs. An example from Serbia - the SEKO mechanism - could be used as a framework for cooperation. Establishing mechanisms such SEKO would bring great benefits to the planning process at the regional level.

Respondents also noted the importance of access to information to the effectiveness of the IPA funds implementation. External evaluation/ monitoring of programme should be included in the budget

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[61] See Hope and Homes for Children contribution for details.
[62] See KCSF contribution for details.

from the beginning of the implementation, with clear measure of actions for any correction/adaptation/improvement based on context changes and accountability information.

Turkey

In times of shrinking democratic space, including for HB-based organizations, the role of CSOs should be improved through <u>increasing the amount of support allocated to civil society; i.e. core funding prioritization</u> to allow for their <u>survival,</u> rather than only focusing on impact due to current circumstances in which they work[63]. Moreover, developing <u>"urgent action funds"</u> might be taken into consideration to enable CSOs promptly respond to rights violations. Experience-sharing among IPA Beneficiaries and EU countries could be organized, where similar political contexts are seen in different countries and sharing experiences could increase solidarity among CSOs. There is a need to continue <u>sub-granting activities</u> by CSOs who are implementing such activities currently in order to consolidate the objectives achieved. Based on their particular need and by looking into the findings of monitoring activities, supporting of similar follow-up activities should be emphasized during the preparation of Strategic response.

3.3. SUPPORT TO CIVIL SOCIETY

While continuing to support civil society activities through **a separate facility** – such as the current Civil Society Facility - respondents also propose funding **re-allocation** from government to civil society in cases of democratic backsliding and shrinking civic space. Similarly, **centralized management** of such support through Commission services should be continued. Civil society involvement and support should be **mainstreamed** in all Strategic responses and consequent projects funded by IPA III. Further **adjustments in funding modalities** are needed in order to respond to civil society capacities, especially those working with **service-provision**, while for **gender and women organizations** a separate allocation should be earmarked.

In country specific contributions, respondents stress the importance of continued support to **local, grass-root** and **rural civil society**, for which both **institutional grants** and **simplified financial** and **administrative modalities** are essential to access EU funding. Since the current IPA III proposal envisages access to IPA III funds on competitive basis, respondents stress that civil society support should **not be conditioned on Beneficiary country performance**. Moreover, the **use of data gathered by CSOs** through EU-funded projects, especially for maturity assessment of Strategic response could be beneficial. Finally, **improvement of indicators in EU Civil Society Guidelines** to which the civil society support under IPA III should be linked is needed for an effective monitoring and capacity building of CSOs.

Continuing support for civil society and diverting funds in cases of backsliding in enabling environment
In order to fulfill its role, contribute towards improved government accountability, and sustainability of democratic reforms, civil society expects continuous and effective support from the EU. There is ongoing trend in most of the Beneficiary countries of closing space for democracy and shrinking space for CSOs, which the IPA III should be equipped to adequately respond to, if such trend continues, or increases. IPA III should provide <u>clear basis</u> for investing in defending civic space and responses to its immediate threats, including investment in civic education, improved enabling environment, civil society infrastructure and joint civil society action.

In cases when government would lack performance and which would be linked among others to shrinking civic space, IPA III funds could be <u>re-allocated</u> as civil society support aimed at fighting democratic backsliding. While doing this, the EU can send a political message for unacceptable

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[63] Depending on the sub-granting experiences of Truth, Justice and Memory Centre (Turkey), 73% of the applicant CSOs have asked for core funding support which demonstrated the need among human rights organisations.

government behavior, without penalizing the whole society. Furthermore, in a situation of increasing undemocratic and illiberal sentiments, introducing such response mechanism to support civil society resilience, might be the long-term investment the EU is looking for in safeguarding rule of law and good governance in the Enlargement countries.

Strategic Response should include minimum percentage of funding for civil society
Every project proposed by Beneficiary countries should <u>clearly define the role and involvement of civil society</u> in design and implementation phase. A minimum percentage of funding managed through CSOs should be set up in order to insure CSOs participation.

Civil society support to be managed directly
Funding for CSOs should be<u> managed directly by EU structures</u> (i.e. Commission, EUDs) and not governmental structures. Lack of trust and transparency mechanisms add to the political situation in the country and do not provide the needed guarantees in respondents' opinion.

Civil society-friendly funding modalities
In order to foster interest among, increase the number ad diversity of applications by CSOs, IPA III should ensure that appropriate funding modalities are available to civil society (e.g. grants). Those modalities need to take into account that most CSOs are project funded with tight budgets and restricted cash-flows. Thus, CSOs should be offered <u>higher co-financing rates</u> and <u>without requirement for pre-financing from CSOs</u>, even in cases of cross-border cooperation (CBC) support (as defined in this Regulation). In this respect, provision stipulated in Article 9 (3) on pre-financing requirement should not refer to CSOs.

Specific approach for service-provision CSOs
Comprehensive approach to building capacities and networking for reaching policy reform and creating enabling environment for social inclusion is of the utmost importance for civil society <u>providing social services to citizens and communities</u>. Building and additional support to social service sector should be two-fold, comprised of measures to support local service providers and umbrella organisations i.e. thematic networks and support organisations.

Direct support to CSOs social service providers should include:
- Support to CSOs social service providers capacities: capacity building, skills development, consultancy support for development and dissemination, licensing, mentoring, etc;
- Flexible grants to support CSOs to explore potentials for financial sustainability through creating economic activity in the organization, expansion and escalation, support in promotion, creating and implementing campaigns, etc.;
- Grants for equipment in terms of new services;
- Grants for implementation of various projects covering different thematic and cross-cutting issues.

Support for networks/clusters/regional and other associated initiatives through:
- Creation and implementation of various measures aimed at capacity and partnership building of CSOs social service providers;
- Grants/projects for capacity building in terms of networking in WB and in European Union;
- Strengthening the ecosystems for the development of a more inclusive societies;
- Creation and implementation of harmonized advocacy campaigns in the region;
- Working with local governments (public procurement, local support, etc.);
- Grants/projects to promote and increase visibility.

Specific allocations for gender equality interventions by women CSOs

A separate allocation amounting to 20% of the programme should be dedicated to gender equality interventions, earmarked for financing qualified, autonomous women's rights organizations, as well as organizations that are managed by women and work with women as a target group.

Albania

There should be distinguished support to local CSOs and networks with earmarked funding (similar as under Daphne programme) for qualified, autonomous women's rights organizations that have several years of experience as service providers for women and children who have suffered violence. Clear indicators in the EU CS Guidelines for an effective monitoring gender equality are needed, rather than burying it within an index, as proposed. Finally, there is a need for a more strategic approach while designing EU supports covering sub-granting activities.

All projects proposed by each Beneficiary country should clearly define the role and involvement of civil society in design and implementation phase. A minimum percentage of funding managed through CSOs should be set up in order to insure CSOs participation as a way to foster the working partnership between government and civil society in all thematic sectors. Moreover, as IPA III funding is to be accessed by Beneficiary countries on competitive basis, it is of crucial importance to preserve the level of financial support for the civil society sector, regardless to the results of this process. In fact, it is important to ensure the activity of CSOs in the sectors where government will not be successful in accessing funding because of its underperformance.

Bosnia and Herzegovina

More attention should be paid to and support should be given to the work of CSOs that will address specific topics at the local level as well as support for trade unions and the labour movement as important part of civil society and cooperation between NGOs and trade unions to work together.

There should be meaningful participation of CSO, including by setting up a consultative body/platform to share the relevant information, ideas for intervention and suggestions in order to provide material in qualitative and quantitative way. CSO's should be actively involved in the programming, implementation and evaluation. It is particularly essential to include CSOs as early as possible in the process (including problem analysis, sector assessment and coherence and synergy with other policies and strategies). CSOs have access to key data from the ground. By ensuring meaningful participation of CSOs, IPA III investments will more efficiently support the structural reforms of the Beneficiary country.

Kosovo

Respondents calls for more explicit emphasis of the role and engagement of civil society in Window 2 related to Public Administration Reform (PAR), since experience has demonstrated that PAR is successful where there is local ownership over reforms, and systematic inclusion of civil society is crucial to building and maintaining such ownership.[64] Moreover, emphasis on consultations with women's rights organisations, local and regional authorities, recognition of their expertise and giving them timely access to relevant information to enable theyplay a meaningful role during the design, implementation and monitoring processes[65]. Due to the current weak capacities and lack of transparency in managing public funds for civil society, government institutions should not be given the possibility to manage EU funds for civil society. It is suggested that EU institutions can exert pressure on Government in Kosovo and in the region to improve management of public funds for civil society and encourages he EC to keep the civil society portfolio outside of standard consultation

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[64] See KCSF contribution for details.
[65] See Kosovo Women's Network contribution for details.

mechanisms with Western Balkans governments [66]. Finally, IPA III should provide more <u>operational and institutional funds</u> to CSOs.[67]

Montenegro

Due to negative campaign against civil society in the country, especially human rights based and advocacy-oriented organizations, respondents suggest CSF support <u>should not be managed through public institutions.</u> This can run the risk of Government NGOs (GONGOs) and Political NGOs (PONGOs) receiving all funding as well as jeopardizing autonomy of CSOs, whose independence is crucial for the rule of law and holding government accountable.

There should be earmarked funding <u>for qualified, autonomous women's rights organizations</u> that have more than 20 years of experience as service providers for women and children who have suffered violence, similar to the Daphne programme, as a separate budget line within IPA III. This would be in line with international good practice especially in line with Istanbul Convention requirements that has a focus on specialized services provided by women groups and CSOs.

North Macedonia

Respondents call for <u>support to rural and small grassroots</u>, especially in the area of rural development. Although some of the granting schemes as well institutional support is available for smaller organizations already, it is important to continue strengthening and institutional grants for the rural organizations as a prerequisite for success in securing balanced local and regional development. IPA III proposal acknowledges the majority of recommendations from the conducted mid-term evaluation on IPA II for flexibility of financial instruments, simplifying the administrative and financial procedures and offers some measures for their implementation. However, it offers limited explanation of the way it will incorporate the recommendation for <u>simplification of the administrative and financial procedures</u>. Thus, it is recommended, to state explicitly whether the recommendations for simplifications of the administrative and the financial procedures are accepted and in what way will be incorporated through IPA III. CSOs should be <u>included in the IPA III programming and monitoring bodies/committees</u> that will follow the absorption of the IPA III funds and the proper implementation of projects by public authorities. CSOs should not be evaluated by the principle of state performance, but according to the <u>principle of participation and capacity of civil society</u>. CSOs should participate in capacity building of the state and be subject to specific allocation criteria, which do not depend on the institutional capacity of the state, but on the performance for constructive democratic processes and advocacy of constituents' demands.

Serbia

Support to civil society should not be reflected only in Window 1, since civil society can play a significant role in defining priorities, objectives and actions in <u>all 5 Windows</u>, and in implementation stage of the activities needed to address these objectives and priorities. Respondents noticed that Window 1 has many important topics including support to civil society, but has only 20% of the total <u>budget allocated</u>, which posed the question whether sufficient resources to support civil society at the regional level can be insured. Civil society should be involved in all segments of IPA III each in the area of their interest and expertise.

There has been an important decrease of civil society involvement in addressing <u>refugees' needs</u>, due to challenges in fundraising and more focus on government as a recipient of aid. It is emphasized that civil society involvement should be encouraged and supported properly in order to keep strong network and capacity within the civil society that works with refugees.

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[66] Ibid.
[67] See Let's do it Peja contribution for details.

Turkey

It is important for IPA III Regulation to have specific focus on enabling environment for civil society actors and to generate an <u>effective response to the shrinking space for CSOs</u>.

"<u>Maturity assessment</u>" should be instrumental for CSOs to analyse their capacity building needs. On the other hand, one of the crucial obstacles behind the monitoring, data gathering/fact-checking activities of CSOs is the fact that there is limited information and data publicized by the public institutions. For instance, in Turkey none of the public institutions are producing gender segregated data and public institutions rarely make the existing data open to public[68]. Despite various campaigns and lobbying activities organised by CSOs, there are minor reforms undertaken by public institutions and CSOs are not in a position to analyse the link between their actions and the overall outcome in legal base[69]. Thus, the "maturity assessment" needs to be accompanied by reforms in the national information management and data collection systems (Turkstat, judicial statistics etc).

Secondly<u>, improvement of indicators in EU Civil Society Guidelines</u>[70] <u>for an effective monitoring and capacity building of CSOs</u>, incl. their diversification. For example, while there is an apparent censorship and shrinking space in freedom of expression and media in Turkey, number of individual blogs and websites established by the independent journalists as well as number of journalists that set up his/her own business can be considered among the indicators for monitoring the effectiveness of EU funds and sub-granting activities[71]. CSOs, who have been implementing sub-granting programmes, have accumulated a remarkable know-how, developed indicators for rights-based monitoring and reached out various grassroots organisations and local CSOs to strengthen their capacities and this need to be further utilized in IPA III preparation and implementation.

<u>A more strategic approach while designing EU supports covering sub-granting activities.</u> In the new phase of IPA, sub-granting programmes could be implemented with a more strategic approach so as to strengthen CSOs organisational capacity as well as enabling certain flexibility to let them adapt the content of their projects when necessary. This can be done through making financial eligibility rules and re-allocation of funds clearer, further capacity development for implementers of sub-granting schemes, ensure the sustainability of the already allocated funds/in-kind support to grassroots and local CSOs and distinguishing support to local CSOs and networks. CSOs, who have been implementing sub-granting programmes, have accumulated know-how, developed new modalities for advocacy as well as indicators for rights-based monitoring and reached out various grassroots organisations and local CSOs to strengthen their capacities. By benefitting from this accumulated know-how, the new phase of IPA may serve for strengthening these local networks[72].

3.4. OTHER[73]

Among other issues contributed were:: the importance of **flexibility** in the approach to IPA III implementation; concerns about the **public institutions capacities** and **accountability** when managing EU funds; the need to further clarify the link between **negotiations frameworks** and IPA III; and the need for **continued involvement** and **consultations** with **local stakeholders** on final IPA III design and built on the current on-line consultation process.

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[68] See Association for Monitoring Gender Equality contribution for details.
[69] See International Children's Center contribution for details.
[70] https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/civil_society/doc_guidelines_cs_support.pdf
[71] See Journalists' Association contribution for details.
[72] See Association for Monitoring Gender Equality; Journalists' Association, The Confederation of the Disabled, International Children's Centre contribution for details.
[73] There were no specific other contributions from Montenegro.

Importance of flexibility in approach

The call for flexibility in IPA III is welcomed, especially when responding to the complex mixed migration flows in the Balkans. The inputs by relevant civil society will remain crucial in determining ways to ensure access to flexible funding. Additionally, civil society should also be consulted to ensure that the money allocated to the national authorities to respond to the needs of refugees and migrants is well targeted and that it includes sufficient protection focus.

Albania

Through IPA I and II, CSOs gathered experience that can be shared and contribute significantly in all phases of the IPA III programming and implementation. It is important this <u>consultation continues</u> in the next phases as well to demonstrate to public authorities the importance of a real and timely involvement of civil society in all stages of IPA III preparation.

Bosnia and Herzegovina

The assessment and selection of the proposed actions should not only be based on Part 2 of the Strategic response, but also on Part 1. In this way, the consistency of the action with the sector context and relevance with the Enlargement process will be ensured.[74]

Kosovo

One respondent suggested <u>complete centralization of process of managing EU funds for support to civil society</u> whereby the management would be dealt with directly by the DG.

North Macedonia

Increased <u>transparency of the government bodies</u> responsible for pre-accession process is requested in a form of introducing regular obligations to the government for communicating the information and results with the public. In addition, there is a request for the government to develop participatory mechanism that will make inclusion of civil society in programming and decision-making processes obligatory.

Serbia

Some respondents offered their capacities to mobilize CSOs engaged in their respective sectors in the process of preparing the Strategic Response. In addition, respondents noted that the planning of some priorities is related to <u>negotiation chapters</u>. Given the new methodology introduced by the EC, it is not entirely clear how IPA III will follow the negotiating frameworks of different Beneficiary countries. In some of areas (most notably migration), it is stressed that grants shouldn't be given directly to the government for strengthening civil society independence and accountability based on the current track record. <u>Accountability</u> on the efficiency should be examined carefully.

Turkey

<u>Further and more strategic support to CSOs implemented sub-granting activities</u> is needed. Thanks to the innovation of sub-granting programmes that was introduced under IPA II, almost all of CSOs who have been implementing sub-granting programmes argue that they could become <u>resource centres</u> within the scope of their particular thematic area and could be considered reference organisations in terms of data, know-how, advocacy and training methodologies. The data and know-how developed by these organisations can be used as indicators while monitoring the improvements in individual rights and conducive legal environment for CSOs.

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[74] See HHC contribution for details.

ANNEX 1: LIST OF ALL CONTRIBUTING ORGANIZATIONS AND INDIVIDUALS

No	Name of the contributor	Country	Type (Organization /Individual)	No of members
1	Gender Alliance for Development Centre (GADC)	Albania	Organization	1
2	Partners Albania/National Resource Centre for Civil Society	Albania	Organization	13
3	Albanian Disability Rights Foundation (ADRF)	Albania	Organization	1
4	Foundation United Women Banja Luka	Bosnia and Herzegovina	Organization	1
5	Centre for Civic Cooperation Livno	Bosnia and Herzegovina	Organization	1
6	Muharem Berbic Foundation	Bosnia and Herzegovina	Organization	1
7	Hope and Homes for Children BiH	Bosnia and Herzegovina	Organization	1
8	Helsinki Parliament of Banja Luka Citizens	Bosnia and Herzegovina	Organization	1
9	Association "Embrace"	Bosnia and Herzegovina	Organization	1
10	Minority Community Center	Kosovo	Organization	1
11	Kosovo Women's Network (KWN)	Kosovo	Organization	161
12	Let's Do It Peja	Kosovo	Organization	1
13	Kosova Rehabilitation Centre for Torture Victims (KRCT)	Kosovo	Organization	1
14	Kosovar Civil Sociaty Foundation (KCSF)	Kosovo	Organization	1
15	Resource Center Kosovo	Kosovo	Organization	49
16	CAZAS	Montenegro	Organization	1
17	UZOR	Montenegro	Organization	1
18	ADP-Zid	Montenegro	Organization	1
19	Preporod	Montenegro	Organization	1
20	Alexandar Brajovic	Montenegro	Individual	1
21	Women's Rights Center	Montenegro	Organization	1
22	Joint submission of several CSOs**	Montenegro	Organization	10
23	Rural Coalition	North Macedonia	Organization	40
24	Foundation Open Society-Macedonia (FOSM)	North Macedonia	Organization	1
25	Reactor – Research in Action	North Macedonia	Organization	1
26	Agriimpuls	North Macedonia	Organization	1
27	Association of Public Administration	North Macedonia	Organization	97
28	Macedonian Occupational Safety and Health Association (MOSHA)	North Macedonia	Organization	150
29	Coalition Margins (Network for protection from discrimination)	North Macedonia	Organization	5
30	Belgrade Open School (BOS)	Serbia	Organization	1

No	Name of the contributor	Country	Type (Organization /Individual)	No of members
31	Adventist development and humanitarian work (ADRA)	Serbia	Organization	1
32	Independent Journalist Association of Serbia (NUNS)	Serbia	Organization	3000
33	Initiative for Development and Cooperation (IDC)	Serbia	Organization	1
34	Young researchers of Serbia	Serbia	Organization	1
35	Coalition for Solidarity Economy Development (KORSE)	Serbia	Organization	5
36	Center for cultural decontamination (CZKD)	Serbia	Organization	1
37	Oxfam (as leader of Consortium on a project)	Serbia	Organization	1
38	Confederation of the Disabled	Turkey	Organization	812
39	Go-For	Turkey	Organization	1
40	Humanist Bureau	Turkey	Organization	1
41	Journalists Association	Turkey	Organization	1
42	Monitoring of Gender Equality	Turkey	Organization	1
43	Hafıza Merkezi	Turkey	Individual	1
44	International Children's Centre	Turkey	Organization	1
45	Third Sector Foundation of Turkey (TUSEV)	Turkey	Organization	1
46	Balkan Civil Society Development Network	Regional	Organization	13
47	Gender Budget Watchdog Network (GBWN)	Regional	Organization	88
48	CEE Bankwatch Network	Regional	Organization	16
49	Save the Children	Regional	Organization	3
50	WWF Adria	Regional	Organization	1
51	Network of Local Authorities in South-East Europe (NALAS)	Regional	Organization	20
52	IRIS Network	Regional	Organization	7
53	KWN and a group of women organizations***	Regional	Organization	164
54	Anela Kozlic	N/A	Individual	1
			TOTAL	**4689**

* The contribution consists of a report prepared based on a discussion organized by NRC Kosovo on 2 Mach, 2020.

**The joint submission includes NGO Mreza 9 members of coalition of 27 NGOs from North (Izet Huseinović), ADP – Zid administrators of Open platform (Igor Milosevic), IRIS network Montenegro - Coordination office SOS Podgorica (Martina Vucelic), OKC Herceg Novi – regional YBHWBT network members (Natasa Dendic), NGO Preporod (Jovan Bulajic), NGO Uzor. Only 9 members of NGO Mreza and OKC Herceg Novi are reported under this submission, as other organizations made additional individual submissions.

*** The contribution was submitted on behalf of 170 organizations. Six organizations (Foundation "United Women" Banja Luka, Bosnia and Herzegovina, Gender Alliance for Development Centre (GADC), Albania; Helsinki Citizens' Assembly, Banja Luka, Bosnia and Herzegovina; Kosovo Women's Network, Kosovo; Reactor - Research in Action, North Macedonia and Women's Rights Centre, Montenegro) among them also submitted similar content individual contributions and hence the number of submitted organizations is 164.

ANNEX 2: INDIVIDUAL CONTRIBUTIONS

Available in a separate document.